Developing Guidelines for Returning to Work

Business Roundtable appreciates the work of federal, state and local officials to develop plans for the lifting of restrictions on activity when it can be done safely. As state and local governments move to lift restrictions, it will be necessary to put in place other measures to keep Americans safe, including measures to protect worker and customer safety.

Business Roundtable has called for detailed guidelines from the Centers for Disease Control (CDC) on the measures employers could take to keep workers and customers safe. Business Roundtable also supports efforts by states to coordinate their guidelines, including through regional groups.

Consistent guidelines on workplace and public safety will ensure a common understanding of the measures being taken across the country and build confidence among workers and consumers that they can safely return to work and public activity. Consistent guidelines will also provide clarity to employers that operate across multiple states, preventing inefficiencies that would result from diverse and potentially conflicting rules.

In Exhibit 1, we have outlined categories that should be covered by public and worker safety guidelines as economic activity gradually resumes in phases as described by the White House Guidelines for Opening Up America Again. Key categories include:

- *Movement and activity (workplace activity, gathering size, physical distancing, movement, and commerce).* Restrictions on movement and activity form the basis of many shelter-at-home orders and public health guidelines today. As reopening begins, key considerations include work arrangements and space configuration, appropriate occupation density, introduction of safeguards in high-traffic areas, distancing measures and gathering sizes in different workspaces and environments.

- *Public and workplace safety and trust (protective equipment, hygiene and cleaning, vulnerable populations).* As community-based restrictions are gradually lifted, states and communities should have in place plans for other kinds of protections that can keep Americans safe including, among other things, the broader use of face coverings and other protective measures, cleaning procedures, virus monitoring, and robust plans for contact tracing. Additionally, investment and policy changes to increase the availability of critical resources will continue to be needed. Key considerations include clarifying the types of equipment required in different contexts to support hygienic practices, defining expectations for the type and frequency of cleaning and sanitizing, and considering vulnerable/at-risk populations and their caregivers. Where there are shortages of particular supplies, policymakers should delineate appropriate alternatives.

- *Monitoring (screening, testing, tracing and tracking, communication).* As limitations on movement and activity are lifted, consistent and uniform CDC guidelines are needed regarding which parts of the population should receive diagnostic or serological testing, and continued, robust investment will be needed to rapidly scale up testing capacity. Employers would also benefit from guidance on screening for employees before entering the workplace through, for example, at-home temperature checks or questionnaires. Further, guidance is necessary to determine appropriate techniques and technologies for tracing and tracking as well as communicating results of those efforts, while taking privacy into consideration. Finally, monitoring will be critical to helping communities

identify any potential resurgence of the virus and to acting quickly to reimpose community-based restrictions where necessary.

Exhibit 2 provides a template with some specific suggestions on public and worker safety guidelines in four separate environments: office; retail; manufacturing; and construction. The guidelines are designed to be detailed but not overly prescriptive. As policymakers and employers learn more about the science and the effectiveness of particular approaches, guidelines should be modified accordingly.

Exhibit 3 lists some additional questions for consideration as policymakers create and implement guidelines. Business Roundtable welcomes the opportunity to work with public health officials and other experts in the coming weeks to help answer these questions and develop more detailed recommendations.

Finally, Business Roundtable would like to highlight two important considerations:

Policymakers should establish a reasonable timeline and allow flexibility for essential businesses to implement new guidelines. This would avoid disruption to ongoing operations and ensure all Americans have access to essential services, products, and supply chains through the duration of the public health crisis and each phase of the recovery. In the event of supply shortages, compliance deadlines or approaches should be adjusted to reflect what is feasible for businesses to comply while performing essential functions. In some cases, policymakers may need to prioritize access to PPE and other equipment for essential services before other non-essential businesses receive supplies.

In addition, other enablers will impact the ability of people to return to work, such as safe schools, childcare services, public transportation and comprehensive healthcare services. Policymakers should put these issues at the forefront of planning efforts.

- *Schools and summer activities for children*. Reopening schools and permitting summer activities for children is essential to minimizing the disruption to education and enabling employees to return to work. Policymakers should ensure appropriate measures can be taken to safely re-open these activities without jeopardizing the welfare of children, educators and staff. Communities should invest in resources, such as expanded cleaning supplies or distance learning technology, which will enable these activities to safely continue.

- *Childcare services*. Similar to schools, re-opening of childcare facilities will enable employees to return to work with confidence. This should be done once deemed safe to do so, under the guidance of public health experts. Childcare facilities will need to adjust operations to ensure they are following proper guidelines, such as increased cleaning standards and reduced capacity.

- *Public transportation*. Public transportation is an essential enabler for the return of many individuals to their workplaces. As businesses open, communities will need to adopt measures to adhere to social distancing guidance and protect users from potential exposure, such as limiting ridership, operating with adjusted schedules, more frequent deep cleaning, and/or requiring face coverings.

- *Comprehensive healthcare capacity.* Another crucial element of community recovery is the resumption of comprehensive, non-COVID-19 healthcare services. For much of the country, non-COVID-19 healthcare services other than urgent care have ceased, preventing individuals from accessing necessary care and threatening the viability of healthcare providers who have lost substantial amounts of revenue. As communities prepare to lift restrictions, they should prioritize resumption of comprehensive health services and ensure sufficient supplies, resources and capacity to treat all non-elective patients and respond to a future resurgence of the virus without resorting to crisis standards of care.

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Exhibit 1: Example measures to ensure public health and safety

Categories of guidelines, to be adapted and implemented by state and local officials and tailored by environment (e.g., office, retail)

	CATEGORY	MEASURES
Movement and Activity	Workplace activity	• Precautions placed on the on-site operations of individuals and business (including access)
	Gathering size	• Precautions on gathering of individuals (e.g., meeting size, event size)
	Physical distancing	• Precautions on physical proximity to other individuals (including occupancy)
	Movement and commerce	• Precautions on the movement of people
Public and Workplace Safety and Trust	Protective equipment	• Use of protective gear (e.g., face coverings) outside of the home / at workplaces
	Hygiene and cleaning	• Actions taken to disinfect public and private areas, maintain personal hygiene
	Special measures for vulnerable populations*	• Adjusted precautions to ensure people most at risk are protected (e.g., special hours at stores)
Monitoring	Screening and testing	• Use of health screening (e.g., temperature checks, questionnaires) to manage workplace entry, and protocols for when and how to use diagnostic and serological testing
	Tracing and tracking	• Guidelines for contact tracing in the event of a positive case and symptom monitoring
	Communication	• Protocols for collecting, reporting, and sharing information regarding COVID-19 response

* See Exhibit 3B for a clarifying question regarding the definition of vulnerable populations.

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Exhibit 2A: Guidelines to be tailored by environment | Example: Office

		Phase One*	Phase Two	Phase Three
Movement and Activity	Workplace activity	**Limit in-person work and minimize employee contact where possible, e.g.,** • Gradual/phased return to in-person work; continue to encourage telework and remote meetings to reduce density in the office • Adjusted workplace hours and shifts (if working in-person, leverage A/B teams or staggered arrival/departure) to minimize contact across employees and reduce congestion at entry points; close contacts of infected individuals should telework until safe • Limit visitors and service providers on site; shipping and deliveries completed in designated areas		**All work and activities allowed, e.g.,** • Normal hours and work shifts • Only symptomatic individuals and members of vulnerable populations continue to telework
	Gathering size	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**No constraints on gathering size**
	Physical distancing	**Ensure >6 ft between individuals where possible unless this creates a safety hazard, e.g.,** • Close employee common spaces where employees are likely to congregate (e.g., break rooms, eating areas) unless physical distancing can be assured; remove chairs and/or use distance markers to assure spacing (e.g., workstations, conference rooms) • Workers assigned designated work areas (e.g., floor, building); improve ventilation for enclosed spaces where possible		**Targeted distancing measures, e.g.,** • Employees encouraged to limit time in common spaces • Members of vulnerable populations should limit physical contact
	Movement and commerce	**Limited travel, e.g.,** • Gradual increase in business travel focused on necessary business activities and with safety precautions	**Continued gradual travel increases with safety precautions, e.g.,** • Restrictions on travel to/from higher risk areas	
Public and Workplace Safety and Trust	Protective equipment	**Precautionary measures, e.g.,** • Face coverings required for all employees unless workplace configuration and/or seating can assure proper physical distancing; gloves highly recommended for employees in frequent contact with others, or who work with food, re-filling office supplies, etc. • Physical partitions for workers in high traffic areas or those who cannot be spaced out		**Proactive precautionary measures, e.g.,** • Face coverings recommended for all employees, especially members of vulnerable populations • Physical partitions for workers in high traffic areas
	Hygiene and cleaning	**Cleaning and hygiene standards, e.g.,** • Disinfecting of contacted surfaces daily and deep cleaning of exposed areas in event of a positive case • Frequent disinfecting of heavy transit areas and high-touch surfaces (e.g., doorknobs, elevator buttons, vending machine, bathrooms) • Shared spaces (e.g., conference rooms) cleaned between use and supplied with cleaning products (e.g., sanitizer, disinfecting wipes)		
	Special measures for vulnerable population	**Protection for members of vulnerable populations, e.g.,** • Consider accommodations for vulnerable populations, or those interacting with them, to have designated separate workspaces, adjusted hours and provision of additional protective equipment • Pursuant to ADA / any state disability laws, work with vulnerable population employees to see if they need any adjustments to their job (e.g., shift to positions with lower contact with other individuals)		
Monitoring	Screening and testing	**Continuous health screening to enter workplace and testing in accordance with CDC guidance, e.g.,** • Employees encouraged to self-identify symptoms • In order to enter a workplace, employees, service providers, visitors, contractors, etc. are required to complete health screening (e.g., questionnaire, temperature check), either at home or upon entry to the workplace (flexibility needed due to different types of businesses); those who don't pass screening or become ill in the workplace referred to self-quarantine and/or get tested, based on CDC guidance • Testing required in accordance with any CDC guidance; for other employees, testing is generally not a pre-condition to work, but permit flexibility for employers to implement additional testing		
	Tracing and tracking	**Conduct contact tracing and tracking procedures within the workplace, e.g.,** • If employees test positive for COVID-19, trace likely contacts in the workplace, notify employees to isolate & self-quarantine, per CDC guidance; permit flexibility for employers on presumed positive cases		
	Communication	**Continuous reporting protocols, e.g.,** • Notify public health officials, employees, and/or the general public of important health information and relevant safety measures as outlined in government guidelines		

* Guidelines should apply to non-essential services upon reopening. Essential services should come into compliance with any issued guidelines as soon as possible, but will require adequate time to implement and critical resources in place prior to enforcing in guidelines issued for Phase 1.

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Exhibit 2B: Guidelines to be tailored by environment | Example: Retail

		Phase One*	Phase Two	Phase Three
Movement and Activity	Workplace activity	**Limit in-person work and minimize employee contact where possible, e.g.,** • Reduced store hours (to enable enhanced cleaning and precautionary operating procedures) • Design shifts (A/B teams or staggered arrival/departure) to minimize contact across employees, prevent congestion at entry points • Employee handling of merchandise and contactless shopping where possible (e.g., home delivery or curbside staging) • Limit visitors and service providers on site; shipping and deliveries completed in designated areas, curbside if possible		**All work and activities allowed, e.g.,** • Normal store hours and work shifts
	Gathering size	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**No constraints on gathering size**
	Physical distancing	**Ensure >6 ft between individuals where possible unless this creates a safety hazard, e.g.,** • Visual distancing markers for customers in checkout line; guide flow of store traffic with markers; utilize public address reminders • Restrict occupancy to allow 6 ft between patrons, taking into consideration the size of different retail stores • Close or reconfigure (if possible) high density areas of stores where employees are likely to congregate (e.g., break rooms)		**Targeted distancing measures, e.g.,** • Continue to visually indicate 6 ft separations • Members of vulnerable populations should limit physical contact
	Movement and commerce	**Limited travel, e.g.,** • Gradual increase in business travel focused on necessary business activities and with safety precautions	**Continued gradual travel increases with safety precautions, e.g.,** • Restrictions on travel to/from higher risk areas	
Public and Workplace Safety and Trust	Protective equipment	**Precautionary measures, e.g.,** • Face coverings required for all employees when 6 ft physical distancing cannot be maintained; gloves highly recommended for employees in frequent contact with others, or who work with food, handle money, etc. • Physical partitions at interior or in-store checkout stations where 6 ft between other employees or patrons cannot be maintained		**Proactive precautionary measures, e.g.,** • Employees continue to wear face coverings (and gloves) if interacting with customers, physical partitions at checkouts
	Hygiene and cleaning	**Cleaning and hygiene standards, e.g.,** • Disinfecting of contacted surfaces daily and deep cleaning of exposed areas in event of a presumptive or confirmed positive case • Frequent disinfecting of heavy transit areas and high-touch surfaces (e.g., doorknobs, elevator buttons, vending machine, bathrooms) • Cashless transactions encouraged as default at checkout • Cleaning/hygiene training required for store employees, with new work routines • Shared spaces (e.g., break rooms) cleaned between use and supplied with cleaning products (e.g., sanitizer, disinfecting wipes)		
	Special measures for vulnerable population	**Protection for members of vulnerable populations, e.g.,** • Designated store hours for vulnerable populations (continued in Phase Two and reduced in Phase Three) • Consider accommodations for vulnerable populations, or those interacting with them, to have designated separate workspaces, adjusted hours and provision of additional protective equipment • Pursuant to ADA / any state disability laws, work with vulnerable population employees to see if they need any adjustments to their job (e.g., shift to positions with lower contact with other individuals)		
Monitoring	Screening and testing	**Continuous health screening to enter workplace and testing in accordance with CDC guidance, e.g.,** • Employees encouraged to self-identify symptoms • To enter a workplace, employees, service providers, visitors, contractors, etc. are required to complete health screening (e.g., questionnaire, temperature check), either at home or upon entry to the workplace (flexibility needed due to different types of businesses); employees who don't pass screening/become ill in the workplace referred to self-quarantine and/or get tested, based on CDC guidance • Testing required in accordance with any CDC guidance; for other employees, testing is generally not a pre-condition to work, but permit flexibility for employers to implement additional testing		
	Tracing and tracking	**Conduct contact tracing and tracking procedures within the workplace, e.g.,** • If employees test positive for COVID-19, trace likely contacts in the workplace, notify employees to isolate & self-quarantine, per CDC guidance; permit flexibility for employers on presumed positive cases		
	Communication	**Continuous reporting protocols, e.g.,** • Notify public health officials, employees, and/or the general public of important health information and relevant safety measures as outlined in government guidelines		

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* Guidelines should apply to non-essential services upon reopening. Essential services should come into compliance with any issued guidelines as soon as possible, but will require adequate time to implement and critical resources in place prior to enforcing in guidelines issued for Phase 1.

EXAMPLE – ILLUSTRATIVE. WORKING DRAFT FOR DISCUSSION. MEASURES TO BE DEFINED BY PUBLIC HEALTH EXPERTS.

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Exhibit 2C: Guidelines to be tailored by environment | Example: Manufacturing

		Phase One*	Phase Two	Phase Three
Movement and Activity	Workplace activity	**Limit in-person work and minimize employee contact where possible, e.g.,** • Gradual/phased return to in-person work, continuing to adjust operations and work scheduling (A/B teams or designated arrival/departure) to reduce density in the facility, minimize contact across employees and prevent congestion at entry points • Limit visitors and service providers on site; shipping and deliveries completed in designated areas, outside the facility if possible		**All work and activities allowed, e.g.,** • Normal hours and work shifts
	Gathering size	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**No constraints on gathering size**
	Physical distancing	**Ensure >6 ft between individuals where possible unless this creates a safety hazard, e.g.,** • Visual distancing markers on workstations to delineate 6 ft separations; markers throughout facility to guide movement of individuals • Close or reconfigure (if possible) high density areas of facilities where employees are likely to congregate (e.g., break rooms) to allow physical distancing, cafeterias may operate to feed employees with physical distancing and appropriate hygiene measures • Workers assigned designated work areas (e.g., floor, building, factory zone); improve ventilation for enclosed spaces where possible		**Targeted distancing measures, e.g.,** • Continue to visually indicate 6 ft separations • Employees encouraged to limit time in common spaces • Members of vulnerable populations should limit physical contact
	Movement and commerce	**Limited travel, e.g.,** • Gradual increase in business travel focused on necessary business activities and with safety precautions	**Continued gradual travel increases with safety precautions, e.g.,** • Restrictions on travel to/from higher risk areas	
Public and Workplace Safety and Trust	Protective equipment	**Precautionary measures, e.g.,** • Face coverings required for all employees when 6 ft physical distancing cannot be maintained, except where doing so may introduce a safety hazard to the employee; gloves highly recommended for cleaning or for individuals working with food • Recommend physical partitions separating workstations that cannot be spaced out, where feasible		**Proactive precautionary measures, e.g.,** • Face coverings recommended for all facility employees, especially members of vulnerable populations
	Hygiene and cleaning	**Cleaning and hygiene standards, e.g.,** • Disinfecting of contacted surfaces daily and deep cleaning of exposed areas in event of a positive case • Frequent disinfecting of heavy transit areas, heavy machinery and high-touch surfaces (e.g., doorknobs, handrails, shared tools, bathrooms) • Ensure access to handwashing facilities on site, including soap and running water, wherever possible and encourage frequent handwashing, or supply employees at workplace location with adequate cleaning products (e.g., sanitizer, disinfecting wipes)		
	Special measures for vulnerable population	**Protection for members of vulnerable populations, e.g.,** • Consider accommodations for vulnerable populations, or those interacting with them, to have designated separate workspaces, adjusted hours and provision of additional protective equipment • Pursuant to ADA / any state disability laws, work with vulnerable population employees to see if they need any adjustments to their job (e.g., shift to positions with lower contact with other individuals)		
Monitoring	Screening and testing	**Continuous health screening to enter workplace and testing in accordance with CDC guidance, e.g.,** • Employees encouraged to self-identify symptoms • In order to enter a workplace, employees, service providers, visitors, contractors, etc. are required to complete health screening (e.g., questionnaire, temperature check), either at home or upon entry to the workplace (flexibility needed due to different types of businesses); those who don't pass screening or become ill in the workplace referred to self-quarantine and/or get tested, based on CDC guidance • Testing required in accordance with any CDC guidance; for other employees, testing is generally not a pre-condition to work, but permit flexibility for employers to implement additional testing		
	Tracing and tracking	**Conduct contact tracing and tracking procedures within the workplace, e.g.,** • If employees test positive for COVID-19, trace likely contacts in the workplace, notify employees to isolate & self-quarantine, per CDC guidance; permit flexibility for employers on presumed positive cases		
	Communication	**Continuous reporting protocols, e.g.,** • Notify public health officials, employees, and/or the general public of important health information and relevant safety measures as outlined in government guidelines		

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Exhibit 2D: Guidelines to be tailored by environment | Example: Construction

		Phase One*	Phase Two	Phase Three
Movement and Activity	Workplace activity	**Limit in-person work and minimize employee contact where possible, e.g.,** • Adjust work scheduling, hours and shifts (A/B crews or designated arrival/departure) to reduce density at the work site, minimize contact across employees and prevent congestion at entry points • Limit visitors and service providers on site; shipping and deliveries completed in designated areas to minimize interactions • Organize the placement of materials to minimize movement on the work site		**All work and activities allowed, e.g.,** • Normal hours and work shifts
	Gathering size	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**Limitations per federal guidance, unless distancing and/or protective equip. measures below are in place**	**No constraints on gathering size**
	Physical distancing	**Ensure >6 ft between individuals where possible unless this creates a safety hazard, e.g.,** • Identify choke points where workers are likely to congregate (e.g., break areas, hallways, hoists, stairways) and close these spaces or ensure 6 ft distancing policies are in place, such as markers to direct movement – unless it is a safety hazard to maintain distance • Workers assigned designated work areas		**Targeted distancing measures, e.g.,** • Identify choke points and ensure distancing policies are in place • Members of vulnerable populations should limit physical contact
	Movement and commerce	**Limited travel, e.g.,** • Gradual increase in business travel focused on necessary business activities and with safety precautions	**Continued gradual travel increases with safety precautions, e.g.,** • Restrictions on travel to/from higher risk areas	
Public and Workplace Safety and Trust	Protective equipment	**Precautionary measures, e.g.,** • Face coverings for workers in frequent contact with others, in close quarters, or where 6 ft physical distancing is not possible (e.g., elevator or hoist operators)		**Proactive precautionary measures, e.g.,** • Face coverings recommended for all workers on site, especially members of vulnerable populations
	Hygiene and cleaning	**Cleaning and hygiene standards, e.g.,** • Disinfecting of contacted surfaces daily (where possible) and deep cleaning of exposed areas in event of a positive case • Frequent disinfecting of heavy transit areas and high-touch surfaces (e.g., shared tools, machines, vehicles, handrails, portable toilets) • Ensure access to handwashing facilities on site, including soap and running water, wherever possible and encourage frequent handwashing, or supply employees at workplace location with adequate cleaning products (e.g., sanitizer, disinfecting wipes) • Provide training to workers on up-to-date safety information and precautions		
	Special measures for vulnerable population	**Protection for members of vulnerable populations, e.g.,** • Consider accommodations for vulnerable populations, or those interacting with them, to have designated separate workspaces, adjusted hours and provision of additional protective equipment • Pursuant to ADA / any state disability laws, work with vulnerable population employees to see if they need any adjustments to their job (e.g., shift to positions with lower contact with other individuals)		
Monitoring	Screening and testing	**Continuous health screening to enter workplace and testing in accordance with CDC guidance, e.g.,** • Employees encouraged to self-identify symptoms • In order to enter a workplace, employees, service providers, visitors, contractors, etc. are required to complete health screening (e.g., questionnaire, temperature check), either at home or upon entry to the workplace (flexibility needed due to different types of businesses); those who don't pass screening or become ill in the workplace referred to self-quarantine and/or get tested, based on CDC guidance • Testing required in accordance with any CDC guidance; for other employees, testing is generally not a pre-condition to work, but permit flexibility for employers to implement additional testing		
	Tracing and tracking	**Conduct contact tracing and tracking procedures within the workplace, e.g.,** • If employees test positive for COVID-19, trace likely contacts in the workplace, notify employees to isolate & self-quarantine, per CDC guidance; permit flexibility for employers on presumed positive cases		
	Communication	**Continuous reporting protocols, e.g.,** • Notify public health officials, employees, and/or the general public of important health information and relevant safety measures as outlined in government guidelines		

* Guidelines should apply to non-essential services upon reopening. Essential services should come into compliance with any issued guidelines as soon as possible, but will require adequate time to implement and critical resources in place prior to enforcing in guidelines issued for Phase 1.

Exhibit 3A: Key questions for developing guidelines | Movement and activity

	CATEGORY	EXAMPLE QUESTIONS
Movement and Activity	Workplace activity	• What non-essential workplaces should re-open in each phase, recognizing that flexible workplaces (e.g., telework) and work hours (e.g. staggered shifts) will be widely implemented where possible?
	Gathering size	• How should gatherings be defined, relative to the nature and size of the environment (e.g., multi-level office building vs. factory floor), particularly in workplaces where the number of customers and/or employees exceed current CDC guidance? • When should gathering size restrictions be adapted to reflect other precautions in place (e.g., protective equipment usage, distancing), particularly in workplaces where stated limits are not feasible?
	Physical distancing	• When the minimum physical distance is not possible to achieve (e.g., due to workplace configuration or other workplace safety considerations), what measures can be used to allow for proximity without risking exposure (e.g., partitions for cashiers)? • What are recommended approaches for reducing constriction points, such as access times, alternating in-person and virtual shifts, and governance of elevator / stairwell / other constricted areas?

Exhibit 3B: Key questions for developing guidelines | Safety and trust

	CATEGORY	EXAMPLE QUESTIONS
Public and Workplace Safety and Trust	Protective equipment	• How should protective equipment usage and provision vary in specific circumstances, including: differences between customer-facing roles and non-customer-facing roles, types of approved equipment, exemptions when protective equipment creates safety risks from visibility restrictions/communication impairment, and situations where work in close quarters is unavoidable?
	Hygiene and cleaning	• What are the procedures, schedules, and types of disinfectants recommended for COVID-19 cleaning at workplaces? How do these procedures vary across situations (i.e., routine cleaning vs. deep cleaning an area after known exposure to a positive case)? • What occupancy, cleaning and disinfection protocols should be in place where there is a suspected or confirmed case?
	Special measures for vulnerable population	• Does the definition of vulnerable individuals from the recent Opening Up America Again federal guidance apply in this context? If so, does the CDC definition of 65 or older apply when considering "elderly individuals" in Opening Up America Again? • What actions are recommended to protect vulnerable individuals and their caretakers, including extra protections at work if they cannot work from home, and how should employers resolve any conflicts between such actions and the Americans with Disabilities Act, Equal Employment Opportunity Commission guidance, and similar regulation and federal policies?

Exhibit 3C: Key questions for developing guidelines | Monitoring

	CATEGORY	EXAMPLE QUESTIONS
Monitoring	Screening and testing	• What are recommended health screening tools (e.g., temperature checks, health questionnaires)? • Who should be screened (e.g., employees, vendors, customers) in accordance with the Americans with Disabilities Act (ADA), HIPAA, and similar laws and regulations? • Who should be tested and at what frequency?
	Tracing and tracking	• What are the appropriate actions when it is identified that employees have come in contact with an infected individual? • Can employers require the use of tracing apps for workers and/or customers? What technology solutions are appropriate? • How should these policies be designed to account for Americans' privacy and relevant laws and regulations (e.g., ADA and HIPAA)?
	Comm-unication	• What data should be collected and used with respect to COVID-19, in compliance with data privacy laws and with whom should the data be shared with (e.g., alerting local officials after every positive test)? • What guardrails should be put in place to ensure that data collected for COVID-19 monitoring is not used for other purposes and deleted after a certain timeframe (if applicable)? • When and how (including format and content) should impacted parties (e.g., employees, public health authorities, general public) be notified in the case of a COVID-19 outbreak and implementation of appropriate safety measures?