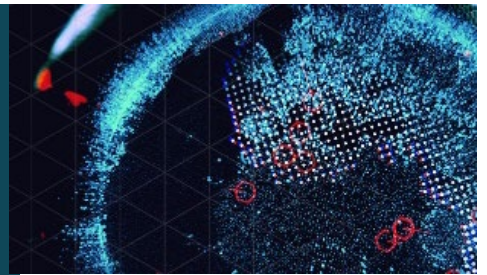


# Coronavirus/COVID-19 Checklist for U.S. Employer Considerations



March 13, 2020

Employers are facing new challenges in responding to COVID-19 and its implications for their workplaces in the United States. The checklist below will assist in thinking through the issues most likely to need attention in the immediate future. Information, agency guidance, and potential responses to COVID-19 are changing rapidly. This checklist was last updated on March 13, 2020.

## 1

### Communication and Planning

- Disseminate, as appropriate, CDC, WHO, and local health authority websites, including the below guidance from the CDC:
  - Updated information on [Coronavirus Disease 2019 \(COVID-19\)](#)
  - [Interim Guidance for Businesses and Employers: Plan and Respond to Coronavirus Disease 2019](#)
  - [Interim US Guidance for Risk Assessment and Public Health Management of Persons with Potential Coronavirus Disease 2019 \(COVID-19\) Exposures: Geographic Risk and Contacts of Laboratory-confirmed Cases](#)
  - Information regarding employee travel: [Traveler's Health](#)
- Develop a written plan of action to implement if a worker becomes sick with COVID-19 (*see below*)
- Review or adopt telework policy, and evaluate workforce to determine which jobs can be performed remotely via telework and which cannot
- Evaluate ability to provide technological support and access for significant numbers of employees performing remote work
- Review or adopt emergency preparedness policy
- Determine availability of company vacation and sick leave while employees remain out of work (quarantine or office closure); consider any needed flexibility
- Communicate with employees about safety precautions and procedures to follow in the event of various scenarios

## 2

### Workplace Safety

- Review applicable OSHA (and state OSHA) and CDC standards
  - Educate employees regarding best practices for hygiene in the workplace
  - Perform routine environmental cleaning of office
  - Take immediate steps to protect workers who are exposed to COVID-19 in the workplace (see below)
  - Actively encourage sick employees to stay home
  - Send employees with acute respiratory illness symptoms home immediately
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## 3

### Restricting Travel

- Consider cancelling or postponing company travel to [high-risk areas](#) (as determined by the CDC)
  - Ask employees to disclose any personal or business travel over the past 14 days to Level 2 or Level 3 countries, as designated by the CDC
  - Consider asking employees to limit non-essential travel to the affected regions and to provide notice of any business or personal plans to travel to affected regions
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## 4

### Response to Potential Exposure Incidents and Disclosure of Information

- Encourage employees to self-report if they have been diagnosed or exposed or have recently traveled to high-risk locations
- If employee self-reports, investigate severity of risk and who might have been exposed
- Consult guidance from state and local public health departments
- Consider asking any employees who suspect that they were exposed to COVID-19 to work from home for the COVID-19 incubation period (currently 14 days, according to the CDC)
  - If an employee has certainly been exposed to or diagnosed with COVID-19:

- Ask the affected employee to identify all individuals who have worked in close proximity with the employee during the previous 14 days
  - Ask the affected employee for permission to share the employee's name with other potentially impacted employees
  - Inform other employees of their possible exposure to COVID-19 in the workplace, but maintain confidentiality of infected or exposed individual if the individual did not provide consent to share that information
  - Avoid making any decisions based on employees' race, national origin, disability or perceive disability
  - Monitor employee conduct and enforce anti-harassment and anti-discrimination policies
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## 5

### Individual Quarantine

- If an employee is suspected or confirmed to have COVID-19, request voluntary self-quarantine or mandatory quarantine if there is evidence that the individual poses a direct threat to the health or safety of others in the workplace
  - Review federal, state and local laws concerning paid or unpaid leave, including sick leave laws
  - Consider requiring medical clearance from a doctor before employee returns to the workplace, but note that this may delay return because health care providers will be overwhelmed; consider instead requiring employees be completely symptom-free and past the incubation period before returning
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## 6

### Office Closures or Telework Arrangements

- Consider whether employees who are sent home due to an office closure will be paid or unpaid
- Follow all applicable wage and hour rules for employees who telework; be aware of differences concerning exempt and non-exempt employees with respect to time worked and furloughs
- Provide technology support for employees working from home
  - Develop guidelines for how you will respond to employee requests to work from home or stay home even absent possible exposure

- Employees in open-floor working environments may be more inclined to request work-from-home accommodations, which should be evaluated for reasonableness in light of the circumstances
- Consider telework arrangements for pregnant or immunocompromised employees
- Assess any need to cancel or postpone in-person meetings or other, larger events until further notice

If you have any questions regarding your workplace responses to COVID-19, please contact the following members of our Employment practice:

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