



Hospitality - Restarting Business Operations

COVID-19

May 2020

These safety and insurance considerations can be used as a guideline for hospitality businesses evaluating resuming their operations as stay-at-home orders are lifted.

Operational Considerations

- ☐ Follow all Federal, State and local guidelines of any stay at home orders as your primary source of instructions.
 - Open America: <https://www.whitehouse.gov/openingamerica/#criteria>
- ☐ Appoint corporate and local multidisciplinary leadership teams to oversee the entire process and make critical decisions.
- ☐ Create working committees or subcommittees to:
 - ☐ Notify utilities and pertinent government entities.
 - ☐ Ensure that all regulatory authorities, such as those dealing with environmental permitting, are notified. Establish a local pandemic response team.
 - ☐ Consult with any state or federal emergency reopening orders to determine if increased ventilation requirements will be necessary.
 - ☐ Inspect and test any idle equipment to assure it's in working order.
 - ☐ Design restart procedures, including computer systems, in accordance with manufacturer's specifications.
 - ☐ Assess raw materials and inventory on hand, restart supply chain and alert critical vendors. Inspect any remaining raw material for spoilage or shelf-life considerations.
 - ☐ Reassess and implement security needs (refer to Section 3 below).
 - ☐ Establish and spearhead communication protocols to employees, vendors and the media.
 - ☐ Create a response plan to manage employees who may become ill after returning to work.

- ☐ Debrief on lessons learned from the impacts of COVID-19 to your business, in order to update and revise your Business Continuity Program.
- ☐ Address concerns from employees who may be reluctant to return to work Provide training to employees on best practices for safe workplaces related to COVID-19.
- ☐ Protect your employees with an adequate supply of proper personal protective equipment (PPE).

Safe Practices

HOUSEKEEPING DEPARTMENT

- ☐ Consider limiting housekeeping access to guest rooms.
- ☐ Discontinue housekeeping services during time of stay to special requests.
- ☐ Provide bags for soiled linens in client rooms which can be left at door and replaced by housekeeping as requested.
- ☐ Deep clean rooms upon check-out to a standard per the CDC and association guidelines.
- ☐ Do not release rooms until 24-hours after completion of deep cleaning upon guest departure.

GUEST CHECK-IN PROCESS

- ☐ Provide or enhance digital check-ins and check-outs to eliminate/reduce human-to-human contact and passing of credit cards.
- ☐ Consider providing guests with safety supplies upon check-in: hand sanitizer; disinfectant wipes; masks; written communication re: precautions being taken by the property; suggested hygiene practices for guests; guidance based on jurisdictional requirements on social distancing and face coverings.
- ☐ Consider conducting COVID-19 symptom screening such as temperature checks upon arrival of guests.
- ☐ Consider COVID-19 symptom screening via the reservation and check-in process for symptoms and travel patterns of guests. Follow CDC guidelines and protocol.
- ☐ Determine protocol for handling confirmation of risk factors from above screenings.
- ☐ COVID-19 screening at Check in.
- ☐ Provide social distancing cues. Signage and visual cues to remind guests to maintain social-distancing protocol, e.g. floor markings at front desk.
- ☐ Publish specific sanitation standards for: guest rooms; common areas (lobby, pool areas, etc.); valet; restrooms; meeting rooms; fitness centers; office areas; back of house departments; valet, concierge, doorman, front desk, vehicles, etc.
- ☐ Ensure adequacy of hand washing facilities and signage identifying their location.

GUEST COVID-19 RESPONSE PLAN

- ☐ Establish medical treatment references for guests in event of illness.

- ☐ Include protocols for removing guest from property or isolating guests diagnosed as COVID-19 positive.
- ☐ Alter room cleaning procedures for infected guests to minimize employee contact.
- ☐ Plan for removing guest from property or isolating guest.

FACILITY CONTROLS

- ☐ Hands free hand sanitizer dispensers well distributed throughout facility.
- ☐ Perform evaluation of social distancing requirements:
 - ☐ Include general use and shared spaces.
 - ☐ Close all spaces where unable to ensure social distancing requirements.
 - ☐ Assess spa services to reduce and control transmission of the virus by using PPE; reducing range of services; work practice modifications.
 - ☐ Shuttle vehicle capacities; new occupancy limit established to maintain social distancing appropriate for vehicle size.
 - ☐ Limit number of guests in elevator to one person, or immediate family members traveling together.
 - ☐ Rearrange furniture to promote social distancing in common areas, lobbies, pool area, etc.

SANITATION PROCEDURES TO CONSIDER

- ☐ Follow the CDC guidance on proper disinfection of the workplace.
 - <https://www.epa.gov/coronavirus/guidance-cleaning-and-disinfecting-public-spaces-workplaces-businesses-schools-and-homes> (5/1/2020)
- ☐ Scheduled facility cleaning based on exposure and utilizing CDC/EPA approved COVID-19 disinfectants.
- ☐ Electrostatic sprayers to sanitize room surfaces.
- ☐ Fitness centers disinfected after each use. Require reservations and limited access to the gym. Provide bottles of disinfectants for guests.
- ☐ Provide disinfecting wipes in each guest room.
- ☐ Installation of barriers at all guest/staff related services, front desk and other points of guest interaction, e.g. store, concierge desk, snack bars or food carts, etc.
- ☐ Assess food safety practices per Federal or State reopening guidelines. See Lockton Food & Beverage reentry guides.
 - [Food and Beverage Production: Returning to Normal Business Operations](#)
 - [Fast Casual & Dining: Returning to Normal Business Operations](#)
- ☐ Review current OSHA guidance documents for your services/industry.
 - <https://www.osha.gov/pls/publications/publication.html> (5/1/2020)
- ☐ Ensure there are adequate disposable utensils, supplies in stock for guests/associates.

MINIMIZE TOUCH POINTS THROUGHOUT THE PROPERTY:

- ☐ Eliminate communal contact points, e.g. water dispensers; coffee machines; snack trays; buffet's; etc.
- ☐ Remove excess hangers, linens, decorative pillows, magazines, etc., from rooms.
- ☐ Utilize digital door key systems.
- ☐ Utilize portable card-key swiping devices at kiosks or other point of sale locations that eliminate transfer of credit card between guest and employee.
- ☐ Increased use of making charges to room vs direct payment versus charge card exchanges.

SECURITY

- ☐ Determine whether security protocols may need to be implemented where they may not have existed in the past.
- ☐ Does there need to be on-site security presence, or regular and random security patrols for the property?
- ☐ Is there an emergency action and training plan that addresses what to do in the event of a security concern?
- ☐ Are there panic buttons for front-desk personnel or for housekeeping staff to quickly notify authorities in the event of an emergency?
- ☐ Are cameras in use in common areas (i.e. front desk, multi-use rooms, parking areas), and are those either monitored in real-time or are they recorded?
- ☐ Confirm camera and monitoring systems working.

FIRE PROTECTION

- ☐ Confirm operation of smoke detectors and other fire detection hardware and resume routine system inspection, maintenance and testing procedures.
- ☐ Confirm placement and operational readiness of fire extinguishers.
- ☐ Sprinkler systems:
 - ☐ Confirm water supply integrity.
 - ☐ Inspect all valves to ensure all are open, locked and operating properly.
 - ☐ Confirm water flow and valve tamper alarms are working.
 - ☐ Inspect and test fire pump and related equipment.
 - ☐ Resume routine system inspection, maintenance and testing procedures.

Supply List

Organizations should evaluate having protective and preventive supplies available for employees and visitors. The supplies and their location may vary by situation and by operational need. These supplies may include:

- ☐ Hand sanitizer (CDC recommends $\geq 60\%$ alcohol based).
- ☐ Sanitizing wipes (CDC recommends $\geq 70\%$ alcohol based).
- ☐ Disinfectants and disposable towels for workers to clean their work surfaces and equipment (using EPA-approved disinfectants).
 - <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

LOCKTON VENDOR LIST FOR COVID-19 DISINFECTION SUPPLIES AND OR CONTRACT SERVICES

- ☐ Selecting a cleaning service: At a minimum, any selected cleaning services should be certified in compliance with the Cleaning Industry Management Standard (CIMS). CIMS-certified services offer the assurance they have management systems and operations in place to deliver consistently high-quality services. Contractors that are credentialed in decontamination may also provide more assurance they are qualified to perform the required cleaning and decontamination services.
- ☐ Vendors: A list of vendors who can be consulted to provide products and or services for COVID-19 disinfection practices/work:
 - http://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Decontamination_and_sanitation_BP.pdf
- ☐ Proper face masks. The CDC and OSHA recommend that Personal Protective Equipment (PPEs) be selected based upon the hazards of each individual workers.
- ☐ Body Temperature Devices. [See the Lockton guide on no touch thermometers.](#)
- ☐ Display posters promoting hand-washing – ask your local public health authority.

EMPLOYEES

- ☐ Prepare with Human Resources for returning employees as well as those new to the industry.
- ☐ Develop strategy to quickly and effectively on-board new employees virtually.
- ☐ Update your Hazard Communication Program to reflect new chemicals introduced into the workplace.
- ☐ Identify refresher training needs and scheduled training missed during periods of shut down or furloughs.
- ☐ Perform a documented Personal Protective Equipment (PPE) risk assessment to determine new requirements for affected positions.

- ☐ Consider symptom screening tools:
 - ☐ Health questionnaires completed daily by employees before entering premises.
 - ☐ Pre-shift temperature checks performed daily at point of entry.
 - ☐ Include protocol for employees who confirmed presence of risk factors on questionnaire, and or elevated temperature finding.
 - ☐ Mental and physical wellness (feedback or suggestion for returning to work).
- ☐ Review and update Emergency Response Plans to maintain new social distancing norms.
- ☐ For those employees that are reluctant to return to your workplace, plan what will be done to reassure them that it is safe.
- ☐ Review the Employee Assistance Program for mental health guidance and services.
- ☐ Specific guidelines may also need to be established for employees with pre-existing or high-risk medical factors. This may include, but not limited to, the continued offering of voluntary remote work options for these workers.
- ☐ See more information on remote workforce at:
 - <https://www.lockton.com/coronavirus-mental-health-and-remote-workforce>
- ☐ Business travel policies should be updated to promote and identify essential situations. Updated guidelines during business related travel should also be reviewed and modified, if needed. See the World Health Organization’s guidelines on workplace and business-related travel:
 - <https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf>

EQUIPMENT/VEHICLES

- ☐ Shuttles
 - ☐ If equipment and/or vehicles sat idle, what start up procedures, maintenance and/or inspections are needed to get this equipment ready for regular day to day operations. Do you have the staff to complete or are your vendors prepared to assist? What is the timeline to get everything operational?
 - ☐ PPE and sanitation supply available in vehicle. Training provided to employees on sanitation procedure and guest interface protocol.
- ☐ Valet service. Consider how to safely provide or discontinue.
- ☐ Pools and spas (biological or chemical hazards).
- ☐ Fitness equipment (physical hazard).
- ☐ Boilers and chillers (physical or biological hazards).
- ☐ Are state mandated inspections or registrations overdue for any company owned vehicles, trailers, etc?
- ☐ Any special equipment and/or start up requirements or protocols that need to be communicated?

- ☐ Startup operations involve many non-routines or seldom used procedures, is everyone involved in the startup familiar with the procedures and properly trained?

CLAIMS CONSIDERATIONS

- ☐ Consider challenges with returning furloughed or new employees to work.
- ☐ Review and restart random drug testing and other screening protocols.
- ☐ Review and restart fit for duty and physical capabilities testing exams.
- ☐ Restart transitional modified duty programs for employees previously off work or working.
- ☐ Modified duty due to Workers' Compensation pre-closure claims.
- ☐ Rebuild job banks.
- ☐ Reestablish wellness programs.
- ☐ Work with Workers' Compensation carriers and employment attorneys to assure statutory compliance.
- ☐ Confirm procedures in place to thoroughly investigate all reported accidents, including first aid cases and near misses.
- ☐ Coordination of continued leave for COVID-19 sick leave or Workers' Compensation with FMLA and ADA guidelines.
- ☐ Establish a plan to deal with a potential increase in claim filing due to layoffs.

COMMUNICATION

If your business was impacted by the pandemic (e.g. confirmed transmission in your facility), proactive communication will be crucial to ensure that your customers and local community know that you are “open for business.” Provide clear and concise information describing any process or procedures your company has implemented to protect your employees, customers and community moving forward. It is expected that both customers and employees returning to their “normal” activities may experience a psychological hesitation of feeling safe. Communications of the pro-active actions taken to re-open facilities and keeping individuals free from known exposures will be invaluable in successfully moving forward.

BUSINESS CONTINUITY

Once you return to your site, it is recommended that your Business Continuity Program (BCP) be reviewed and updated accordingly based on the outcomes and lessons learned through this pandemic so your organization is prepared for the future. All facets of your business should be examined (e.g. IT infrastructure, software and video conference platforms, remote working policy) and reviewed.

See Lockton's article on Business Continuity: https://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Coronavirus_Continuity_GUIDE.pdf

BUSINESS INSURANCE CONSIDERATIONS

As workers, customers and visitors re-enter facilities, sound risk management techniques should be utilized for the pro-active safety of individuals and the protection of the organization. Entities should follow proper investigation and documentation techniques, for injuries and damages which may occur. All potential losses should be reported by organizations to their applicable insurance policies in a timely manner.

More information on COVID-19 related losses can be found at:

- Lockton - Coronavirus Insurance Coverage and Claim Guidance:
 - http://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Coronavirus_Insurance_Coverage_and_Claims_Guidance.pdf
- Lockton - Property Business Interruption and Civil Authority COVID-19 Claim and Coverage Guidance:
 - <https://www.lockton.com/insights/post/will-my-property-insurance-policy-cover-coronavirus-covid-19-losses>
- Lockton – COVID-19 and Employment Practices Related Claims:
 - http://s3-us-west-2.amazonaws.com/lockton-corporate-website/Compliance-Alerts/Employment_Practices-Related_Claims.pdf
- Lockton – Managing worker’s compensation for remote workers:
 - <https://www.lockton.com/insights/post/managing-workers-compensation-exposures-from-remote-workers>