

CDC Issues Guidance on Preparing to Reopen Workplaces, Businesses, Schools after COVID-19 Shutdown

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The Centers for Disease Control and Prevention (CDC) has [issued new Guidance](#) with detailed instructions on cleaning and disinfecting public spaces, workplaces, businesses, schools, and homes in preparation for reopening following COVID-19 shutdowns.

The Guidance includes a [Cleaning and Disinfection Decision Tool](#) that distills the advice into a flow chart with different recommendations depending on whether the area is indoors, outdoors, frequently used, and the type of surface involved.

The Guidance includes advice regularly seen in other CDC guidance. It recommends frequent handwashing or using hand sanitizer with 60% alcohol, avoiding touching the face, using EPA-approved disinfectants while cleaning (if possible), continuing social distancing and wearing face coverings.

The CDC also advises engaging strategies to minimize the number of people touching certain surfaces. For example, by purchasing door stops and leaving doors propped open, and removing objects from common areas that many people touch (such as common bowls of coffee creamer containers). Additionally, the agency advises that increased ventilation also helps minimize the spread of COVID-19.

In addition to these measures, the Guidance recommends developing a “cleaning and disinfecting plan.” The CDC distinguishes between normal routine cleaning (with soap and water) and disinfection (with an EPA-approved chemical or alternative solution). It notes that some items need both, other items need only be cleaned with soap and water. Further, some disinfectant should be left wet on the surface for a minimum amount of time to be most effective. Therefore, cleaning staff should check labels to ensure the product is used properly.

The Guidance provides the following recommendations for employers:

1. Employers must remember to keep custodial and janitorial staff safe, as they are at increased risk of exposure, both from COVID-19 and from any toxic effects of the cleaning chemicals used. Janitorial staff must wear the appropriate personal protective equipment (PPE) and receive guidance on safe use of the chemicals. As businesses are still encountering PPE shortages, employers should double-check the Material Safety Data MSD Sheets and PPE recommendations for cleaning chemicals when ordering, to ensure the purchasing department can make informed buying decisions based on what cleaners and what PPE is in stock.
2. Different surfaces require different cleaning regimens, and the plan should consider the frequency of contact and the various types of materials. The CDC also recommends considering removal of soft, porous surfaces (such as rugs and soft seating) to streamline and simplify cleaning and disinfectant processes.
3. Outdoor areas, generally, need only to be cleaned and do not need to be disinfected

(with some caveats, such as bars and restaurants with outdoor areas). The Guidance also notes that pools, hot tubs, and other water play areas that have been properly maintained (for example, chlorinated) should not be a source of infection.

4. For indoor areas, places that have been unoccupied for at least seven days require only routine cleaning, as COVID-19 has not been shown to survive on surfaces for longer than that period of time. However, a building that has been shut down for some time may require other considerations when reopening. For example, assuring the water system is safe after not having been operated for a time (the CDC provides [additional guidance](#) on that).
5. For indoor areas occupied by people, routine cleaning should be followed by disinfecting frequently touched items, such as tables, doorknobs, keyboards, touch screens, and the like. These items can be cleaned and disinfected at least once a day, and perhaps more for certain items used by multiple people in public (for example, shopping cart handles and payment touch pads should be cleaned between each use).
6. Soft and porous materials in high-traffic areas also will need frequent disinfection. These are much more difficult to manage, which is the reason the Guidance suggests removing them if possible. Soft and porous materials that are not frequently touched need only to be laundered or cleaned, using the highest temperature setting possible, and fully dried.
7. The cleaning and disinfection plan should be regularly updated as guidance changes.

Although the CDC does not recommend that the cleaning and disinfecting plan be written, it may be a good idea to develop a written plan and distribute it to employees and cleaning staff. Additionally, signage reminding employees to minimize touching surfaces and to wash hands frequently may assist in exposure reduction. Employers should document the steps they have taken to assure their cleaning and disinfection procedures are compliant with the latest guidance and recommendations, including reviewing guidelines, developing a plan, and implementation of the plan. Documentation may include cleaning schedules, cleaning staff assignments, evidence of the engagement and scope of work of third-party janitorial services, purchase orders and shipping receipts for cleaning supplies and related PPE, employee communications, and anything else to show employers' efforts to keep work areas clean and disinfected.

If you need assistance with your plan or with any other COVID-19 issues, please contact the dedicated [COVID-19 Task Force](#) or any Jackson Lewis attorney.

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