

COVID-19 Business Recovery

Decision-Making Tool Kit



Letter to Our Readers

COVID-19 is a pandemic affecting more than 185 countries simultaneously. Unlike other crisis events which have a defined start/stop date and a period of recovery afterwards, COVID-19's event arc is different. COVID-19 is anticipated to cycle through what may be multiple waves of infection with local governments implementing intervention strategies to flatten the curve (and prevent health care systems from becoming overwhelmed), then easing the interventions when the curve comes down (to allow economic activity), and then re-introducing interventions when the curve rises again. These waves are likely to occur at different times and different intensities in different geographies until such time as a vaccine is created or a treatment protocol is found to be effective. An organization whose operations span multiple geographies will have a unique COVID-19 experience that is specific to their footprint and business profile.

Given the fluid nature of COVID-19, the challenge to organizations is how to resume business and bring employees back to a safe workplace and still enable flexible expansion and contraction of on-site work to address the impact of waves.

The purpose of this Business Recovery Tool Kit is designed to focus on the recovery part of the equation. It is intended to complement Aon's Business Continuity Tool Kit which focused on preparation and response stages, and Aon's Employer Best Practices-COVID-19 Screening document which recognizes that COVID-19 screening is a key part of any workforce and business resilience discussion. Taken together, all three documents form a view that enables an organization to flex as needed to address waves and enhance resilience.

Infectious disease, by its very nature, is an evolving topic. As such, statements made in this Tool Kit are specific to the current level, date of issuance, and impact of the outbreak in a particular region. Aon is not responsible for the accuracy of the information nor for an organization's use of or reliance on Aon's statements.

The statements provided herein are of a general nature and in no event a legal opinion or medical advice. Any recipient shall be responsible for the use to which it puts this document and Aon cannot be held liable for the guidance provided. Aon recommends an organization consults with its legal advisor and seek additional safety, medical and epidemiologic information from credible sources such as the Centers for Disease Control and Prevention and the World Health Organization before taking any action based upon Aon's statements contained herein.

Beyond this Tool Kit, Aon is prepared to support clients across a spectrum of COVID-19-related needs including return to workplace strategies and actions, risk financing and liquidity, claims (advocacy & preparation), captive utilization, insurance renewal support and total cost of risk reduction amongst many others. For support implementing the content in this Tool Kit and other COVID-19 needs, Aon's resources are available for further discussion and can assist organizations with one-to-one meetings under a mutually-agreed consulting contract.

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Impact of COVID-19

COVID-19 has affected almost every aspect of global business operations including processes, people, and technology. Furthermore, as mentioned in our Letter to Our Readers, COVID-19's event arc is different from most crisis events. COVID-19 is anticipated to cycle through what may be multiple waves of infection, with local governments implementing intervention strategies to flatten the curve, then easing the interventions when the curve comes down, and then re-introducing interventions when the curve rises again until such time as a vaccine is created or a treatment protocol is found to be effective.

This Business Recovery Tool Kit is designed to focus on the recovery part of the equation. It is intended to complement Aon's [Business Continuity Tool Kit](#) which focused on preparation and response stages, and Aon's [Employer Best Practices-COVID-19 Screening document](#) which recognizes that COVID-19 screening is a key part of any COVID-19-related workforce and business resilience discussion. Taken together, all three documents form a view that enables an organization to flex as needed and enhance resilience.

As the cases and infections begin to subside, considerations and plans are needed to consider how to return the business to normal or a "new normal." Just as this event prompted significant strategic and tactical decisions and action plans across the entire organizational matrix and enterprise operations, so too the recovery stage requires equally focused strategic and tactical decisions and action plans.

Specifically, transitioning to recovery and the new normal will involve reverse engineering activation plans and response and recovery decisions, as well as reviewing learnings from this event to ensure that operations and business continuity capabilities are stronger and more mature going forward. Actions taken now will ensure a higher level of readiness, preparedness, and maturity with response and recovery in order for the business to flex as needed as COVID-19 continues to unfold.

What Should My Organization Be Doing?

Transitioning to recovery will require discussion around multiple phases for successfully standing down the react and respond actions and then recovering business operations and preparing to flex as needed with event waves. Recommended multiple phases include the following:

- Government Mandates and Other External Factors:
 - Status of government mandates &/or guidelines for "lockdowns" and "sheltering-in-place" for communities and "essential" and "non-essential" businesses.
 - Ensuring compliance with all local, state, and federal restrictions, regulations and laws (including industry standards) with the potential transition back to business; being prepared to flex as situation changes.

- Employees:
 - Status of employees and their families – prepared to return to on-site work environments (e.g., have employees made arrangements for child care if schools/day cares remain closed; etc.) – collaboration with Human Resources to ensure protection of employees’ privacy of health information.
 - Possible virus screening if appropriate.
 - Protecting employee health information through thorough compliance with HIPAA.
 - Is new hiring required? Permanent or temporary workers? Collaboration with HR.
 - Consider possible need to simultaneously facilitate a work from home strategy and transition back to on-site work operations– what are the ramifications of that strategy and protocols relative to supervisory support on-site and continuity of operations?
- Customers:
 - Are customers ready to receive products and services? If so, in what quantities?
 - How will we ensure we still meet service level expectations as we move back to normal operations?
 - Significant issues required around starting specific function areas and all the resources required to restore those operations.
 - Ensuring compliance with all industry standards, policies, and regulations.
- Vendors:
 - Status of critical vendors that support our organizations’ critical business processes – are they prepared to also return to normal business operations?
- Infrastructure and Assets:
 - Facilities on-site made safe and ready to open to employees.
 - Can we provide Personal Protective Equipment (PPE) for returning employees – Masks, Hand Sanitizer, etc.
 - Are technology changes made during the response able to shift back to on-site technology environments? Manage both remote and on-site operations?
 - What are our physical security needs now at the on-site locations?
- Final Approval and Sign-Off:
 - Engagement of leadership to review and approve recommendations for transitioning back to work sites and normal operations.

In this document, considerations needed to reverse-engineer and plan for the return to normal business operations will be presented.

Immediate COVID-19 Recovery of Business

Incident/Crisis and Recovery Management

The cross-functional team of leaders will remain in place to begin the multi-phase stand down process. With the designated Pandemic Team and/or COVID-19 Coordinator's guidance, recommendations must be made about how to transition to recovery and the new normal, and to enable ability to flex when needed. The path toward getting to those recommendations will include some of the following phases:

Government Mandates and Other External Factors

- COVID-19 Coordinator will continue to manage and collect information/data on the following:
 - Continued monitoring of pandemic news and status at all affected company locations; includes local, state, CDC and WHO information at all critical sites.
 - Confirm that the business is allowed to reopen and return to business at the work site per landlord &/or property manager.
 - Confirm that the business is in compliance with local, state, and federal restrictions, regulations, and laws prior to transitioning to normal operations.
 - Engage the Crisis Management team to recommend the path forward for transition back to the work site.
- Continue meetings (virtual as needed) to stay abreast of COVID-19 as it continues to evolve, and to remain current on any other crisis events (such as natural hazard events) that may occur and potentially alter/amplify the impact on the organization.
 - Review status of pandemic (globally, nationally, & locally).
 - Issues, government mandates, and restrictions still affecting company operations.
 - Review status of other events which may occur simultaneously with COVID-19 impacts and may require adjustment to COVID-19 recovery planning at one or more sites.
- Coordinate activities with authorities
 - Review WHO and CDC announcements.
 - Coordinate with state, county and local departments of health.
 - Work with vendors, suppliers and customers to stay updated on their current state with recovery and returning to normal operations.

Employees

- Coordinating workplace health and safety with Facilities Management and Physical Security. Tasks the “COVID-19 Coordinator(s)” may perform include:
 - Designing & implementing virus testing protocols to monitor returning employees – Collaborating with Human Resource to ensure HIPAA compliance is in place and health information privacy is protected – See Companion Document: Aon’s Employer Best Practices-COVID-19 Screening for more information.
 - Setting up a process to facilitate / encourage the return of employees to the workplace once they are better or at the end of a quarantine period.
- Collaborate with cross-functional leaders to outline the staffing plan for critical functions operating both remote and back on-site.
 - Determine needs and changes required for critical functions (based on validated vendor &/or customer status) and prepare plans for those new needs.
 - Determine if all employees supporting the critical functions are available to return (e.g., are some still sick, no longer available, well and ready to return).
- Identify any non-essential functions and staff that can now start returning to on-site work environments.
 - Determine any changes to needs for non-essential functions and prepare plans for those new needs.
 - Ensure there is a proper span of control between supervisors and staff upon return to on-site operations.
 - Determine if all employees supporting the non-essential functions are available to return (e.g., are some still sick, no longer available, well and ready to return).
 - Transition of people from remote work to on-site work – staff planning needed by each critical business functions/process owner.

Vendors

- Survey vendors to determine their ability and possible timing to manufacture and ship products &/or services and in what quantities.
- Validate logistics availability to receive shipments.
- Based on customer supplied data, possibly recalibrate vendor relationships and agreements.

Customers

- Survey customers to determine their ability to receive products &/or services and in what quantities.
- Address customer concerns and maintaining continuity of critical operations and services.
- Continuing incoming customer inquiries on current state of operations and recovery, as well as other customer concerns regarding delivery of products, services, and operations.
- Based on vendor ability to perform and internal operational issues possibly renegotiate customer orders &/or timing of shipments.

Critical Operations

- Pandemic Team and COVID-19 Coordinator report on status to Crisis Management leadership on continued coverage and delivery of all core business functions.
- Engage all critical business function and process owners/leaders to begin their review of their current staffing and plan for each critical function and its transition back to normal operations.
- Discuss new operational needs/changed needs for critical functions – have a deep-dive discussion into how resource needs have changed, real estate needs have changed, technology needs have changed, etc.
- Continue Virtual Emergency Operations Center (EOC) as needed when co-location and alternate sites are not viable.
 - Conference bridge
 - Web / net meetings
- Succession planning with delegation of authority (e.g., how much authority will the delegated leader have while standing-in for the primary leader?)
 - For transitioning on-site supervisors available to manage transitioning on-site staff (e.g., previous/original supervisors may not be the same ones that transition back to the work site – what authority will they have?)
 - For senior management
 - For crisis management team

Infrastructure and Assets

- Coordinating workplace health and safety with Facilities Management to continually clean and disinfect the work site.
- Discuss possible continuance of social distancing at the work site. May not be able to sit/work/eat within 6 feet of coworkers like pre-COVID-19.
- Determine need for providing Personal Protective Equipment for returning employees (e.g., Masks, Hand Sanitizer, etc.).
- Verify that the Information Technology group is to handle both on-site and remote work services and systems.
- For employees that had to take office equipment home in order to work remotely, how will we ensure all the equipment is returned to the office and that computer security issues (e.g., computer viruses etc.) are addressed?
- Determine physical security needs once we transition back to work site. Does our contract security company have enough staff to cover the physical security needs during and after the transition back to the work site?

Final Approval, Sign-Off, and Next Steps

- Pandemic Team and COVID-19 Coordinator continues to provide information (e.g., critical function needs, staff requirements, resource essentials, and critical vendor/supplier statuses) to a cross-functional team of leaders (e.g., the Crisis Management Team) to address and determine a path forward.
- Address all vulnerabilities and gaps that result from discussion – outline the risks with vulnerabilities and gaps and offer alternatives where possible.
- Define strategic and tactical path forward and recommendations for returning to business at the work site.
- Gain consensus and approval from Crisis Management leadership, and secure sign-off on return to business plans.
- Post-event, schedule and facilitate a “learning” session with key COVID-19 event response and recovery team members to capture:
 - The actions and tasks that went well.
 - The actions and tasks that require adjustment for future waves.
 - The actions and tasks that failed and need immediate attention.
 - Assign these action items to team members for resolution.
 - Capture and report overall lessons learned and plans for updates to Crisis Management, Crisis Communications, Business Continuity, and Information Technology Disaster Recovery plans, training, and exercises going forward.

Crisis and Recovery Communication

Transitioning back to normal and on-site operations will require timely, accurate, and appropriate Crisis and Recovery Communications. It is important to maintain information flow and accurate instructions and guidance to all employees during this transition.

It is critical for organizations to maintain clear lines of communications with their employees, as well as customers, clients and third-party entities. The following checklist is provided to help organizations quickly identify key communications best practices should a need arise.

Identify critical stakeholders:

- Employees and contractors
- Ownership / Stockholders / Board of Directors
- Customers / Clients / Joint Ventures
- Vendors / External Advisors (legal, tax, insurance)
- Regulators
- General public
- Public / private entities

And determine:

- What is the frequency necessary to communicate during the transition? What are the communication channels that will be most effective at this time—email, internet, intranet, text messaging, teleconferences or video conferences, instant messaging, mobile apps and mobile device notifications, printed material sent home, printed materials on site, etc.?
- How to provide information to employees on how the transition (all at once or staggered) will proceed. Which teams will return to the work site, and prioritization of business functions. Employees will want to know their specific transition date so they can prepare.
- What is the company's message and/or instructions/guidance? The information needs of various audiences should be anticipated.
- Who within the organization should be assigned the responsibility to communicate? Is it different depending on the stakeholder?
- How will we verify that the message is received and understood in the manner intended?

Another item to consider is to ensure you have updated employee information to include the latest contacts, phone numbers (mobile, home), email, etc. You want to ensure that all employees get the necessary information they need about the COVID-19 response and protocols.

Your intranet is a resource to communicate with employees. Consider the following:

- If you set up a dedicated spot on your intranet site to share COVID-19 related information, can you segment that site by audience? As different geographies and facilities reopen at different times, are you able to filter information so it only appears for the relevant audiences?
- Who owns communicating about sites reopening i.e., is it corporate communications, corporate real estate, or local management?
- If posted on intranet site, does the information need to be translated?

Crisis and Recovery Communication Messages

Employee Considerations:

- There may still be a high level of fear, anxiety, rumors, and misinformation regarding COVID-19 and returning to the work site. Regularly sharing response information including facility preparation for return-to-normal may reduce employees distress.
- See additional employee communication considerations in the Human Resources – Employee Communication section of this Tool Kit.

Customer/Client Considerations:

- Prepare regularly scheduled updates on the organization's actions and progress while protecting customers/clients' interests.
- Collaborate with the appropriate cross-functional teams to answer all inquiries accurately and succinctly without compromising proprietary information.
- Ensure continuity of operations during the transition back to the work site based on acknowledged need and ability to perform.

Other Return to the Work Site Considerations

- Cleanliness of the facility and status of physical security.
- Work area staging / social distancing.
- Maintain health safety and protections with offerings of some PPE (e.g., Masks, Hand Sanitizer, etc.).
- Staffing plans – who returns to the work site and who must continue remote work.
- Supervisors to work on-site (may not necessarily be the same supervisors as before).
- IT support for not only employees working remotely, but also employees now transitioning to the work site. Those who are working remotely must inform their supervisor if they want to return to the work site, so planning can accommodate their return and transition.

Other Critical Policy and Procedure Considerations

While the company's Incident/Crisis Management team is working on the overall COVID-19 response, there are other parts of the organization that can play an instrumental role in planning and recovery and should be integrated into the plan for business restoration. The following sections (listed alphabetically) offer resource guidance for many of those specific business functions within the organization.

As the reader reviews the information provided, think about the organization and consider the necessary arrangements and plans to address the impact of COVID-19 on operations and protocols for possible business recovery.

Employee Virus Testing

[See here](#) for link to companion document: Employer Best Practices-Screening for COVID-19 for suggested best practice approach to testing.

Environmental, Health & Safety

As part of the mission of Facilities Management teams to deliver safe, comfortable, productive, and sustainable places for employees to work as the company resumes operations, it is important to consider increased or different exposures and appropriate mitigation strategies. Staying abreast of local, state and federal government regulations and guidelines and collaborating with internal operations teams, Facilities Managers and Environmental Health & Safety managers will consider how to protect the employees. The following are considerations for COVID-19 planning for this team. See also the Human Resources section of this Tool Kit for guidance on how Human Resources and Facilities Management work together on Health & Safety issues.

Increase Hygiene Management

- Refer to CDC guidelines for cleaning of the work environment, locker rooms, cafeteria areas and wash rooms; refer to CDC and EPA guidelines for acceptable cleaning materials. See below or consult the CDC website for a complete list. Modified janitorial practices for increased sanitation of frequently touched items may require increased training for employees new to these tasks. Cleaning procedures should be documented, and a log maintained.
- Continue to promote good hygiene practices (e.g., frequent hand washing and -- at least 20 seconds each time, with warm water and vigorous rubbing -- and use of hand sanitizer with at least 60% alcohol).
- Possible use of gloves and face covers as determined by Human Resources, local legislation and the organization's policies.
- Eye protection, gowns and/or aprons – depending upon the risk assessment for each job assignment.
- Requirement/provision of face mask/N95 or appropriate PPE.

Plan for Social Distancing

Develop workspace separations, or cut-off space within the work setting. Protective barriers can be accommodated with plastic sheets, or more substantial barriers. The recommended distance between people, according to the CDC, is at least 6 ft.

Consider reconfiguration of workspace including area, space planning, cut-offs and temporary separations.

Barriers for employees with public face-to-face encounter; in some cases, reduced public traffic areas may be considered (e.g. opening only alternate check-out lines for retail, continuing increased spacing on 'wait lines') for:

- Reception desks
- Counters
- Service line – cafeteria
- Elevator monitoring should be considered to limit the number of people in the elevator and/or limit use with access control measures

Consider alternative or staggered shifts, especially for operations that are sequential in nature.

Face-To-Face Barriers

- The number of employees who have regular face-to-face contact with the public that can provide services behind a barrier, by telephone, etc. is [client: insert number].
- Services that can be re-organized to be provided to the public without face-to-face contact are [client: insert number and type of service].
- Systems that can be put in place to minimize direct face-to-face contact with the public are [client: insert systems].

Considerations:

- Determine the circumstances under which employees will return to the work site based on operations and employee exposure risk assessments.
- Determine the screening procedures to be used for eligible returning employees (e.g. See Aon companion document: Employer Best Practices-COVID-19 Screening), and frequency of same. Ensure appropriate and consistent documentation following EEOC guidelines and with advice of employment legal counsel.
- Minimize situations where groups of people are crowded together, such as in a meeting.
- When meetings are necessary, avoid close contact by keeping a separation of at least 6 feet, where possible, use of face masks, and assure that there is proper ventilation in the meeting room.

- Workplaces which permit family visitors on site should consider restricting/eliminating that option during business resumption.
- Work sites with on-site day care should consider in advance whether these facilities will reopen or will remain closed, and the impact of such decisions on employees and the business.

Enhanced Safety Protocols

Safeguarding the health of employees, customers, vendors, and the public from COVID-19 is a key objective. Many returning employees may have job assignments that are new or have not been practiced in some time.

- Update the keyholder/card access to allow only those returning employees access to the facilities, based on need to access specific areas of the building or campus.
- Ensure the HVAC system is set to optimal levels for air movement and filtration based on recommended air exchange.
- Review job assignments for needs for additional Personal Protective Equipment based on new assignments.
- Review and inspect high-hazard areas such as flammable/chemical storage and electrical rooms to ensure physical hazard safeguards are in place.
- Consider safety-sensitive jobs and need for initial or recurrent training and certification where required:
 - Lockout procedures; consider lock inventory to ensure authorized employees have an adequate complement of locks in addition to training.
 - Powered Industrial Truck (forklift) training and permit issuance.
 - Crane operation training and permit issuance (where required).
- Review emergency procedures for all returning employees.
- Consider additional material handling equipment needs where social distancing is required (e.g. implications for ‘two-person lifts’).
- Establish cleaning procedures for material-handling equipment and limit to specific operations and or users.

Infection Control Supplies

Plan for and obtain an adequate supply of necessary infection control and Personal Protective Equipment:

- Soap within bathrooms
- Soap within kitchen areas
- Alcohol-based hand sanitizer (minimum 60% alcohol content)
- Paper towels
- Tissues
- Garbage bags and trash cans
- Office disinfectants
- Personal protective equipment
 - Gloves
 - Cleaning products (e.g., disposable wipes)
 - Hand Sanitizer (e.g., must contain at least 60% alcohol)
 - Safety-related PPE
 - Face masks or N95 respirators

Recommended Workplace Disinfectants

| Sodium Hypochlorite | Sodium Hypochlorite | Sodium Hypochlorite |
|--|--|--|
| <p>Sodium Hypochlorite One-part bleach to 100 parts of water, or 1:100 dilution. Usually achieved by ¼ cup bleach for 1½ gallons water.</p> | <ul style="list-style-type: none"> • Disinfection | <ul style="list-style-type: none"> • Should be used in well-ventilated areas • Utilize gloves while handling and using bleach solution • Do not mix with strong acids to avoid release of chlorine gas • Corrosive to metals and certain materials |
| <p>Alcohol (e.g. Isopropyl 70%, ethyl alcohol 60%)</p> | <ul style="list-style-type: none"> • Disinfection • Smooth metal surfaces, tabletops and other surfaces on which bleach cannot be used | <ul style="list-style-type: none"> • Flammable and toxic. To be used in well-ventilated areas. Avoid inhalation • Keep away from heat sources, electrical equipment, flames, and hot surfaces • Allow it to dry completely |
| <p>Insert EPA Approved Disinfectant</p> | <ul style="list-style-type: none"> • Follow directions on label | <ul style="list-style-type: none"> • Follow precautions on label |

Facilities Management

The extent of shutdown and the implementation of idle facilities procedures are two of the factors in determining the scope of work needed to bring physical plants back to operation. If a hard start is required, a very basic notion is to ensure that licensed contractors are consulted for items such as electric power, HVAC components, life safety and security systems. We also recommend contacting equipment manufacturers where appropriate.

The restrictions of social distancing caused by COVID-19 should be considered in the company's restart plans. Communicate existing COVID-19 protocols for Personal Protective Equipment, social distancing, etc. to all contractors that may need to be on premises in advance. In turn, determine what protocols they may have. Attention to planning between the organization and its contractors could save valuable time.

Changes in production/operations are often accompanied by changes in hazards. Changes to storage arrangements, hazardous materials handling, supply chain, etc, should be discussed with process safety and fire safety professionals.

Property Risk Control Precautions for Opening Idle Facilities

General

- Review and revise all emergency actions plans as necessary. Reassignments may be necessary due to employee turnover.
- All entrances to the site and buildings should be checked to assure that locks, hinges, frames, doors and windows are in good repair and operational. This should also include skylights, roof hatches, fences and gates. Be aware of signs of vandalism.
- Re-assign employees' access to keys to any entrances or sprinkler control valves. All employees that previously had keys that are being recalled, re-key those locks.
- Activate employee card readers to provide access to the site for all employees who had been laid off or furloughed.
- Emergency exits should be inspected to make sure they are fully operational.
- Prioritize the critical electrical components of the facility and inspect the incoming utility source.
- If power was turned off, proper lockout/tagout procedures should be used in accordance with NFPA 70E while energizing equipment, turning systems on in phases. It may be necessary to hire a certified electrical contractor to perform this work.
- Any buildup of trash, soiled work rags and other combustible debris should be removed from the facility.
- Inspect and test all fire sprinkler protection systems components and alarms using a certified sprinkler contractor.

- Physically turn on all sprinkler control valves larger than 1.5 in. (40mm) or controlling more than five sprinklers to make sure they are operational.
- Check all fuel sources (e.g., diesel fuel, gasoline, etc.) for water and other impurities that may cause a problem with operations.
- Verify that all fire doors can close automatically and have not been damaged.
- Inspect all critical boilers, pumps, chillers, cooling towers, ventilation and support equipment to make sure that they are in all good operating condition.
- The roofs, exterior of the buildings and the adjacent grounds should be inspected cleaned and repaired as needed. Particular attention should be paid to gutters and roof drains.
- Verify that all equipment related to flammable liquid or other hazardous materials are in good condition and in proper working order – ventilation, safety cans, bonding, grounding, containment, etc. Consider purging any lines with nitrogen before re-introducing a flammable liquid.
- Have a qualified safety specialist review the operations and perform appropriate risk assessments of any changed operations.

Electrical

- Have a certified electrical contractor inspect the physical integrity of the electrical system.
- Consider the use of a qualified infrared testing company for inspection of critical equipment.
- Inspect and test all UPS systems to make sure they are operational.
- Upon re-energizing, take amperage readings and compared with the pre-event readings to confirm that all systems are back in operation.
- Test all surge protection devices have been tested/inspected on the incoming electrical service.
- Test all protective relays and circuit breaker trip devices have been tested and calibrated.

Backup Power Supplies

- Test and inspect backup generators in accordance with NFPA 110.
- Exercise the transfer switches to make sure they are operational.
- Inspect/check the fuel, oil, coolant or exhaust leaks from the engines that may need attention.
- Test and inspect the batteries under load.
- Conduct a full-load test during which all electrical loads are transferred to the standby generators prior to reopening.

.External Security

- Check and illuminate the exterior and entrances to make sure they are operational.
- Test all motion-activated lighting near doors and windows.
- Remove any temporary installed signs around the building.
- Check all basement entries that are hidden from view. These should be secured with locking ground-level doors.
- Inspect all ladders, external stairways and fire escapes allowing access to roof should be secured.
- Test video surveillance equipment.

Internal Security

- Review internal security force at the worksite sites.
- Train/retrain security personnel on where shutoffs are for utilities, sprinkler systems and potable water to mitigate water losses in the event of an accidental leak.
- Test all burglar alarm systems.
- Review and update the current list of all individuals that have access to keys and change locks periodically.
- Be aware of individuals who may still be disgruntled and may cause damage to property through arson or vandalism.

Community Awareness and Cooperation/First Responders

- Be aware that vandalism can be a precursor of arson.
- Appoint a person to be a liaison with law and fire officials.
- Work with law enforcement officials to re-educate staff on recognizing unusual activities.
- Conduct a pre-fire planning session and review/update the emergency action plans in the event of a fire at the facility.
- Re-familiarize fire department personnel with sprinklers and alarms that are in service.
- Make sure the fire department has keys for easy access or knows where to meet on-site security staff.

Training

- Retrain all personnel in safe operation of equipment if shutdown has been extended.
 - Refresh all personnel that will conduct hot work operations in the safe performance of those duties.
 - Provide general safety training for all employees as if they were new hires.
 - Review the site's sprinkler impairment procedures that the company had in place to monitor any sprinkler closures and fire pump issues.
- Identify employees who will be responsible for assigned activities in the event of an emergency, i.e., – someone to call the fire department, someone to isolate utilities, someone to check that the fire systems are operating correctly, and someone to guide public response teams, etc.

Human Resources

As organizations plan for and address a successful return to full business operations, Human Capital considerations should be a top priority. It will be important to inspire confidence in the workforce that employees' health and safety remains the number one priority, and that organization's Human Resources policies and programs provide the necessary support. See also the Environmental, Health & Safety section of this Tool Kit for where Facilities Management and Human Resources work together on Health & Safety issues.

Topics and Policies to Review

- Protecting Employees and Customers
 - Occupational Health & Safety
 - Controlling Workplace Entry
- Protocols for employees who become ill
- Workforce Planning
- HR Policies
 - Leaves
 - Benefits
 - Retirement
 - Compensation
 - Communications

Protecting Employees and Customers

One of the most important factors to consider is how a company will protect its employees and customers.

Occupational Health and Safety Considerations:

- Outline clear and define key goals to ensure worker and workplace safety.
- Consider workspace changes:
 - Office space reconfiguration.
 - Other public spaces in the workplace—use of lunchrooms, restrooms, break rooms, gyms.
 - Meetings and use of meeting rooms.
 - Coordination with other companies in multi-tenant buildings and shared spaces (e.g., elevators, etc.).
 - Access control to work areas, halls, corridors, and community areas.
- Ensure all Occupational Health and Safety aspects are reviewed:
 - Workplace safety and health training programs.
 - Provision of personal protection equipment (PPE) based on exposure potential and training on how to properly use the equipment.
 - Documentation of PPE training and application.
 - Cleaning and sanitizing protocols (may differ by department).
 - Physical distancing protocols (may differ by department).
 - Fit-for-work screening or health questionnaires (See Aon companion document Employer Best Practices—COVID-19).
 - Illness reporting protocols and contact tracing.
 - Monitoring COVID-19 diagnosed cases of personnel (prepare update to include COVID-19 vaccination).
 - Community and personal sanitation/cleaning protocols for workplace/environment.
 - New workplace safety and health training programs.
 - Regular/standardized employee communications.
 - Safety concern “hotline”/portal/app.
 - Emergency response plan training and education (post-event and new hire).
 - Safety training and verification/documentation.
 - OSHA recordable considerations for proper record keeping:

- Is the reported illness work-related and OSHA recordable?
- Notification requirements to OSHA for hospitalizations and fatalities.
- Develop a system to evaluate when employees recovering from COVID-19, or completing their self-quarantine period from COVID-19, may return to work. For example:

| Symptoms/ Exposure Review | Response | Can the Employee Return? | What Steps Should Employee Take? | When Can the Employee Return? |
|---|--------------------------|--------------------------------|---|---|
| 1 Is there a fever/temp. greater than 100 degrees Fahrenheit? | If yes, see next columns | No | Yes, stay at home and consult with a doctor if symptoms worsen | If COVID-19 positive, follow guidelines in #6, if COVID-19 negative, return when symptoms resolve and are fever free for 72 hours |
| 2 In the past 72 hours has the individual had any of these symptoms? <ul style="list-style-type: none"> • Cough • Sore throat • Shortness of breath of difficulty breathing • Unexplained muscle aches • Loss of sense of smell and/or taste • Non-allergy nasal congestion | If yes, see next columns | No | Yes, stay at home and consult with a doctor if symptoms worsen | If COVID positive, follow guidelines in #6, if COVID negative, return when symptoms resolve and are fever free for 72 hours |
| 3 In the past 7 days has the individual had an of these symptoms? <ul style="list-style-type: none"> • Fever/temp greater than 100 degrees Fahrenheit? • Cough • Sore throat • Shortness of breath or difficulty breathing • Unexplained muscle aches • Loss of sense of smell and/or taste • Non-allergy nasal congestion | If yes, see next columns | No | Yes, stay at home and consult with a doctor if symptoms persist | If COVID positive, follow guidelines in #6, if COVID negative, return when symptoms resolve and are fever free for 72 hours |

| Symptoms/ Exposure Review | | Response | Can the Employee Return? | What Steps Should Employee Take? | When Can the Employee Return? |
|------------------------------|---|--------------------------|--|---|--|
| 4 | In the past 14 days has the individual had unprotected (i.e., no PPE) contact with someone diagnosed with COVID-19? | If yes, see next columns | Yes, if the individual does not have any symptoms listed in #3 | Continue self-monitoring | Return when employee confirms that s/he is symptom-free |
| 5 | Does the individual live with someone diagnosed with COVID-19? | If yes, see next columns | No | <ul style="list-style-type: none"> Stay at home and self-monitor for 14 days or longer after your housemate has recovered If symptom develops, wear a mask for 14 days after the onset of the symptoms or complete symptom resolutions, whichever is longer Limit travel outside of the home Consult with a doctor as need or if symptoms worsen | <p>Return 14 days or longer after your housemate confirms that s/he is symptom-free, provided that you have experienced no symptoms during this period</p> <p>If you experience symptoms during this period, follow guidelines in #6</p> |
| 6 | Has the individual been diagnosed with COVID-19 in the past 7 days? | If yes, see next columns | No | <ul style="list-style-type: none"> Stay at home and self-monitor for 14 days, or longer if the individual develops symptoms If symptoms develop, wear a mask for 14 days after the onset of the symptoms or complete symptom resolution, whichever is longer Limit travel outside of the home Consult with a doctor as needed or if symptoms worsen | Return 72 hours after employee confirms that s/he is symptom-free |

- Control Workplace Entry Considerations:
 - Entryway and elevator usage.
 - Implement staggered work schedules.
 - Develop protocols for admitting visitors/customers.
 - Establish/refresh and communicate formal screening program for COVID-19 that addresses employees, contractors, suppliers, and visitors.
 - Have pre-planned work staging and schedules limiting the number of employees based on square footage availability.
 - Coordinate with other companies if using common/work spaces.

Protocol for Employees Who Become Ill

Advise employees that if a person feels ill, or if someone observes that another person is sick or exhibiting symptoms of COVID-19 at work, they are to contact their manager or other designated person and isolate themselves to another area away from their co-workers. Telephone or e-mail communications are preferable to keep safe distance and barriers from one another. In adults, emergency warning signs* of COVID-19 can appear 2–14 days after exposure, and include, but are not limited to:

- Fever (100.4° F [37.8° C] or greater using an oral thermometer)
- Cough
- Difficulty breathing or shortness of breath
- Persistent pain or pressure in the chest
- New confusion or inability to arouse
- Bluish lips or face

**This list is not all-inclusive. Please consult a medical provider for any other symptoms that are severe or concerning.*

The following actions can support employee safety and protection:

- Speak with the individual by phone instead of face-to-face to maintain safe distance and barrier.
 - Follow emergency response communications plans.
- Ask if the employee has any COVID-19 symptoms or has been exposed to anyone with COVID-19.
 - Record time & exposure location (patient, community, co-worker).
- If the employee is symptomatic at work, instruct him/her to contact their medical practitioner and isolate them from the co-worker population to reduce the risk of transmission.

- Instruct the employee to leave work. If possible, public transportation should be avoided. If public transportation is unavoidable, instruct the employee to cover their mouths and cough or sneeze into a tissue or their sleeve while traveling. Remind employee not to touch nose, mouth or eyes and immediately wash hands when they arrive at their destination.
 - Should be part of emergency response plan-documented and consistently applied.
- Advise the employee to contact a medical professional. This may involve phoning the person's normal doctor or a specially designated center to seek advice.
 - Incident intake process, workers compensation third party administrator or carrier if at work.
 - Complete incident/illness investigation.
- Advise the employee on the self-quarantine period of 14 days.
- Have the employee's work station disinfected.
- Inform supervisor and Human Resources of employee absence and need for coverage.
- As able, a Human Resource representative should reach out to the ill employee by telephone or email on a regular basis regarding the employee's health status during his/her absence from work.

Workforce Planning

Evaluate the impact of the COVID-19 crisis on your workforce by navigating talent planning and workforce cost options.

- **Furloughs:** Determine which group of employees will be furloughed based on the impact of COVID-19 case incidences.
- **Compensation Planning:** Plan your talent cost impact based on compensation decisions such as salary reductions and merit.
- **Shift Planning:** Determine the impact of shift reductions on employee demand, and analyze cost-optimization models accordingly.
- **Attrition and Retirement:** Assess the impact of business-as-usual attrition, retirement and freezes on the talent costs.
- **Involuntary Measures:** Identify where layoffs can happen and if there is a business need to do so by considering factors such as employee performance, comp-ratio and tenure.

Determine the framework and plan for bringing employees back from furlough or working from home into the office safely. In addition, consider rethinking what the future of work may need to look like in order to be a more agile organization.

Put in place flexible and digitally ready solutions to find, deploy and retain talent

- Virtualize your assessment centers: Case studies, role plays, behavioral and capability assessments can all be carried out in a remote environment.
- Put in place a video assessment, interviewing and onboarding solution to ensure you can acquire new talent at the right time.
- Assess internal employees and redeploy to other business critical roles in a cautious hiring environment.

Considerations:

- Develop a phased framework to determine when roles and employees should return to the physical workplace:
 - Pivotal role for critical business operations.
 - Succession/back-up plan in place for all critical roles and key knowledge holders.
 - Data and analytics that can be used to understand which roles and employees to bring back (considerations include employees who are lower vs. higher risk for COVID-19, employees who already had COVID-19, employees who volunteer to return sooner, employees who may need to remain home longer to care for a family member).
 - Potential infection waves and how those will influence roles and timing of bringing employees back.
 - Consider alternative work arrangements including flex time, work from home, and alternating work days/schedules.
 - How to engage managers in determining the timing for and communicating with employees.
 - Coordinating the workforce plan with other companies if there is shared office space.
 - Coordinating with local authorities if there is reliance on public transportation for employees to get to work.
- Framework for the potential retraction or suspension of business restoration activities in the event of positive test results or confirmed cases in the workplace:
 - Protocol for employees who become ill.
 - Communication protocols for other employees in the workspace.
 - Criteria under which restoration activities may be scaled back or suspended (e.g., number of confirmed cases within location).

- Revisit working models to become a more agile organization:
 - Assess productivity of employees working remotely.
 - Identify which business processes can be supported remotely and for how long.
 - Identify managers best equipped to manage a remote or partially remote workforce for the future.
 - Determine which locations make sense to shift more workers to a remote/agile workplace.
 - Is there an opportunity to permanently redefine work from home?

HR Policies and Support for Return to Workplace

As the company builds a Return to Workplace (RTW) plan and re-starts operations, note that this should be a collaborative process between business leaders and human resource representatives. Human Resources will need to review current, interim and future policies to make sure they support both business and employee needs.

Considerations:

- Identify and review impacted existing policies and practices.
- Establish a new policy, practice and protocol, and safety version control for new laws and expected changes.
- Revisit and review return to work policies to ensure they meet new state laws and mandates.
 - How will the company deal with systemic delays in availability of provider notes for RTW?
- Determine how the company will respond to employees who are too afraid to come to work.
- Consider implementing or augmenting wellbeing programs; around emotional health support.
- Adjust leave and time off policies in response to those taken during the pandemic and other COVID-19 regulatory changes. Determine how the company will address various time off and leave scenarios:
 - Consider any implications related to, and ensure compliances with, emergency sick and family leave policies enacted by federal, state, or local government.
 - How will the company deal with employees who have used up all their vacation and sick leave?
 - How will the company deal with employees who have to stay home to care for ill family members or children (or adult dependents) whose schools or childcare facilities remain closed?

- Will the company allow employees to “borrow” against unearned time?
- What is the process for access to “donated” time bank (if one exists)?
- How will the company manage and prepare for employees who have not used PTO, vacation or sick time?
- How will the company deal with employees who have more leave than expected to use before the end of the year?
- Identify how the company will manage absences in the event there is a second wave of COVID-19 outbreak and sporadic periods of social distancing and remote work.
- Revisit “calling out sick” protocols to ensure the organization is complying with new Public Health, CDC and EEOC laws and guidance:
 - Develop a defined process for employees to follow when calling out sick.
 - Identify designated representatives to receive and register the call.
 - Provide designated representatives a questionnaire sheet to confirm if an employee is experiencing symptoms of COVID-19.
 - Review regulated Paid Sick Leave (PSL) geographies to ensure this document and administrative practices are in compliance.
 - Maintain the employee’s confidential information by developing a repository system. Ensure process consistency to avoid discrimination.
 - Provide the employee with next steps including; seeking care from a medical provider, follow-up protocols and expectations of the employee.
- Ensure furloughed employees go back to their correct levels for benefits coverage as furlough may not be a break in service.
- Ensure payroll deductions for furloughed employees are correct.
- Confirm FMLA and leave of absences are processed consistently for all occupational and non-occupational injuries and illnesses.
- Is FMLA being processed concurrently with Workers’ Compensation?
- Incorporate Diversity & Inclusion and other HR policies into decision-making.

Leave/Time Off Policies to Review:

- Sick Leave:
 - Denying a request for sick leave.
 - Version control to ensure existing and new practices and policies remain relevant and compliant to laws.
 - EPSL under FFCRA (if applicable).

- Family and Medical Leave Act:
 - Requirement for medical certification and any systemic delays
 - Substituting annual and/or sick leave for unpaid leave
 - Policies and practices to meet intermittent leaves
 - EFMLEA under FFCRA (if applicable)
- Donated Leave Transfer
 - PTO charitable donation programs
- Leave Without Pay
 - Intermittent leave
- Emergency Leave
- Caregiver Leave
- Public Health Leave and Policies

Benefits

Work with Human Resources personnel to review benefit policy/program impacts related to bringing employees back to work or into the office.

Considerations:

- Adjust benefits for workers returning from furloughs as needed.
- Consider implementing or augmenting wellbeing programs to address stress, anxiety, and other mental health repercussions of the pandemic.
- Be prepared to handle large volumes of questions regarding reinstatement of benefits following furlough.
- Be aware of possible changes to employment taxes.
- Review benefits coverage for virtual care (telemedicine as well as virtual visits with community providers) especially for primary care, mental health and COVID-19).
- Impact of delayed voluntary medical care (e.g., knee replacement, dental, etc.) from both financial and health perspectives.

- Workers' Compensation Insurance:

Whether Workers' Compensation insurance applies is highly dependent on the jurisdiction and the individual facts of the claim. In most states, the question of compensability will likely fall under each state's respective occupational diseases act or supplement to their workers' compensation statute. The employee will need to prove the virus was contracted at work and in many cases, that their work duties placed them at a greater risk to contracting the virus than the risk faced by the general public. Employees in the healthcare industry may face a less difficult path in proving compensability. Coordination of the investigation between the adjuster and Workers' Compensation carrier should focus on the following before any decision to accept or deny a COVID-19 claim:

- Determine if contracting COVID-19 is a risk inherent in the workplace (differs by state).
- Determine the actual probability the exposure occurred while in the course of or arising out of that employment.
- Determine if this is an actual impairment/disability as a result of the exposure.
- Determine if the disease was a "major cause" of any subsequent worsening or death caused by the infection for individuals with pre-existing personal conditions.

As of April 2020, many states have amended their WC rules to allow a presumption clause for "first responders", "essential" and or "front line workers" where contraction of COVID-19 could be considered "inherent" to the employment, and it is likely more states may enact similar amendments. While the definition of First Responder is broad and varies by state, some states are including healthcare workers, grocery workers and hotel employees in the definition. Note that many states have included effective dates with their amendments, so it is important not only to remain current on these actions but also be cognizant of effective dates and how those apply to the organization.

Other considerations as respects Workers' Compensation:

- Workers' Compensation is a primary benefit and when work-related injuries and illness are reported, a claim reporting trigger is initiated even if the employer questions the validity.
- If Workers' Compensation coverage is applicable the benefits would extend to the injured employee.
- Workers' Compensation benefits include potential applicable wage loss benefits, medical benefits and vocational rehabilitation benefits.
- Benefits vary by jurisdiction and state guidelines.
- COVID-19-emerging jurisdictional directives and the nature of business and potential exposures will impact Workers' Compensation compensability considerations.
- Family members of employees would not be covered entities under Workers' Compensation wage loss and medical benefits.
- Actionable and insightful Workers' Compensation claims coding (for reporting, tracking and analysis).

- Was there an increased risk or greater likelihood of contracting the condition due to the worker's occupation (such as a first responder or healthcare worker)?
- If not for their job, would the worker have been exposed to the virus or contracted the condition?
- Can the worker identify a specific source or event during the performance of his or her employment that resulted in exposure to COVID-19?

General codes may not suffice to give us the answers needed when the pandemic subsides. The Workers' Compensation Insurance Organizations (WCIO) voted to add new Cause and Nature coding for Workers' Compensation to capture COVID-19 claims effective 4/1/2020. They will be captured under the category of Occupational Disease and are defined as Cause of injury code: 83 – Pandemic and Nature of Injury code: 83 – Coronavirus 2019 (COVID-19) (2). However, these codes may not provide deeper contributory causes analysis to understand critical questions like:

- Was the nature of injury an exposure or contraction?
 - What was the source of the exposure?
 - What co-conditions does the claimant have related to COVID-19 at-risk health conditions?
- For additional information, please see your broker's Workers' Compensation claims consultant or legal resource.

Benefits Programs and Policies to Review:

- Health Insurance
- Disability
- Workers' Compensation Insurance
- Time Away programs including sick leave and leaves of absence
- Life Insurance
- Long Term Care Insurance
- Flexible Spending Accounts
- Employee Assistance Program
- Survivor Benefits
- Health and Wellness programs

Retirement Programs

Work with Human Resources personnel to review retirement impacts of business restoration.

Considerations:

- Review whether retirement program contributions that were reduced or suspended can be reinstated.
- Encourage employees who may have lowered retirement contributions to return to normal, or higher, levels of savings.
- Provide loan repayment guidance and support.
- Take advantage of scale in the marketplace to drive lower fees in DC plans.
- Review balance of health, retirement, and work-life benefits to ensure essential employees are supported.
- Review funded status of pension program and re-evaluate pension risk management strategy to consider re-risking investment portfolios or taking advantage of pension risk transfer options.
- Consider programs to support more flexible working arrangements for employees near retirement age—e.g., phased retirement, in-service distributions.
- Support employees' broader financial wellbeing by highlighting existing resources or offering new programs.
- See our Investments section in this document for more information on managing retirement portfolios and other asset pools.

Compensation

- Assess board of director composition and risks, including compensation changes and disclosures.
- Determine the impact of new legislation (e.g., CARES Act) on executive pay.
- Assess sales compensation plan and make adjustments to sales quotas.
- Reconsider salary increase schedules based on market practice and company financial outlook.
- Evaluate company equity strategy in a turbulent market; address underwater equity.
- Review and consider changes to your annual incentive plan, including bonus accruals and funding.

- Communicate often and with transparency on compensation-related actions.
- Adjust employee base salary costs based on company financial outlook.
- Work with Human Resources personnel to review compensation impacts related to bringing employees back to work or into the office.

Considerations:

- Ensure furloughed employees go back to their correct levels for benefits coverage as furlough may not be a break in service.
- Review job descriptions to determine if changes are required due to changes in roles, responsibilities or skills.
- Determine whether there should be any pay impacts (e.g., geographic differentials) if employees start to work from home permanently.
- Determine if any interim compensation adjustments (i.e., pay premiums, reductions, allowances, etc.) need to be modified or new ones put in place.
- Evaluate incentive/bonus plans to ensure aligned to goals for remainder of the plan year.
- Review incentive/bonus eligibility and administrative rules for furloughed employees to determine if any impact on payments.
- Determine if adjustments are required for incentive/bonus accruals/funding.
- Ensure payroll deductions accurately captured upon return of employee from furlough.
- Will the organization’s workers compensation insurance cover employees and their families if they become ill while in the line of duty?

Whether Workers’ Compensation insurance applies is highly dependent on the jurisdiction and the individual facts of the claim. In most states, the question of compensability will likely fall under each state’s respective occupational diseases act or supplement to their workers’ compensation statute. The employee will need to prove the virus was contracted at work and in many cases, that their work duties placed them at a greater risk to contracting the virus than the risk faced by the general public. Employees in the healthcare industry may face a less difficult path in proving compensability. Coordination of the investigation between the adjuster and Workers’ Compensation carrier should focus on the following before any decision to accept or deny a COVID-19 claim:

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- Determine if this is an actual impairment/disability as a result of the exposure.
- Determine if the disease was a “major cause” of any subsequent worsening or death caused by the infection for individuals with pre-existing personal conditions.

As of April 2020, many states have amended their WC rules to allow a presumption clause for “first responders”, “essential” and or “front line workers” where contraction of COVID-19 could be considered “inherent” to the employment, and it is likely more states may enact similar amendments. While the definition of First Responder is broad and varies by state, some states are including healthcare workers, grocery workers and hotel employees in the definition. Note that many states have included effective dates with their amendments, so it is important not only to remain current on these actions but also be cognizant of effective dates and how those apply to the organization.

Other considerations as respects Workers’ Compensation:

- Workers’ Compensation benefits apply to covered employees for work-related injuries or illness.
- Key Workers’ Compensation considerations are whether the reported injury or illness was arising out of or in the course and scope of employment.
- Reporting forensics and coordination will be required to support proper claim reporting.
- Family members of employees would not be covered entities under Workers’ Compensation benefits.

Employee Communication

Work with Human Resources personnel to review benefit policy/program impacts related to bringing employees back to work or into the office.

Considerations:

- Be aware of the up-to-date state and local “stay at home” regulations and COVID-19 infection experience in each location in which the organization has operations. It’s likely return to work communication plans and messages will need to vary by state and even specific locations.
- Establish and manage a consistent, well-coordinated communication strategy, ensuring alignment between key stakeholders, including company leadership, local management, real estate, and corporate communication—both organization-wide, and within each different location.
- Execute a communication cascade, specifically ensuring people managers are aware if their team(s) are being asked to return to the office/facility, including for managers with employees at multiple sites.
- Clearly define the intended audience for any communication to limit any confusion as different locations return to the office/facility at different times.

- Frequently and clearly communicate any new safety protocols being implemented, including:
 - If masks, social distancing, and other new measures will be required or encouraged.
 - Any new cleaning requirements, sanitation stations, etc.
 - Staggered start times for employees so not everyone is entering/exiting the building at the same time.
 - Potential temperature checks or other procedures to limit exposure to sick individuals.
 - Portion of the facilities that may have adjusted procedures or be closed (for example, break rooms, cafeterias, etc.).
- Establish who is in charge of return to work communications—is it corporate communications, real estate, or local management?
- Directly address any impact to benefits and compensation—changes, continuation, restoration—especially for employees returning from furlough or reduced hours situations.
- Provide employees with easy access to, and reminders of, any wellbeing resources the organization provides and any unique assistance that has been set up.
- Designate who will address/handle employee questions. If they exist, leverage central COVID-19 related intranet pages or email boxes.
- Employees may have a high level of fear about returning to the office/facility. If possible, provide employees the flexibility to continue to work from home if they are not comfortable/ready to work on-site again yet. Keep in mind, some employees may need to coordinate child care or elder care for family members before returning. If an employee is in a role that cannot be performed virtually, be ready with a plan to address the concerns of individual employees who do not feel safe returning to work.
- Continue to capture the momentum the company has built and have leaders provide the high-level view of the current state and future of the organization, how the organization is protecting employees and customers, and sharing any good news.

Information Technology

Information Technology Business Resumption Planning (BRP)

Once a company has gone into a Business Continuity or Disaster Recovery effort, resuming business can require a complicated process that should be prioritized according to level of criticality to re-stabilize the company. Procedures should be implemented prioritizing: employees, customers, facilities, technology, assets, and records.

Consider assigning a numerical scale to “time-critical” priorities the business unit has identified to outline planning objectives. Identify and task key people according to their roles and responsibilities to assist in developing an operational plan. Understand that the risk profile has changed and will likely need reviewing and updating.

Heightened global health and economic uncertainty relating to the COVID-19 pandemic has dramatically shifted the cyber threat landscape and created dynamic and significant cyber risks. Organizational cyber risk profile changes include:

- A modified technology footprint and expanded remote attack surface.
- Degraded operational resources and process execution deviation.
- Disgruntled personnel either furloughed or laid-off.
- Heightened occurrence and effectiveness of external and internal malicious activity.
- Increased risk of non-compliance with privacy and security regulations (e.g. GDPR, HIPAA).

As a result, organizations should direct limited operational resources to prioritize initiatives with highest risk reduction potential, in consideration of an altered cyber threat landscape. Prudent executives and risk managers should redefine their security strategy to maintain an appropriate level of security necessary to ensure support of business operations, in pursuit of the organization’s mission.

Organizations should consider the following in the short term to manage risks:

- Backup CISO Advisory: Can the security organization continue to operate if the Chief Information Security Officer or their staff are absent for two or more weeks?
- Remote Operations Readiness Assessment: Many companies were forced to implement quick controls to secure modified remote access technology, but they may not be optimal. As business resumes, the IT team will need to identify control gaps for authentication, network segmentation, endpoint protection, “Bring Your Own Device” security, data security, monitoring, and user awareness/training.
- Third-Party Supply Chain Resiliency: Is the company adequately prepared to maintain security operations in the face of potential on-going supply chain disruption? We suggest that the company reassess the cyber supply chain resiliency and reduce risks by identifying control gaps related to third-party dependencies.

General Information Technology

The role of technology changes regularly in every business. Technology organizations should offer clear strategic direction and priorities for BRP that align with the organization's business continuity plans to ensure proper resumption of business activities. Information Technology organizations may wish to consider the following BRP efforts during the transition back to former functions or to the new normal:

- At a pre-defined “re-start” point, resume priority IT system functions that may have been previously frozen to changes. While most outages are caused by implementing changes to the system, it is also important to ensure that new changes do not disrupt resumption.
- Ensure that capabilities for VPN/network/proxy to support remaining remote users are still viable and maintain capacity.
- Review data protection and security changes that may have been loosened as part of prior planning efforts.
- Re-assess whether remote or contingently remote employees (those identified as staff that can work remotely) should have retain high-speed internet access.
- Determine what hardware, software, WAN access, and support has entered the environment as a result of contingency plans. Scan hardware, software, and devices for new threats and vulnerabilities that may have increased risk from remote users.

Alternative Work Arrangements

- Social distancing will likely remain important for limiting exposure to COVID-19 in the months to come. If flexible work schedules will remain in place to enable employees to select and alter their work schedules to better fit personal needs and help balance work, personal and family responsibilities within limits set by the business, this is a good time to assess what is working and what is not. Flexible work schedules are voluntary and should still be subject to managerial approval, but time should be taken to review whether the arrangement is sustainable for business results.
- Information Technology professionals should partner with human resources personnel to ensure newly developed policies to implement social distancing measures (e.g. telecommuting, flexible work schedules) are still viable. If the company has a formal business continuity program, many of the policies that currently exist may only need minor revisions to accommodate the level of business resumption the organization is implementing.

Policies to Re-Review / Assess:

- Telecommuting/Telework
- Software updates and system scans
- Alternative Work Schedules
- Alternative Work Assignments
- Mutual Aid Work Arrangements

Considerations:

- Assessment of IT infrastructure – restore anything that needs to be restored.
- When and which systems need to be returned to production?
- Have systems been patched, hardened and tested?
- Can services still be provided via phone, teleconference, internet, fax or mail to minimize the time people are in contact with each other, or has the flexibility impacted the organization adversely?
- Can the company re-adjust business hours to unstaggered customers/clients' interaction during the transition from off-peak hours?
- Can the company resume identified services as regular business operations transition back to prior state or will some services need to remain in flux?
- Will the policy maintain flexible work sites (e.g. telecommuting/telework) as an alternative to returning to a corporate facility?
- Will the policy continue to enable flexible work hours (e.g. staggered shifts, extended shifts, compressed shifts)?
- Will the company continue to make blanket or ad-hoc provisions for employees to continue working at home (without using personal leave) when they are no longer in quarantine?
- Will the company maintain provisions for employees to work at home (without using sick leave) while recovering from illness?
- Will former “non-essential workers” be re-called from other “essential” duties in other units?
- Will policies for “essential workers” still differ from those for “non-essential workers”?
- Will individuals who are more at risk (e.g. immuno-compromised) for severe illness or death from the flu maintain special assignments in limited contact areas that are different from workers who are not considered high risk groups?
- Maintain awareness and training on standard and virus droplet precautions and the use of personal protective equipment (PPE) should the need still continue or if concerns remain from employees.

Telework Considerations:

- Review any and all broadened policies to include information specific to COVID-19.
- Continue to integrate information specific to COVID-19 into telework agreements.
- Determine which employees are still eligible to telework.
- Review telework agreements to all eligible employees.
- Conduct new telework risk assessments based on remote work and use, storage, and transmission of sensitive data.
- Reassess the need to maintain an enhanced telecommunication infrastructure that may have been redesigned to provide maximum amount of multi-way communication during emergencies.
- Risk assess the telecommunication infrastructure to ensure that telework arrangements, changes, and securing sensitive information has not increased vulnerabilities and threats.
- Reassess the equipment, security clearances and network applications that was provided to teleworkers.
- Provide training for managers and employees on new policies and procedures that impact the transition towards full business resumption.
- Rebalance information technology support if a shift away from telework is less viable.
- Lessons learned:
 - What changes need to be made to IT for next time?
 - How should employees be trained differently?
 - What weakness were discovered?
 - Ask employees for feedback on the operability of telecommuting and capture needs for improvement.

Investments

Investment Considerations for COVID-19

Investments include retirement plan investments as well as endowments, foundations, insurance general accounts, etc. COVID-19 has had strong impacts on the investment markets, including declining equity returns, increasing volatility, decreasing Treasury yields, decreased liquidity, and increased transaction costs.

We continue to emphasize the following considerations for investment portfolios:

- **Rebalance:** Consider rebalancing public equity positions that have drifted outside of policy. First, follow the investment policy (assuming policy has been reviewed and updated in past few years). Rebalance if needed to stay in policy, move toward target allocations. Market volatility may make it difficult to move to the policy allocations; thus, a legging-in approach may be appropriate – moving back toward policy over a few consecutive weeks.
- **Reduce Treasury Exposure and Duration:** The large drop in government bond yields means that some profit taking is warranted. Consider being sellers of government debt to fund other opportunities. Investigate if the current ultra-low interest rate environment represents an opportunity to reduce the interest rate duration.
- **Manage Credit Exposures:** Credit spreads are historically wide, increasing the appeal of credit strategies. In addition, review guidelines for active investment-grade fixed income managers to reduce the need to become a forced seller of downgraded securities, as there is likely to be a wave of downgrades in the coming months, and it may work to the company's advantage to not be a forced seller of these bonds.
- **Assess Liquidity/Review Cash Management Approaches:** Review the amount of liquidity relative to the net cash outflows. Be cognizant of whether the economic environment will change the expected cash inflows, and how that could impact liquidity, particularly the relationship between public and private asset liquidity. Be mindful of all the different facets of a potential liquidity squeeze across the portfolio and enterprise.
- **Be Prepared for Opportunities:** If company has ample liquidity, expect to see interesting opportunities in public and private markets as well as other areas such as real estate. Owning idiosyncratic strategies that capitalize on dislocations or attractive pricing remain interesting. We are beginning to see some new strategies emerge.
- **Consider an Opportunity Allocation:** If organization has not done so already, now may be an ideal time to consider an Opportunity Allocation. An Opportunity Allocation is not an investment in and of itself. Instead, it is flexibility created in the investment policy statement that allows fiduciaries the ability to make investments that may not fit within a traditional asset allocation construct. The Opportunity Allocation is designed as a maximum allocation as opposed to a target. For example, an Opportunity Allocation may have a target allocation of 0% with a maximum of 10%.

Legal & Ethical Issues

COVID-19 can impact all aspects of the organization, therefore the organization should ensure that it is meeting all legal and ethical obligations for which it is accountable, given the changes and response activities that are necessary to protect the business. Following are some thoughts and considerations for integrating legal and ethical practices into the COVID-19 response planning.

Is there a legal framework in place for the company's response?

Role of Legal Counsel

Ensure that all business-driven activities taken in response to an infectious disease outbreak are reviewed by in-house or external counsel prior to implementation.

Employee Relations

Are there any labor contract restrictions if contract employees or retirees are rehired?

What will be the legal issues with employees if the organization requires fearful employees to come to work particularly if no remote working alternatives are available?

Regulatory Concerns

City, county, state and federal governments may have laws and regulations about when and how certain industries and roles within industries may return.

OSHA requires employers to ensure that employees are not exposed to conditions that will cause death or serious physical harm. If an infected employee spreads the virus to others at work, the employer could potentially face OSHA violations, workers' compensation claims and, in some jurisdictions, worker lawsuits, unless precautions reasonable precautions as determined by OSHA are taken to lessen the threat.

Privacy Issues

Observing health privacy under HIPPA and other data privacy laws could raise challenging issues with COVID-19. Without a clear understanding of what illnesses, or exposure to illnesses, an employee is obligated to disclose, employers could leave themselves wide open to privacy invasion and discrimination claims. The actions of public authorities will have a bearing on reporting requirements, and potential insulation for employers.

Planning Requirements

Developing or reassess policies that address the following issues:

- Education
- Corporate travel
- Operating procedures
- Hygiene / Health etiquette
- Sick time
- Remote working

Operations

Business operations consists of multiple disciplines that collaborate and align to organizational goals and objectives to achieve success. The following are some of the areas, but not limited to, that are recommended to consider effective return to and successful restoration of operations:

- Locations
- Processes
- Employees
- Business Systems
- Equipment

Locations

- Which locations can reopen per local government approval/mandate? Are there any continuing community restrictions at these locations (e.g., social distancing, curfews, school closures, etc.?)
- Consider the customer base/demand for the location site and prioritize reopening according to organizational performance and revenue goals. Does the organization anticipate the required foot traffic to justify reopening operations and engaging employees and resources at the location site?
- If the site is leased, is the landlord prepared to reopen the site and ensure a safe environment that allows business operations to be restored and employees to reenter safely? When will the landlord reopen and when can lease occupants return and begin reopening operations?
- If there are critical vendors in the company's locations, are they prepared to reopen and support reopening operations? If not, are there back-up vendors/suppliers (within the same location, or outside of the location) that can support the reopening operations and processes?

Processes

- Which business processes should be restored on-site and in what order of prioritization? Are there processes that are co-dependent on others and require being restored simultaneously?
- After working remotely, is there a need for the same processes, or a need to make changes to the current processes? Is there a need to reevaluate the business processing model for operations considering what was learned during remote work?
- Is there a need to reevaluate performance and process metrics considering what was learned during remote work?
- Are critical vendors/contractors available to support reopening operations?

Employees

- Are the employees with the required skill-sets available and willing to return to a reopened work site and operations? Schools and daycares may remain closed and can affect the number of employees available to return.
- Are supervisors available and willing to work on-site and manage employees for the reopening operations? The supervisors may not be the same as before remote work.
- Collaborate with Facilities Management and Environmental Health & Safety (EH&S) to discuss continued social distancing at the reopened work site and the number of employees who can return considering maintaining recommended social distances.
- Determine new/revised work schedules for those returning to the reopened work site, and those who will continue remote work.
- Review current workloads and consider how to redistribute across both on-site and remote workers to ensure continuity of operations and to meet organizational business goals and performance metrics, as needed.

Business Systems

- Who does the company need to test the systems on-site? Are they available, or willing to come to the work site to test systems and data integrity?
- Have all software and data retrieval systems been tested, or scheduled for testing, prior to reopening operations? Is the data integrity intact, or are there inaccuracies across all systems?
- Collaborate with IT/DR team, or vendors/suppliers, to restore any lost data or repair any malfunctions in the software found during testing.

- Are the prior changes to the network and data security to accommodate remote work still in place and do they need to be reevaluated and/or updated? Is there a need for new system and data requirements?

Equipment

- Has all critical equipment/hardware been tested, or scheduled for testing, prior to reopening operations? When was maintenance last performed?
- Is the vendor/supplier that normally maintains equipment reopened and in place to perform maintenance, testing, and repairs to equipment/hardware? If not, are there backup vendors/suppliers available?
- Collaborate with Facilities Management, or vendor/supplier, on cleaning/sanitizing and providing possible protective barriers for all equipment prior to employees' arrival and start of work.
- How will the budget change for critical equipment/hardware/software needs to successfully reopen operations?
- Collaborate with the Procurement team to secure necessary services for equipment maintenance and repairs.

Physical Security

Physical security is no longer a brick and mortar, locks and doors responsibility. Rather, it is an enterprise-managed practice that, especially in these times, should be fully integrated AND be fully coordinated with other stakeholders, such as risk management, human resources, IT, operations and legal. The following is intended for all applications, however, if the location is in a shared building or property (campus), we would encourage a sub-committee to immediately communicate with the landlords and neighboring businesses, sharing ideas and concerns, with open and consistent communications.

Even while an individual can become infected yet show no signs of the infection, i.e., asymptomatic, remember that they still may be contagious and be able to transmit the disease. In adults, emergency warning signs of COVID-19 can appear 2 – 14 days after exposure.

Even with the best PPE equipment and tools, we would encourage the security team to assist and develop ways to limit contact with the public, customers and vendors through changes in receiving practices, barriers or distance (e.g., remain at least a distance of 6 ft. apart). This is especially true for retail, restaurant, hospitality, and other industries where there is direct contact with customers as well as businesses that operate operations and call centers with employees working in close proximity to each other. Consider staggering shifts and personnel, avoiding shift over-lap for a time.

Security control

- Monitoring
- Alert and alarm procedure and protocols
- Escalating of alarm and alert levels
- Enhanced signage for the COVID-19 issues such as zero tolerance for failure to practice social distancing, proper sanitary personal hygiene, PPEs

Consider how the company will limit access to the facility or prevent unauthorized entry. Develop employee and vendor badges/ID that are brightly and clearly color-coded for those who will need access. Code the badges to certain areas of access to assist the security team and other employees to be able to discern who belongs where, if possible.

Modify receiving practices to eliminate or minimize contact with mailman, UPS, couriers, or delivery truck drivers. Develop a secure and healthy protocol for the sequestering and quarantine of mail and packages if they are not effectively able to be sanitized. Refer to CDC guidelines for this and consider the lifespan of the virus on packaging.

Deliveries

- Janitorial services
- Cleaning procedures
- Personal Protective Equipment (PPE)
- Disinfectants that are qualified to eliminate this particular virus

Visitor / Vendor Screening

Protocols should be established based on the location and the need to interact with visitors and vendors.

- When does the company restrict?
- How does the company restrict?
- What are the exceptions?
- Who can authorize the restrictions?
- Develop a very strict protocol for any visitor or vendor to be potentially escorted (of course maintaining social distancing).

Enhanced Security Concerns and Operations

- Provide immediate training for all security personnel that directs their behavior to be even more patient, empathetic and helpful as the stressors placed upon their own fellow employees or visitors will be heightened (sensitivity training).
- Recognize that shortages in critical supplies will necessitate security to protect critical assets.
- Social disruption may occur, increasing the likelihood of public panic and disorder.
- Security policies will need to consider alternative work sites.
- The available workforce of security guards may be reduced because of COVID-19.
- Some facilities may need to be vacated for periods of time; security for these sites may be necessary.
- Evaluate existing security systems, resources for COVID-19.
- Workers will need training in any new work practices or PPE use.
- Educate employees on the role of each essential facility in case of closure.
- Develop procedures for securing buildings, protecting stored supplies, and restricting access.
- Create lock-down procedures for buildings to be closed.
- Find an alternative safe, healthy and secure off-site/work site to potentially be used for temporary relocation of critical operations teams or executives/staff.
- Provide a safe and secure location to store assets and supplies deemed essential to a sustained COVID-19 event and potential supply chain disruption.
- Partner with maintenance and operations to assist in maintaining proper PPE, sanitizers/wipes/Purell throughout facilities and washrooms.
- Limit or shut down communal sites such as break rooms and / or limit the occupancy.
- Security may be the front-line mechanism, along with Health and Human Resources to assist in monitoring or testing as employees and visitors enter the property (taking temperatures upon entry).
- Enforcing the signage issues such as social distancing with well-communicated rules and outcomes (e.g., warning, removal from property, suspension, etc.).

Purchasing & Supply Chain

Supply chains have been significantly disrupted during COVID-19 crisis. As we approach the recovery phase of the crisis, businesses need to evaluate the COVID-19 related implications of restarting the supply chains that are supporting the operational footprint as well as determine customer protocols for resuming the company's contribution to their supply chain.

Interface with Suppliers

- Has the supplier shared their documented plans for business unit continuity and/or information technology disaster recovery (IT DR)?
- In communication with Suppliers, do the company have a good understanding of:
 - Critical business processes and their recovery priority?
 - Continuity of their labor force and alignment with the company's revised production schedule. Impact of internal and external interdependencies to the organization?
 - Will Supplier be able to resume consistent production at each location or will it be phased?
 - Is the Supplier ready to resume IT interface with the organization?
- Has the organization established new precautionary procedures/safety protocols (e.g. quarantine requirements) related to receipt of product/materials from Suppliers?
- Have these requirements been communicated to Suppliers?
- How will the company manage compliance with these procedures?
- Temporary Government Restrictions on importing of goods relevant to the supply chain.
- Purchasing of Non-Production related goods and services.
- Development and communication of safety protocols for 3rd party service providers interfacing with the operations (e.g. delivery, cleaning, out-sourced functions).
- Understanding of temporary supply shortages of durable goods and delays of human-provided services and mapping to the operational start-up plan.

Interface with Customers

- Have customers shared their documented plans for business unit continuity and/or information technology disaster recovery (IT DR)? Have their plans changed since the beginning of the shut down?
- In communication with customers, does the company have a good understanding of:
 - Their critical business processes and recovery priorities?
 - Continuity of their labor force and alignment with the revised production schedule?

- Impact of internal and external interdependencies to the organization?
- Will the customer be able to resume consistent production at each location the company supports, or will it be phased?
- Is the customer ready to resume IT interface with the organization?
- Has the customer established new precautionary procedures/safety protocols (e.g. quarantine requirements) related to receipt of product/materials from Suppliers?
- Have these requirements been communicated within the organization?
- How will the organization manage compliance with these procedures?

Crisis and Recovery Communication

- Has the organization been in consistent contact with the Suppliers' and Customers' Crisis Management Team related to:
 - Revised production scheduling?
 - Labor force implications?
 - Safety protocols?
 - Country, State and or Local Government mandates that could impact supply chain resumption?

Risk Management

Risk Management should be a key player on a "Recovery Committee" – to understand changes in operations that may result in new/changes to risk exposures and insurance requirements.

Risk Management should focus on evaluating impacts on business operations and developing controls and solutions to reduce or eliminate risk to operations. Key considerations for Risk Management teams include:

- Potential Claims:
 - Assess existing insurance coverages and coordinate with insurance broker, and where relevant, legal advisers, on potential claims.
 - Participate in quantifying loss and communicating results to Management.
- Collaborate with insurers, health plan providers and local healthcare facilities to review and update mitigation options.
- Work with Operations and Environmental Health & Safety to develop and implement audit protocols and procedures.

- All plan elements -- disinfection, hygiene, worker safety, etc. – should be subject to regular audit and reports to Restoration Committee identifying non-compliance issues and recommended improvements.
- Review and understand applicable laws and directives involving the use of virtual doctors or rehabilitation services during the quarantine period and determine whether is more beneficial to resume care under prior protocols or maintain a virtual doctor/rehab protocol.
- Insurance:
 - Assess risk exposures related to COVID-19.
 - Specifically review any changes in policy wording (terms, conditions, warranties, exclusions, limits, sub-limits) implemented by insurers at renewal of existing coverages.
 - Review policies and exposure basis used to calculate premiums – can premium refunds/reductions be achieved?
 - Special focus on Workers' Compensation claims related to COVID-19 and any companion Employers Liability claims.
 - Monitor Employment Practices Liability for potential impact due to direct/indirect claims related to COVID-19 (California especially).
 - Monitor any Fiduciary claims from drop in 401K or elimination of company match for potential impact due to COVID-19.
 - Communicate with all Insurers and any Self-insured States the financial stability of the company to avoid any unnecessary assessments or collateral calls.
 - Make sure current claimants understand their options for returning to work on pre-established modified or transitional duty.
 - Discuss with insurers and brokers whether there is a possibility for COVID-19 to develop into large litigated actions against employers (e.g. Asbestosis).

Other Considerations:

- Work with Finance to develop strategies for Near-term Preservation of Capital –
 - Understand options for alternative financing for near-term premiums to conserve capital.
 - Look at potential Casualty collateral restructuring such as alternative Surety bond issuers, alternative collateral, captives.
- Be a part of the company communication to associates returning to work and any steps taken to flex with waves.
- Be part of management oversight to help set the ‘new normal’ operations standards and to observe and monitor implementation of policy/process changes, including steps to flex with waves.
- Collect and retain any media coverage of COVID-19 which includes the company by name.
- Respond consistently to all COVID-19 OSHA complaints following reopening.
- Monitor/Advise on risk changes related to Collective Bargaining, as applicable.
- Work with Procurement to ascertain any contracts which may have a liquidity clause that may trigger additional insurance coverage.

As regards insurance coverage questions, whether coverage applies, or a policy will respond to any risk or circumstance is subject to the specific terms and conditions of the insurance policies and contracts at issue and the relevant underwriter determinations.

Final Thoughts on Business Recovery and Resilience

Aon's team of risk, health, and retirement & investment professionals is available to partner with you as necessary during and after the transition from remote operations to business recovery.

This Tool Kit has been designed and prepared as a resource for clients and industry peers to provide insight on risk exposures and human capital (duty of care) concerns emanating from that recovery process. When combined with our Business Continuity Tool Kit which focused on preparation and response stages, and our Employer Best Practices-COVID-19 Screening document which recognizes that COVID-19 screening is a key part of any workforce and business resilience discussion, all three documents form a view that enables an organization to flex as needed and enhance ability to be resilient.

We encourage organizations to continue to seek guidance from health agencies, including the Centers for Disease Control (CDC) and the World Health Organization (WHO), as well as federal, state, and local government entities for a comprehensive and timely view of the current situation as it continues to evolve as well as information about the nature and characteristics of the virus itself.

If you have specific inquiries on your organization's unique COVID-19 experience, an Aon representative is available to answer your questions.

Below are some reference materials, websites, and education links to further assist you in your COVID-19 recovery and resilience planning:

Aon's Coronavirus Response Webpage:

www.aon.com/coronavirus

Centers for Disease Control and Prevention:

<https://www.cdc.gov/media/dpk/diseases-and-conditions/coronavirus/coronavirus-2020.html>

Guidance on Preparing Workplaces for COVID-19:

<https://www.osha.gov/Publications/OSHA3990.pdf>

World Health Organization:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/events-as-they-happen>

U.S. Department of Health and Human Services – Pandemic Influenza Plan 2017 Update:

<https://www.cdc.gov/flu/pandemic-resources/pdf/pan-flu-report-2017v2.pdf>

International Facility Management Association – Coronavirus Preparedness:

<https://www.ifma.org/news/what's-new-at-ifma/what's-new-at-ifma-details/2020/03/04/coronavirus-preparedness-resource-center>

Society for Human Resource Management (SHRM.org) – COVID-19 Preparation:

<https://www.shrm.org/resourcesandtools/pages/communicable-diseases.aspx>

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Aon plc (NYSE:AON) is a leading global professional services firm providing a broad range of risk, retirement and health solutions. Our 50,000 colleagues in 120 countries empower results for clients by using proprietary data and analytics to deliver insights that reduce volatility and improve performance.

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