

# Return-to-Work Checklist for Health Care Employers Reopening Their Businesses

Article By:

Faith C. Whittaker

H. Devon Collins

---

The following are general considerations for health care employers who are strategizing their employees' return to work. Note that each employer and health care environment is different and will need a specifically tailored plan. Further, there is a wealth of detailed guidance regarding various aspects of operating during the COVID-19 pandemic, including detailed guidance regarding proper PPE and patient treatment. The following information is a starting point for employers and focuses on issues related to employment policies and practices.

## **SOCIAL DISTANCING**

- Consider staggering the times when employees return.
- Maintain teleworking and/or flexibility with employees' schedules.
- Continue to maximize use of virtual communications in place of in-person meetings.
- Rethink holding any in-person events with mass gatherings and consider hosting events virtually or rescheduling.
- Increase physical space between employees and patients in the workplace.
  - As an example, have a maximum number of individuals who may enter a breakroom, conference area, or lobby.
  - Place physical markers in high-traffic areas to keep people six feet apart.
  - Where possible, erect clear shields/barriers for employees whose work prevents them from being physically distant from patients, such as receptionists.
  - Rearrange work spaces to permit greater social distancing.

- 
- Consider whether furniture and equipment can be reconfigured to facilitate social distancing.
  - Develop protocols for elevator use.
  - Stagger break and lunch times and plan for longer break times to accommodate the social distancing measures.
    - Permit employees to leave the facility during meals and breaks to increase social distancing.
  - Discourage social practices that violate social distancing rules, such as handshakes.

---

## **CLEANING, PROTECTION & HYGIENE**

- Place proper handwashing protocol posters in all common work areas and in restrooms.
  - Be flexible with employees' breaks to allow for frequent handwashing.
- Include additional sanitation measures for the facility, especially in common areas and for frequently touched surfaces or shared equipment.
- Require employees to disinfect common surfaces following use, as appropriate.
- Provide hand sanitizer, disinfecting wipes, and proper disposal in all common areas and at work stations where employees cannot leave to wash their hands between interactions with the public.
- Health care providers should perform hand hygiene before and after all patient contact, contact with potentially infectious material, and before putting on and after removing PPE, including gloves.
- Provide appropriate PPE for each employee and require appropriate PPE be utilized. Selection of appropriate PPE must be in accordance with OSHA PPE standards.
- Ensure employees are trained with current guidance on proper use of PPE.
- Continue to encourage employees to observe infection-control practices, such as regular handwashing, coughing, and sneezing etiquette.
- Coordinate with facility maintenance to increase air exchanges in facilities.

---

## **POLICIES**

- Review and update attendance, leave-of-absence, Family Medical Leave Act, and PTO policies to prepare for COVID-19 absences.
- Create a policy or procedure for when employees diagnosed with COVID-19 or suspected of

---

having COVID-19 can return to work.

- Adopt policies governing when health care providers with confirmed or suspected COVID-19 may return to work in accordance with [Interim Guidance on Criteria for Return to Work for Health Care Personnel with Confirmed or Suspected COVID-19](#).
- Review and update any teleworking and accommodation policies or procedures.
- Develop and implement procedures to track any positive cases to provide proper notification for those exposed and to prevent further spread.
- Update procedures for reporting any safety issues.
- Review time-keeping procedures to ensure they allow for social distancing and adequately recording working time.
- Review and update safety policies and clearly communicate new rules and procedures to employees in writing.
- Require training on updated safety procedures for employees.
- Train supervisors on how to monitor compliance with and enforce new rules and procedures.
- Ensure employees understand these policies and have employees acknowledge receipt of training, rules, and procedures.

---

## EMPLOYEE & VISITOR SCREENING

- If visitors are permitted in the facility, limit visitors to only those essential for the patient's physical or emotional well-being and care (e.g., care partners).
- Encourage use of alternative mechanisms for patient and visitor interactions such as video-call applications on cell phones or tablets.
- If visitors are permitted:
  - Limit points of entry to the facility and visitation hours to allow screening of such visitors.
  - Actively assess all visitors for fever and COVID-19 symptoms upon entry to the facility. If fever or COVID-19 symptoms are present, the visitor should not be allowed entry into the facility.
  - Establish procedures for monitoring, managing, and training all visitors, which should include: (1) All visitors should be instructed to wear a facemask or cloth face covering at all times while in the facility, perform frequent hand hygiene, and restrict their visit to the patient's room or another area designated by the facility; (2) Informing visitors about appropriate PPE use according to current facility visitor policies.

- 
- Institute safe screening practices for employees prior to entrance into the facility.
    - Place conspicuous messaging preventing employee entrance if sick, and provide alternatives for the visually impaired.
    - Ensure there is an option in Spanish and/or other languages.
    - Create practices to ensure that hourly, non-exempt employees are compensated for health screening time if required under federal, state, or local law.
  - Mandate that employees with symptoms stay home from work and follow employer call-in procedures.
  - Implement temperature checks upon entrance in a safe and confidential manner.
  - Follow federal, state, and industry guidance for monitoring, including testing employees for COVID-19. Health care providers with suspected COVID-19 should be prioritized for testing. Depending on availability, employers may consider regularly scheduled COVID-19 testing practices for employees.
  - Be mindful of privacy concerns and any necessary accommodations.
  - Consider suspending or reconfiguring security practices that require touching frequently touched surfaces, such as PIN-entry devices, thumbprint scanners, time clock stations, and in sign-in books.

---

## **ADDITIONAL CONSIDERATIONS**

- Stay aware of continuing restrictions from federal, state, and local public health organizations, and remain compliant with public health orders.
- Develop a strategy for workers who decline to return to work or need additional time off.
- Be mindful of responsibilities under the Payroll Protection Program and other support programs for returning employees to work.
- Prepare to follow the interactive process for accommodation requests under the Americans with Disabilities Act or state equivalent regarding returning to work and/or any of the safety measures.
  - Accommodations may include additional PPE, remote work, alternative scheduling, alternate work locations, alternate work assignments, increased social distancing, and leaves of absence.
- Ensure the extra safety precautions do not violate wage and hour laws.
- Be mindful of anti-discrimination and anti-retaliation laws when returning employees and addressing safety issues.

- Prepare a contingency-operation plan to address an increased outbreak or spike in infections as restrictive measures are loosened.
- Be cognizant of rights and obligations under collective bargaining agreements.
- Encourage employees to raise questions or concerns and designate an employer representative to engage in dialogue with employees.

© 2025 Dinsmore & Shohl LLP. All rights reserved.

---

National Law Review, Volume X, Number 156

Source URL: <https://natlawreview.com/article/return-to-work-checklist-health-care-employers-reopening-their-businesses>