Energy: Recovery, Readiness & Reentry in a Post-COVID-19 Business Environment

This document will help organizations and their reentry task force teams identify some of the mitigation strategies needed as business operations are restarted or expanded as the stay-at-home orders are being lifted. Additional best practices may be recommended by our clients, local, state and federal regulators as conditions change and as additional information becomes available.

This document is provided to help you think through what is needed when evaluating your operating conditions during the development of your reentry plans. Each operation will need to follow any federal, state, regulatory and licensure expectations, whichever is primary in your jurisdictions.

Reentry considerations

For operations that have been closed, restarting building equipment, machinery and vehicles as well as managing the expectations of employees, customers and local regulators may be challenging. These are some considerations to discuss with your task force as you begin to build your plan.

- Appoint corporate and local multidisciplinary leadership teams/task force 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.
  - Identify responsibilities of department and site managers.

- What federal, state and local guidelines are in place for stay-at-home orders in your area?
- What resources are available to help?
  - See Whitehouse Open America link here.
- Consider a plan for staged reentry to better manage social distancing.
- Evaluate the all job tasks to evaluate OSHA hazard level for the severity of the COVID-19 virus exposure.
- Identify the roles of each department and worksite manager including shops, yards, man-camps, maintenance, construction sites, well sites, tank farms, pipelines, vehicle operations and others unique to your operations.
- 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.
- How will you communicate with employees, vendors and the media?
- How will you manage the response for employees who may become ill after returning to work?
- How will you address concerns from employees who may be reluctant to return to work?
- What training will be needed to educate employees on best practices for safe workplaces related to COVID-19.
- What protective equipment and cleaning essentials are needed for your employees.
- Debrief on lessons learned from the impacts of COVID-19 to your business in order to update and revise your Business Continuity Program.

Workplace readiness

In order to further prepare for the resumption of operations and the reentry of the workforce, the following is a brief outline of topics to consider for an organization's unique needs. These items may also be included in a reentry checklist to evaluate readiness of your systems for startup operations, including but not limited to:

- Machinery and equipment.
- Building.
- Electrical.
- Communication.
- Exterior.
- Building envelope.
- Interior.

- Security.
- Fire protection.
- Fleet/equipment operations.
- Locations under construction.
- Claims considerations.
- Operations.

The link to the workplace readiness guide from the World Health Organization is attached here.

Responsibility/committees and teams

The development of internal, company-specific guidelines in response to the pandemic should follow local, state and federal guidelines; however, it is advised that they be developed, reviewed and implemented using a team approach.

These responsibilities may include, but are not limited to, the following:

The COO/CEO

Who do you plan to include on the task force? Committees and teams should include representatives from executive leadership, operations, facilities, engineering, safety and health, human resources, and employee representatives as needed for your specific operations.

Executives are responsible for identifying the teams with responsibility for developing the return to work site plans. The return to work site task force will have responsibility to identify all the federal, state and local guidelines. For some operations, additional members of the task force may need to include union representatives and customer representatives.

Further, it is important the COO/CEO:

- Provide program direction.
- Delegate responsibilities for reviewing and understand procedures and protocols, leases and contracts, staffing and operational changes, and other potential legal exposures.
- Require regular feedback from the task force.
- Meet with Lockton's risk management team to update any needed coverage and assess new liability risks.

Operations leadership

How are you planning to stage reopening? What equipment, materials and people are necessary to begin restarting the operations? Some items to consider for this plan includes:

- Identification of the equipment, materials and people necessary to begin restarting the operations.
- Development of the phased return of employees and equipment to the workplace.
- Coordinating the implementation of the program within their facility.
- Understanding guidance from the OSHA and the CDC.
- Consulting with health and safety on local, state, and federal return to work site guidelines.
- Implementation of procedures to protect our employees, guests and visitors.

Facilities management

What criteria have you developed to plan for opening facilities and inspecting buildings and equipment?

Some items to consider for this plan includes:

- Designate specific entrances and exits.
- Minimize employee travel within buildings.
- Determine where to place hand sanitizer at doorways, both inside and outside.
- Develop an employee and guest screening questionnaire and consider the use of body temperature screening using infrared, no-touch thermometers or walk-through temperature scanners following CDC guidelines.
- Establish marks on floors to encourage social distancing where people may congregate.
- Establish cleaning crew practices.
- Assure that employee training, including on new hygiene practices, is completed.

Health and safety

The health and safety team is essential to help understand the hazards of the operations and completing the OSHA required hazard assessments. This process is essential for the development of the overall plan, including social distancing and any other protective measures that are required by state and local authorities.

Some items to consider include:

- Monitor changes in local, state and federal guidelines for responding to COVID-19.
- Monitor changes to stay-at-home orders or return to work restrictions.
- Following OSHA guidelines for workplace safety under COVID-19.
- Maintain records in accordance with our return to work site plan.
- Recommend changes to the return to work site plan and other programs as needed.
- Report on the success and improvement opportunities for the reentry plan.

Human resources

How are you going to manage returning employees to the work site? What changes if any are needed in your illness policies? How will you determine when a COVID-19 illness is considered work related or OSHA recordable? Some items to consider for this plan may include:

- Update the EAP program, providing guidance and services for employees.

- Update business travel policies to identify essential travel situations.

- Collaborate with operations to determine which employees should return first.

- Manage sick employees following existing guidelines.

- Communicate with returning employees that are reluctant to return to work when there is no evidence of imminent danger.

- Follow all OSHA, NLRA, FFCRA, FMLA, HIPPA, ACA, ADA, EEOC, and other local, state, and federal state employment-related requirements/laws/orders for personnel privacy, documentation, claim reporting, OSHA recordable/reportable cases and anti-discrimination.

Employee

Employee behavior is a critical part of reentry to the work site – what safe practices do you plan to implement to engage employees in their safety and protecting others? Do you plan to use the CDC health questionnaire for employees to complete each day? Some key considerations may include:

- Requesting employees to complete a health questionnaire if that is part of your reentry plan.

- Asking employees not to come in to work when they have a fever over 100.4°F or any signs or symptoms of illness.

- Asking employees to contact their supervisor prior to going to work if they have any signs/symptoms of illness.

- Follow handwashing, social distancing, use of facilities/meeting room and other guidance within our return to work site plan.

- Use face coverings as required by your policy and hazard assessments.

Reception

How do you plan to maintain social distancing in lobbies and reception areas when visitors arrive? Do you plan to have visitor sign in and are you planning to provide them with a copy of your plan for their safety? Do you plan to require visitors to complete the CDC health questionnaire or body temperature scans? These are some of the considerations for your plan:

- Provide instruction to visitors (e.g., vendors, clients, guests, and other non-employees).

- Have visitors complete any necessary documentation, as outlined in our internal policies and return to work site plan upon arrival.

- Notify visitors of new policies and procedures.

Communication

What is your communication strategy? Who will be responsible for the communication with employees, vendors, customers, clients, visitors and members of the general public? It is important to ensure these groups and the individuals representing them understand their role and importance of helping you execute a reopening plan in a successful manner.

Communication channels include, but are not limited to:

- Social media.
- Facility signage, posters and access.
- Employee, visitor and contractor training.
- General notifications.
- Leadership and employee dialog.
- Email.
- Employee portals.
- Text messages.
- Virtual and live events.

Phased reentry

How do you plan to return employees to the work site to restart or expand operations? Who are your most critical employees and operations needed for expanding your operations? Your plan may vary between sites based upon the type and extent of the operations.

The number of phases should may be determined by your site hazard assessment and operational needs.

General practices

With the enhanced health requirements that have been put into place to combat the spread of COVID-19, it is important to review local, state and federal requirements to ensure compliance. Each location will need to develop an operational startup checklist for each department and specific location. Examples include the following:

Entrances

Do you have control of your entrances? What are your plans for limiting access to your work site?

- Designate specific entrances and exits.
- Consider the use of the CDC self-screening questionnaire.
- Do you plan to include temperature screening?
- Strategically place hand sanitizer at doorways, both inside and outside.
- Establish routes in/out of the building to allow for social distancing.

Reception

How do you plan to register guests to maintain social distancing in the reception areas?

- Have visitors acknowledge our procedures for social distancing and hand washing.
- Use plastic or glass screen barriers.
- Use touchless registration methods.
- If necessary, provide appropriate PPE and hand sanitizer for visitors in the lobby/reception.

Visitors

How are you currently tracking visitors and controlling access? Visitors are a necessary part of our business; however, procedures should be developed to encourage the use of virtual meetings whenever possible. If an on-site meeting is essential, procedures should be developed to assure the safety of the guest(s) and employees.

Shipping and receiving

How are you currently tracking deliveries and controlling access by delivery personnel?

- Limit access by delivery personal to the receiving area only.
- Receive items on the first floor, or as close to a primary entry/floor as possible.
- Require employees handling packages and mail to wear appropriate PPE.

Common areas

Do you have a plan to maintain social distancing practices where people may congregate, including lobbies, elevators, reception, break areas and snack or coffee bars?

Restroom usage

Do you have a plan to manage social distancing in the restrooms? Consider developing a plan that includes:

- Installing signs indicating occupancy limits and to promote good hand washing techniques.
- Using paper towels or similar products to guard clean hands when opening restroom doors.
- Considering occupancy limits.

Shop, yard, dining and accommodations/personnel camps

Maintaining social distancing in work areas where employees' visitors may congregate is an important consideration to reduce the spread of COVID-19. Work plans addressing each of these potential areas are needed:

- Maintaining social distancing of 6 feet during breaks, team meetings, training meetings, accommodations in man-camps, and during mealtimes.
- Continuing to follow existing company guidelines on the use of PPE required for specific job tasks.
- Using masks when working in teams closer than 6 feet, as required by local and state requirements or outlined by our return to work site plan.

Equipment and vehicles

Develop a vehicle use policy to follow social distancing as much as possible. This may include:

- Assigning equipment and vehicles to a specific employee whenever possible.

- Cleaning touched surfaces between shifts or when employees share vehicles/equipment.

- Limiting vehicle occupancy and consider face coverings when a passenger is present.

Meeting room use

Establish practices for meeting room use that may include:

- Determining if the meeting can achieve the desires outcomes/goals using a virtual meeting — if so, the meeting should not be scheduled in-person.

- Scheduling in-person meetings to assure adequate time for cleaning between meetings.

- Assigning responsibility for cleaning prior to and after using the space.

- Establishing maximum participants for each meeting/conference room to allow adequate spacing given the size of each specific room.

Screening employees

Determine if your plans will include employee screening on a nondiscriminatory basis and how you will treat confidential medical information under ADA and HIPPA.

Consider how to staff and manage entry screening for guests and employees, which may include:

- Optional health checks each time an employee or visitor enters the property.

- Communicating clearly, in advance, with employees regarding temperature checks and related implications (e.g., being sent home).

- Appointing someone with proper training — ideally a PLHCP to administer the program.

- Maintaining social distancing, cleaning and disinfecting medical equipment, and taking other COVID-19-related precautions as outlined by the CDC, state and local authorities or our return to work site plan.

Classifying risk of worker exposure

Specific tasks/environments may increase exposure to COVID-19 based upon our work activities, proximity to others (both in and outside of the workplace), the conditions of the communities in which an employee lives, an employee's specific activities and travel outside of work, and individual health conditions — amongst many other factors.

OSHA has divided job tasks into four risk exposure levels: very high, high, medium, and lower risk, with most employees included in the lower or medium exposure risk levels. Determining which level our employees should be classified as will require completion of a hazard/risk assessment of the activities within our workplace and implementation of mitigation steps to control the identified hazards.

The evaluation checklist should include the risk rankings:

LOWER EXPOSURE RISK (CAUTION)

Jobs that do not require contact or have minimal occupational contact with the public, other coworkers and people known or suspected of being infected COVID-19.

MEDIUM EXPOSURE RISK

Jobs that require frequent and/or close contact (i.e., within 6 feet of) with people who may be infected, but who are not known or suspected, with COVID-19.

HIGH LEVELS OF RISK

Jobs that require providing first aid or emergency care to other employees may be classified as having a higher level of risk.

VERY HIGH LEVELS OF RISK

Jobs that require direct patient care or to or handling of COVID-19 pathogens that may include doctors, nurses, dentists, lab workers and morticians; all have the highest level of risk but would likely not be present in operations outside of healthcare.

Cleaning

Employee responsibilities

Employees should be responsible for routinely wiping and cleaning all frequently touched surfaces in their work area. Some of these surfaces may include:

- Keyboards/mouse.
- Telephones.
- Meeting tables/chairs.
- Doorknobs/handles.
- Copy machine controls.

Cleaning crew

Have you established the duties and described the responsibilities of a cleaning crew for your workspaces? This could be the team that cleans the space occupied by our employees but not include the common spaces that are shared with other tenants, if any.

Cleaning crew duties may include:

- Establishing frequency of cleaning depending on usage and potential exposure.
- Identifying components to clean in offices, cubicles and other workspaces that may include:
  - Keyboards/mouse.
  - Telephones.
  - Meeting tables/chairs.
  - Doorknobs/handles.
  - Common work areas.
  - Walkways, cube aisleways, etc.
  - Mailrooms/copy/fax machines.
  - Constantly touched surfaces including vending machine buttons, coffee pots, elevator buttons, door handles, door push plates, counters, break room tables and recreational equipment.
- Developing enhanced cleaning and disinfection practices after persons suspected/confirmed to have COVID-19 have been in the facility.
- Please see Lockton's dedicated document here.

Travel

Have you established criteria to determine what travel is permitted, how to recognize essential and nonessential travel, and set expectations for approvals? The following criteria and factors can be considered:

- Essential travel:
  - Includes tasks that are part of the basic job description that cannot be performed remotely.
  - Includes tasks that do not require air travel and may be performed using vehicles.
- Nonessential travel:
  - Includes travel to meetings that could be performed via telephone or video conference.
- Nonessential travel approval may require:
  - All travel by air or boat receive approval prior to committing to any off-site meetings.
  - Review of the specific travel restrictions in each state.
  - Provide employee(s) all necessary PPE for the job task to be completed and to meet all state and local requirements.

Business supply list

Have you completed an evaluation of the protective and preventive supplies needed for employees and visitors? Considerations for supplies may include:

- From whom will you source your supplies?
- How much will you need and for how long?
- What should I be responsible for providing?
- Review CDC and FDA for approved body temperature measuring tools such as forehead temperature readers or thermal imaging cameras.
- Display posters promoting handwashing, social distancing, EAP, mental health and other personal and public health topics.
- Barriers and tape for marking off areas requiring social distancing.
- Contact Lockton's Risk Control Consultant or account team for assistance.

Training

Trained and educated employees, contractors and visitors is an important step to limit the exposure and potential spread of COVID-19 virus. Assignment of responsibility for developing the plan and constantly monitoring to update the information when new training information is available.

Training topics for the prevention/reduction in the spread of COVID-19 topics may include:

- Individual responsibilities to reduce the spread of COVID-19.
- The importance of staying home and following CDC guidance if individuals are sick, except when medical care is needed.
- Employees inform supervisors if they have a sick family member at home with COVID-19.
- Hand washing practices using soap and water for at least 20 seconds.
- The use of hand sanitizers with at least 60% alcohol, if soap and water are not available.
- Guidelines for practicing social distancing by avoiding large gatherings and maintaining distance (approximately 6 feet or 2 meters) from others when possible.
- Cleaning frequently touched objects/surfaces at employees' workstations including keyboards, telephones, mouse, light switches, door handles and copy machine after use.
- When and how to use PPE: what PPE is necessary; how to properly don (put on), use, and doff (take off) PPE; how to properly dispose of or disinfect, inspect for damage, and maintain PPE; and the limitations of PPE.

Business insurance considerations

Follow your existing incident investigation and documentation techniques for injuries and damages which may occur. Report all potential losses in a timely manner.

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

- Coronavirus Insurance Coverage and Claim Guidance
- Property Business Interruption and Civil Authority COVID-19 Claim and Coverage Guidance
- Managing workers compensation for remote workers

Business continuity

How will your operations and business practices change and possibly including repurposing of some part of the operations in this rapidly changing business environment? If you do change operations or services, have you completed a risk assessment to update hazards and control systems? Have you notified your Lockton Account Executive about the change in business operations or requested assistance from Lockton Risk Control Consulting?

We are available to help you in this process. Have you determined what you need to maintain critical operations (e.g., identify alternative suppliers, prioritize existing customers or temporarily suspend some operations as needed)? This may include:

- Contacting your Lockton Account Executive or your Risk Control Consultant for assistance or questions.
- Identifying alternate supply chains or distribution pathways for critical goods and services.
- Review the business continuity program (BCP) and update the program based on the outcomes and lessons learned through this pandemic.
- See Lockton's article on Business Continuity.