



RETURN TO NORMAL: GUIDANCE AND RESOURCES FOR COMMUNICATIONS PROVIDERS

The Communications Sector Coordinating Council (“CSCC”) created this document to provide guidance to online resources available to assist communications providers establish and implement a plan as they consider returning to the workplace following COVID-19 closures. The resources provided in this document include state and federal government recommendations, industry best practices, articles, and questionnaires that may be useful with efforts to create a safe work environment and mitigating the spread of COVID-19.

Version 4.0
May 2021

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Return to Normal Resources for Telecom Providers

I. Introduction

The Communications Sector Coordinating Council (“CSCC”)¹ created this document to help telecom providers establish and implement a plan as they consider returning to the workplace following COVID-19 closures. The resources provided in this document include state and federal government recommendations, articles, and questionnaires that may be useful with efforts to create a safe work environment and mitigating the spread of COVID-19.

In accordance with the [Center for Disease Control \(“CDC”\) Hierarchy of Controls](#), businesses should mitigate hazards by attempting to (1) physically remove the hazard; (2) replace the hazard; (3) isolate people from the hazard; (4) change the way people work; and (5) protect the worker with personal protective equipment. To carry out these recommendations, businesses should start by creating a plan using the resources provided in this document.

This version 4.0 updates the CSCC’s prior Return to Normal Resources by including resources to assist companies’ decisions with respect to COVID vaccination requirements for employees and travel considerations. Version 3 included a link to COVID risk levels by county (I.2.), CDC considerations for returning to work (I.3.), and CDC guidance for testing employees in certain workplaces for COVID-19 (III.1.). Version 3 also included a link to examples of retailers’ mask policies for employees and customers (VII.9.) as well as a section on the CDC’s recommended vaccine distribution method (XI.).

II. Steps to prepare to Return to Normal

1. Identify and designate a return-to-work coordination team

- Team would be responsible for creating, communicating, implementing and regularly reviewing return-to-work plans.
- Members of the team should likely include senior executives who set the priorities and budget for an entity, as well as representation from human resources, legal, security, communications, facilities, procurement, and information technology departments as well as any employee wellness or morale committees.
- Team members should be responsive to employee questions about return-to-work measures.
- Companies may also want to designate team members with specific duties, such as serving as the return-to-work “captain” for a department or office floor.

¹ CSCC members represent communications sector critical infrastructure owners/operators, their designated trade associations, and standard-setting bodies, manufacturers, suppliers, and vendors of communications equipment, software, and services.

2. Consider the current status of COVID in the state/community

- Many states publish regular updates on health statistics on COVID-specific government websites.
 - o [COVID Risk Levels by State and County \(Includes international\)](#)
 - o [State by State trends in new cases](#)
 - o [U.S. COVID Risk and Vaccine Tracker](#)

- For companies operating in multiple states, resources include:
 - o Centers for Disease Control and Prevention: [Workplace Decision Tool](#)
 - o Johns Hopkins University & Medicine: [COVID Resource Center](#)

- Consider what community health metrics you will factor into return decisionmaking. Some key metrics include:
 - o New case rate (adjust for population, use 7 or 14 day average)
 - o COVID test positivity rates
 - o Vaccination rate for community and/or employee population
 - o See Harvard Global Health Initiative: [Key Metrics for COVID Suppression](#)

3. Develop a Plan

- Review the latest CDC Guidance on “[COVID-19 Critical Infrastructure Sector Response Planning](#)”
- See SAMPLE Framework for Decision Making in Attachment A.
- This guide breaks down [business readiness](#), including retail and warehouse readiness, into six points.
- Government guidance – National, state, local
 - o Current state and local guidance for the company’s business locations. This varies state-to-state, as some guidance comes from Governor’s/Mayor’s offices and some from health departments.
 - o State guidance on teleworking – some states had mandatory telework where possible, while others “strongly encourage” or “encourage” telework.
 - o Note any business requirements such as social distancing and/or face covering requirements, daily temperature checks, mandatory health screenings, etc.
 - o Resources for locating government guidance for your business location include:
 - The National Governors Association: [State and Territory Action Tracker](#)
 - The Council of State Governments: [Executive Orders by State](#)
 - US Chamber of Commerce: [State by State Business Reopening Guidance](#)
 - Ogletree Deakins law firm: [COVID-19 State Orders/Requirements](#)

- Health & Safety – leverage [OSHA guidance](#) and CDC resources for [office buildings](#), [construction workers](#), and [utility workers](#) on social distancing & PPE requirements; health screenings (consultation with landlords may be required); contact tracing; and tracking COVID infection rates and community spread
 - o Physical distancing in workspace, meeting space, common areas, breakrooms, elevators
 - o Ventilation, air filters ([See OSHA guidance](#))
 - o Cleaning protocols
 - o Supply availability
 - o Food Service areas
- Ecosystem status – regularly consult [state and local authorities](#) for updates
 - o Schools
 - o Child care/Senior care
 - o Public transportation
 - o Other essential business support
- Business Readiness
 - o CDC offers [strategies and recommendations](#) to businesses on safely reopening
 - o Update policies as needed related to sick leave, travel, meetings, office events such as celebrations, etc.
 - o Plan for the workforce – prioritize who returns to the office first, how flexible schedules and A/B teams can enable social distancing, staff questionnaires on risk of exposure
 - o Ensure close coordination with landlords
 - o Reach out to union leadership if employees are represented
- Employee Readiness
 - o Ensure regular communication with employees and managers about risk mitigation steps the company is taking, plans for return with ample notice for employees to plan for daycare/elder care, etc.
 - o Anonymous surveys can provide employers with important and honest feedback on employee needs, expectations and morale.
 - o The CDC provides specific resources for corporate communications teams in their [“COVID-19 Communication Plan for Select Non-healthcare Critical Infrastructure Employers”](#)

III. Key Planning Questions and Considerations

1. **What is the return to work approach (e.g., phased approach, location approach, job function approach, volunteer centered)?**
 - [CDC Guidance on Reopening the Workplace](#)
 - Identify job functions that have had the greatest impact from not being in the office.

- Consider pros and cons of bringing back employees that are able to telework effectively including, among other things, impact on employee sentiment, employee productivity, population density in your facilities, and infection risks.
 - o Consider employee rights in a return-to-work phase-in including guidance provided by the [Equal Employment Opportunity Commission](#) regarding when and how much medical information an employer may obtain from any applicant or employee.
- Examples of scheduling options include:
 - o A/B Rotations: Divide employees into 2 or more teams and bring only one “team” into the office at a time. This allows multiple employees to return to the office while keeping low population density at any given time. Rotations of a week at a time allow for cleaning between teams.
 - o Flexible work hours: Reduce the number of employees arriving at one time thereby reducing density in common areas, elevators, stairways, etc. Employees also value flexibility to facilitate child or elder care.
 - o In multi-tenant environments, coordination with building management is essential.

2. What are the roll back procedures if there is another outbreak? How is roll-back communicated quickly and consistently to affected individuals and potentially not to all employees of a multi-location company?

- This could be driven by a deterioration in community spread or a localized outbreak among employees – be prepared to identify either case.

3. Can an employer require employees to receive a COVID-19 vaccine?

- This likely depends on whether the [employer can demonstrate](#) a business necessity. Some informative references are:
 - o [What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws | U.S. Equal Employment Opportunity Commission \(Section K\)](#)
 - o [Are accommodations possible for employees who do not receive a vaccine to allow continued employment?](#)
 - o [Is there any distinction between emergency use authorization and FDA approved vaccines?](#)

4. What steps can employers take to encourage staff to receive a COVID-19 vaccine?

- [COVID-19 Vaccination Hesitancy within the Workforce](#)
- [CDC Essential Workers COVID-19 Vaccination Toolkit](#)

5. What if a company does not require an employee to receive a COVID-19 vaccine and the employee infects another employee or the public?

- [Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace | Occupational Safety and Health Administration](#)

6. Additional Resources:

- US Chamber of Commerce
 - o [Digital Resources Center](#) provides businesses with information based on the state(s) in which they operate
- Centers for Disease Control and Prevention
 - o [CDC Considerations for Returning to Work](#)
- World Health Organization (WHO)
 - o [Measures to take in workplace](#)
- Occupational Safety and Health Administration (OSHA)
 - o [OSHA Guidance on Protecting Workers](#)
- Federal Emergency Management Agency (FEMA)
 - o [Private Sector Liaisons](#)

IV. Employee Testing

1. What testing is recommended for reentry into the workplace?

- The [EEOC has offered guidance](#) to accompany CDC recommendations
- Employers may consider testing workers as part of a [comprehensive approach to reducing transmission](#) of the SARS-CoV-2 virus especially in the following high-risk settings that have demonstrated potential for rapid and widespread dissemination:
 - o [Workplaces where physical distancing is difficult](#) and workers are in [close contact](#) (within 6 feet for 15 minutes or more) with co-workers or the public
 - o Workplaces in remote settings where medical evaluation or treatment may be delayed
 - o Workplaces where employees live in congregate settings (e.g., fishing vessels, offshore oil platforms, farmworker housing or wildland firefighter camps)
 - o Workplaces where continuity of operations is a high priority (e.g., [critical infrastructure sectors](#))

2. What type of testing? (e.g., temperature, antibody/antigen or Active COVID test)

- Standardized Employee Screening Questionnaire
 - o This [Questionnaire](#) is used to guide employees in deciding whether to return. The questionnaire directs responders that answer “yes” to any question to contact their HR department about reasonable accommodations or alternative work options.
- Employee Temperature Best Practices

- Follow [recommended best practices](#) when implementing a program for taking employees' temperatures.
- Types of Testing available for COVID-19
 - [Descriptions of the tests available for COVID-19 testing.](#)
 - [CDC recommendations regarding testing for COVID-19.](#)
 - [Serological tests](#) detect the body's immune response to the infection caused by the virus rather than detecting the virus itself.
 - [Viral tests](#), which check samples from individuals' respiratory system (such as swabs of the inside of the nose) to determine whether the individual is currently infected with SARS-CoV-2, the virus that causes COVID-19.
 - [Antibody test](#), which checks individuals' blood by looking for antibodies, which can show whether the individual had a past infection with the virus that causes COVID-19.
 - "[Interim Guidelines for COVID-19 Antibody Testing in Clinical and Public Health Settings](#)" provides recommendations on the use of serologic tests to determine protective immunity and infectiousness among persons recently infected with SAR-CoV-2.

3. Where is testing available in the community?

- Community [testing sites](#) based on the state of the business' location.

4. How will testing results be handled? Who gets to see the results? Are there any privacy concerns?

- Data Privacy Considerations for Employers
 - [Tips for maintaining employees' privacy](#) when collecting or sharing information related to COVID-19
 - [Strategies for employers to use to protect employees' privacy](#)
 - [Information](#) regarding privacy related to COVID-19 testing and health monitoring

5. What if an employee refuses to be tested? Will there be any incentives for employees to get tested?

- [EEOC guidance](#) permits employers to require employees to get tested.
- Additional guidance accounting for religious accommodations
 - According to [Holland & Knight](#), "the EEOC's guidance does not specifically address situations where an employee refuses COVID-19 medical testing on religious grounds. Employers are not required to satisfy a religious accommodation request by an employee if such request would result in more than a de minimis burden. But COVID-19 represents a direct threat to workplace safety. Accordingly, it is likely that the direct threat posed by COVID-19 will allow an employer to disregard religious objections to testing posed by employees."
 - [Guidance for responding to an employee](#) who refuses to return to work.

6. If someone tests positive, who follows up? What is the follow-up protocol?

- Guidance on COVID-19 Test Results Suspected or Confirmed Cases of COVID-19 in the Workplace
 - o [According to the CDC](#), “Employers should not require sick employees to provide a COVID-19 test result or a healthcare provider’s note to validate their illness, qualify for sick leave, or to return to work. Healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner.”
 - o [According to the Harvard Business Review](#), the steps include expressing sympathy to the employee, contacting HR to see who the employee had contact with, let the other employees know that someone was diagnosed with COVID or is experiencing symptoms, while maintaining the employee’s anonymity.
The [CDC also recommends](#) if a sick employee comes to work, the facility should be shut down in the specific areas where the employee was for 24 hours and then disinfected.

7. Should returning employees complete a daily health assessment when returning to work? If so, how is this collected, how is privacy and security assured, and how long is the information retained?

- Standardized Employee Screening Questionnaire
 - o The US Chamber of Commerce created a [Standardized Employee Screening Questionnaire](#) to guide employees in deciding whether to return to work. The Questionnaire directs responders that answer “yes” to any questions to contact their HR department about reasonable accommodations or alternative work options.
 - o A law firm suggested [screening measures](#) an employer may want to adopt for employees returning to the workplace.

8. What are the failed test criteria for not being allowed to enter the workplace? Does the company manager or a medical professional assess the results? How does the company protect the employee’s health information?

- Guidance on COVID-19 Test Results Suspected or Confirmed Cases of COVID-19 in the Workplace
 - o [Information on the proper response](#) if an employee shows symptoms of COVID-19 or tests positive for COVID-19, including ensuring the employee who shows symptoms or tests positive remains anonymous.

9. What are the procedures if an employee becomes ill after arriving at work?

- [Steps](#) an employer should take if they find out one of their employees has COVID-19, including cleaning and disinfecting areas that the employee was in 24 hours after the employee was there, and informing employees of their possible exposure.

10. What happens if an employee exhibits symptoms of a respiratory condition, making others uncomfortable, but doesn't want to leave? What if an employee knows they have seasonal allergies?

- [Beaumont Health](#) provides a resource to help decipher whether symptoms are allergy-related, symptoms of COVID-19 or something else.

V. Guidelines for Workplace Social Distancing

The CDC established [Guidance for Businesses and Employers](#) that includes:

1. To what extent do open office layouts need to be modified to support safe return of more employees (e.g., new separators between work areas)?

- Implement flexible worksites (e.g., telework).
- Implement flexible work hours (e.g., rotate or stagger shifts to limit the number of employees in the workplace at the same time).
- Increase physical space between employees and customers (e.g., drive-through service, physical barriers such as partitions).
- Use signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.

2. Will common areas such as break rooms and cafeterias be closed off to enforce social distancing?

- Close or limit access to common areas where employees are likely to congregate and interact.

3. What are the limits to face to face meetings and other gatherings? Should they align to phases: Phase 1 <10; Phase 2 <50; Phase 3 etc.?

- Implement flexible meeting and travel options (e.g., postpone non-essential meetings or events in accordance with state and local regulations and guidance).
- When face-to-face meetings are held, participants should be spaced appropriately, potentially even separated by barriers if possible, and should wear masks.
- Prohibit handshaking.

4. Should signage be deployed to enforce social distancing? Are movement/circulation markings required on the floors?

- Signage and markers can be used to guide employees and visitors to observe appropriate social distancing practices in workspaces, lines, aisles, and other areas where people congregate.

5. If the public fails to follow a distancing policy, what are the consequences?

- Adjust your business practices to reduce close contact with customers — for example, by providing drive-through service, click-and-collect online shopping, shop-by-phone, curbside pickup, and delivery options, where feasible.
- Businesses have an obligation to protect their employees and customers and may be subject to specific state and local requirements with respect to social distancing enforcement.

VI. Guidelines for Contact Tracing

Upon learning that an employee has been diagnosed with COVID-19, the company should [act quickly to identify and notify](#) any co-workers who might have been exposed. The CDC prepared the following [guidelines for Contact Tracing](#):

1. What is the process for contact tracing?

- **Report:** An employee reports that he/she has symptoms of COVID-19, has tested positive for the virus, or has had contact with a person who has a confirmed COVID-19 case to the organization's human resources (HR) staff or to an appropriate person (e.g., his/her supervisor) who alerts the HR staff.
- **Mitigate:** The employee is sent home and asked to self-quarantine. All affected workplace areas and vehicles are cleaned and disinfected.
- **Investigate:** HR staff interviews the employee to identify his/her close contacts* in the workplace and to provide guidance on seeking medical attention. *([Close contact is defined by the CDC](#) as "someone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period (e.g., three 5-minute exposures for a total of 15 minutes).")
- **Inform:** HR staff informs the employee's close contacts of their exposure and provides guidance on mitigation steps.
- **Track and Follow-Up:** HR staff conducts follow-up interviews with the employee and his/her close workplace contacts to track symptoms and to indicate when/if he/she can return to the workplace.

2. How should the company's Human Resources department engage with potentially exposed contacts?

- **Conduct interviews** with the employee and his/her contacts by phone, excluding the employee's manager(s) because sensitive medical and personal information will be discussed.
- **Maintain confidentiality** by not identifying the individual who reported symptoms. Contacts only should be informed that they may have been exposed to an individual who has COVID-19 or who has been in close contact with someone who has COVID-19.
- **Provide clear guidance** on steps a contact should take and indicate when he/she can return to the workplace. The CDC recommends that contacts stay home and

maintain social distancing (at least 6 feet) until 14 days after their last exposure. The CDC also recommends that the contacts monitor themselves by checking their temperature twice daily and watching for a cough or shortness of breath. Contacts who are also employees may return to the workplace after verifying that they are still asymptomatic.

- **Consider whether to inform close contacts** who are not employees or work with local health authorities to provide that information for their contact tracing efforts.

3. What data needs to be collected on visitors to facilitate contact tracing? What are the privacy implications?

- The names of individuals entering the workplace, along with the date, time and name of worker(s) visited, should be collected either by the office building or by the company. This information should be used only if contact tracing is necessary.

4. Is the City or County's Public Health Department responsible for contact tracing? If not, who is?

- The employer can conduct contact tracing if they have the ability to do so within approximately 24 hours of a notice of infection and can maintain the confidentiality of all information collected. Public health personnel may be needed if these cannot be met.

VII. Quarantine Requirements and Enforcement

1. Who enforces quarantine?

- [The federal government derives its authority for isolation and quarantine from the Commerce Clause of the U.S. Constitution](#). States have police power functions to protect the health, safety, and welfare of persons within their borders. To control the spread of disease within their borders, states have laws to enforce the use of isolation and quarantine.

2. What are the consequences for breaking quarantine?

- Consequences vary. State and local statutes could provide for fines, criminal charges and even jail time for breaking quarantine.
- The [National Conference of State Legislatures](#) identifies relevant State statutes and summarizes the Statutes. It is not meant to replace legal counsel.

3. How are those that are required to be quarantined identified and tracked?

- Within the United States – monitoring for compliance is left to local and state jurisdictions.
- Internationally – some countries are geofencing and/or monitoring cell phone data to determine quarantine compliance (i.e. S. Korea, Taiwan).

4. Are employees that have travelled out of state or to a “hotspot” required to self-quarantine? What and who determines what travel requires self-quarantine?

- [Employers may ban any business-related travel to areas of high community spread.](#)
- Employers should also strongly encourage their employees to avoid all nonessential travel to areas where coronavirus outbreaks are high, as the CDC has recommended.
- Employers with business involving travel to those areas should consider reasonable alternatives for their workforce, such as videoconferencing.
- As more countries and U.S. locations report cases of COVID-19, employers should recognize that assessments of elevated travel risks must remain dynamic.
- Employers generally do not inquire into employees’ lawful off-duty travel.
 - o Employers should consider advising employees about the risks associated with travel and inform them of the consequences of undertaking such travel, including periods of quarantine (14 days is the current guidance) before being allowed to return to the workplace and apply any such practice on a non-discriminatory basis.
- Unionized employers should consider reviewing their applicable collective bargaining agreements to confirm their ability to unilaterally implement such a mandate or discuss the issue with the employees’ collective bargaining representative.

5. If an employee is required to quarantine, is the employee permitted to work from home or required to take leave?

- This will depend on the reason for quarantine, nature of the work, contractual considerations. Employers should consult the [Families First Coronavirus Response Act: Employee Paid Leave Rights](#) to ensure compliance.

VIII. Supply and Use of PPE (masks, thermometers, hand sanitizer)

1. Who is responsible for teaching employees the proper use of PPE?

- The [CDC offers guidance](#) regarding PPE.

2. How, when, and how often should PPE, including masks, be distributed to employees?

- Follow [OSHA guidance](#) on implementing a PPE program.

3. What happens if there is a PPE supply issue at a particular location? Is the location automatically closed until it is remedied?

- Employers will need to [evaluate the health and safety of their employees](#) based on the type of business offered.
- [FEMA offers guidance](#) for the preservation of PPE in non-healthcare settings.

- 4. Are employees required to wear masks? If so, are they to be worn all the time or only during movement? What is the policy, who enforces the policy and what are consequences for noncompliance?**
 - [OSHA generally recommends](#) that employers encourage employees to wear face coverings.
 - [CDC Request that Americans Wear Masks](#)
 - [Mask Requirements Across America](#)
- 5. Are different types of masks required for different jobs? Are homemade masks or bandanas adequate in some cases?**
 - The [general consensus in the medical community](#) is that cotton face masks are the best choice for stopping the spread of COVID-19.
- 6. What is the process for disposing of used masks?**
 - There are a [number of good ways to dispose of PPE](#), the best method depends on the type of PPE.
- 7. Will masks be required to be worn by office visitors, retail store customers, business sales contacts, vendor contacts? Who will provide masks for those that don't have them?**
 - The National Governors' Association has compiled [guidance](#) based on the type of industry.
 - Map of [Mask/Face Covering Guidance by State](#)
- 8. What are the expectations for customers when employees are on their premises?**
 - Employees can follow [these tips](#) when their job requires them to enter people's homes.
- 9. If a member of the public refuses to wear a mask, what are the consequences?**
 - [Suggestions for encouraging customers to wear a face mask.](#)
 - [Suggestions for how to respond to retail customers who refuse to wear a mask.](#)

IX. Distancing and Cleaning in Common Eating and Break Areas

- 1. Breakroom and Common Area Distancing.**
 - The [American Industrial Hygiene Association recommends](#) businesses provide sufficient space for employees to have breaks or meals six feet apart from others and reconfigure breakroom seating so employees do not face each other.
 - Limit the number of employees in common areas (locker rooms, breakrooms, cafeterias, conference rooms, etc.) so that employees can maintain six-foot social distancing.

- Replace high-touch communal items, such as coffee pots, water coolers, and bulk snacks, with alternatives such as pre-packaged, single-serving items.
- [Stagger Arrivals/Departures and Breaks](#). When possible, stagger employees' start and stop times and avoid large gatherings of people entering or exiting buildings simultaneously. Stagger employee break times to ensure that employees can maintain six-foot social distancing.

2. What guidance is available on how to clean and disinfect high touch surfaces?

- The [EPA has issued guidance](#) on best practices for cleaning and disinfecting.
- The CDC has also prepared [Guidance for Cleaning and Disinfecting](#) to help businesses develop, follow, and maintain a plan to perform regular cleanings.
- Routinely clean all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, printer/copiers, drinking fountains, and doorknobs.
- Practice contactless deliveries to the greatest extent possible. Contactless deliveries allow you to leave a delivery at a doorstep and to move back to a distance greater than 6 feet away while verifying receipt of the delivery.

The EPA has provided a searchable list of [EPA-approved COVID-19 cleaning products](#).

X. Safeguarding Against Vulnerabilities in a Remote Work Environment

Nearly all remote workers will connect over a consumer-grade Wi-Fi or ethernet router. Many teleworkers also use personal computing devices and phones. As the economy opens back up, remote workers may also want to connect via public Wi-Fi in cafes or hotels. This "Bring Your Own Device" (BYOD) environment lacks the regularly performed system updates and patches that are characteristic of most corporate IT environments. Even well-patched home systems lack enterprise-level firewalls and other cyber threat detection and mitigation systems.

[Bad actors have been observed using the new environment](#) to send phishing emails; set up fake websites; and even make social engineering phone calls masquerading as company leaders, IT and HR personnel, or COVID-related charities. Unfortunately, these threats are now often targeting a BYOD environment that is more vulnerable and less resilient. Given the many employees working from home as well as government assistance being made available to individuals and businesses, be sure to watch out for, and alert employees to, [COVID-19 scams](#).

The Cybersecurity and Infrastructure Security Agency ("CISA") has issued [Telework Guidance and Resources](#) as well as a [COVID-19 Disinformation Toolkit](#). The U.S. Chamber of Commerce also issued [recommendations](#) to guard against cyber threats. Consider adopting a few of the core practices below to mitigate cyber vulnerabilities.

1. How do you apply layered security controls?

- Leverage multi-factor authentication for all connections to the corporate network or cloud applications
- Implement data-at-rest encryption for devices that are outside of corporate control (e.g., desktop computers normally in company facilities)
- Consider available methods to track and remotely erase computers, phones, or tablets with corporate information that have been stolen or misplaced
- Longer term, the relative costs and risks of BYOD vs. corporate equipment should be carefully considered and corporate BYOD guidelines revisited accordingly.

2. What are ways to ensure regular communications and training?

- Conduct telework-specific training regarding cyber threats.
- Regularly communicate remote work risks and best practices to all employees.
- Highlight the importance of updating/patching home devices, including routers.
- Stress the importance of “cyber situational awareness” and encourage employees to refer suspicious cyber activity to IT teams for investigation.
- When communities and companies return to more normal conditions, provide training on connecting to corporate systems over publicly shared Wi-Fi (if it’s not prohibited by policy), as well as the dangers of physical theft, shoulder surfing, and eavesdropping when conducting business in a public space like a coffee shop or restaurant.

3. What should be considered regarding implications of teleconferencing platform use?

- Password protect access to open meetings.
- Use a “lobby” function to only allow identified/vetted people into a conference.
- Many conferencing platforms allow for recording and/or file-sharing, and if enabled, companies should provide policy and procedures for where and how to store such recordings (especially for conferences accessed from non-corporate devices).

4. How should providers balance operational needs with appropriate secure connection types?

- Tier functions to ensure the most secure connections are available for those who require them.
- When a corporate VPN connection is not necessary, encourage employees to access IT systems via portals and/or cloud applications.
- Consider making support functions such as corporate communications, HR, and IT helpdesk assistance accessible over non-VPN connections.
- Strain on VPN resources can be further reduced by diverting non-secure traffic outside of the VPN using a technique known as split tunneling.

5. What resources are available from CISA to address cyber vulnerabilities?

- CISA provides a number of resources that provide valuable information to assist communications providers in identifying and mitigating threats in the remote work environment:
 - o [CISA offers several no-cost scanning and testing services to help organizations reduce their exposure to threats by taking a proactive approach to mitigating attack vectors.](#)
 - o [CISA Insights](#) provide background information on a broad array of cyber threats and the vulnerabilities they exploit as well as a ready-made set of mitigation activities that can be implemented
 - o [Risk Management for Novel Coronavirus \(COVID-19\)](#) is for executives to help them think through physical, supply chain, and cybersecurity issues that may arise from the spread of Novel Coronavirus, or COVID-19
 - o [Enterprise VPN Security](#) describes considerations when deploying a VPN solution to securely connect employees to an organization's information technology environment
 - o [COVID-19 Exploited by Malicious Cyber Actors](#) provides information on exploitation by cybercriminal and advanced persistent threat (APT) groups of the current coronavirus disease 2019 (COVID-19) global pandemic with an emphasis on Phishing and Smishing (SMS Phishing)
 - o [Ransomware](#) is a type of malware threat actors use to infect computers and encrypt computer files until a ransom is paid
 - o [Defending Against COVID-19 Cyber Scams](#) warns individuals to remain vigilant for scams and provides guidance on precautions individuals can take to protect themselves from malicious cyber actors

6. Additional Resources:

- [DHS CISA & NSA: Telework Best Practices \(government employee focused\)](#)
- [National Institute of Standards and Technology: Security for Enterprise Telework, Remote Access, and Bring Your Own Device \(BYOD\) Solutions](#)
- [Cyber Attacks Against Retirement Plan Accounts](#)

XI. Travel and Permitting

1. When should employee business travel be allowed? Should there be additional tracking of employee travel?

- [CDC travel guidance](#)
- [Domestic travel considerations](#)
- Business travel information [based on WHO guidance](#)
- CDC [Frequently Asked Questions and Answers](#) regarding travel

2. Are there travel exceptions for critical infrastructure workers?

- [CISA guidance](#) on identifying essential critical infrastructure workers

3. Are there streamlined permitting/ROW applications, including the ability to submit applications electronically?

- [Issues for right of way professionals](#) to take into consideration
- [Considerations for continuing permitting and inspection activities](#) during COVID-19

4. How to ensure there is an adequate fuel supply and housing for workers if needed to travel to areas affected by hurricanes or other natural disasters?

- Tips for [planning for hurricane season](#) in light of COVID-19
- FEMA Hurricane Season Guidance

XII. Vaccines

Immunization with a safe and effective COVID-19 vaccine is a critical component of the United States' strategy to reduce COVID-19-related illnesses, hospitalizations, and deaths and to help restore societal functioning. The goal of the U.S. government is to have enough COVID-19 vaccines for all people in the United States who wish to be vaccinated. Early in the COVID-19 Vaccination Program, there may be a limited supply of the COVID-19 vaccine, and vaccination efforts may focus on those critical to the response, providing direct care, and maintaining societal function, as well as those at highest risk for developing severe illness from COVID-19. As vaccinated employees return to the workplace, companies should consider whether and when to relax other workplace COVID mitigation policies by consulting the latest CDC guidance, such as [When You've Been Fully Vaccinated: How to protect Yourself and Others](#) and [Interim Public Health Recommendations for Fully Vaccinated People](#).

1. What is the CDC's process for vaccine planning including development, testing and distribution?

- [8 Things to Know about U.S. COVID-19 Vaccination Plans](#)

2. Who does the CDC partner with and how does the CDC make vaccine recommendations?

- [How the CDC Is Making COVID-19 Vaccine Recommendations](#)

3. How does the CDC ensure vaccines are safe?

- [Ensuring the Safety of COVID-19 Vaccines in the United States](#)

4. Where can individuals sign up to receive a vaccine?

- [VaccineFinder](#) allows individuals to search for vaccine availability and to schedule an appointment to receive a vaccine.

5. What other information is available regarding vaccines?

- [Frequently Asked Questions about COVID-19 Vaccination](#)

- [Health Department Websites for all States and Territories](#)
- [COVID-19 Vaccine FAQs](#)

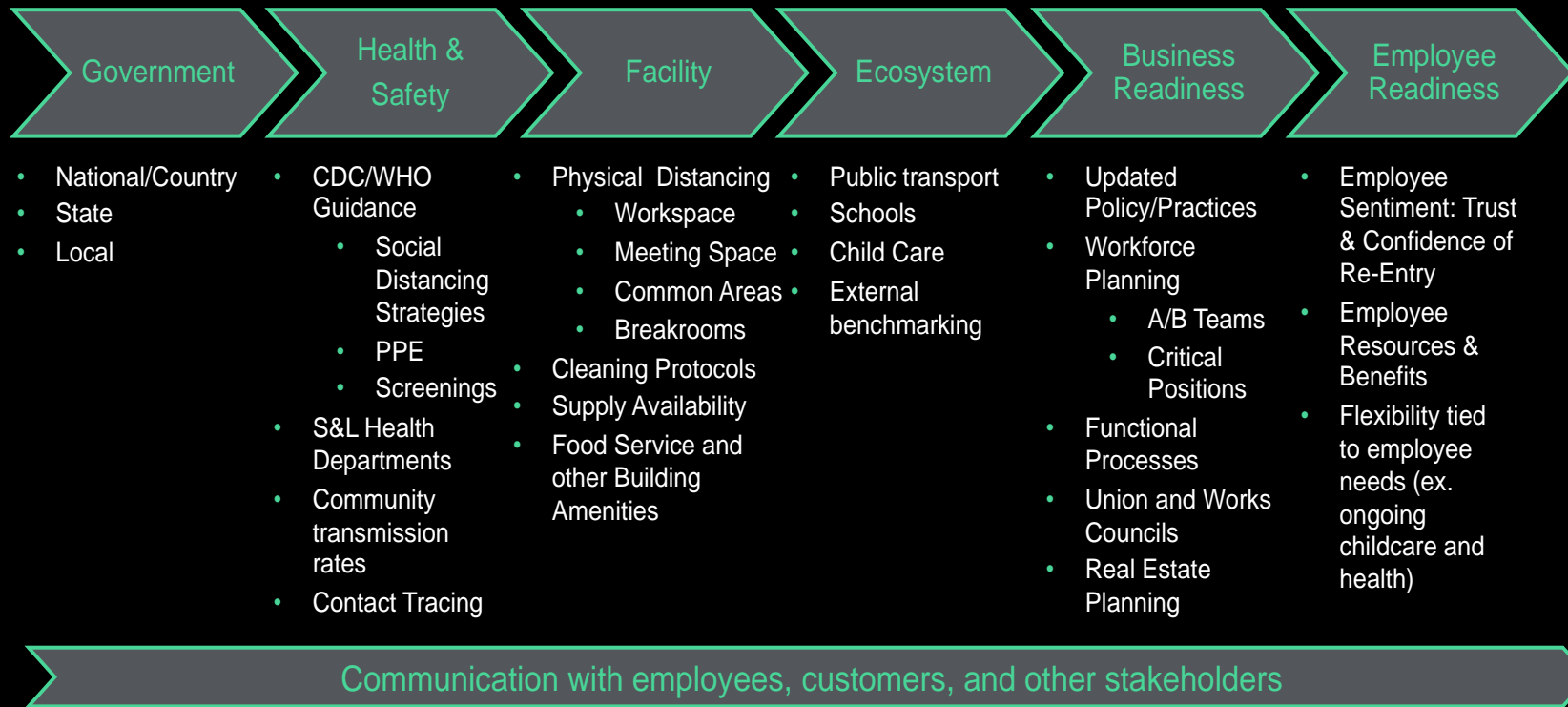
XIII. Company Liability Resources

- [PREP Act – Liability Protection for Providers of PPE Equipment](#)
 - [Additional Insight into PREP Act](#)
 - [Extending the PREP Act to Include Makers of Masks](#)
- [Challenges with Seeking a Liability Waiver to Protect Against Claims of COVID-19 by Customers and Employees](#)
 - [General Principles for Liability Waivers](#)
 - [Proposed Legislation to Protect Employers and Businesses](#)
- [Evaluating Insurance Policies](#)
- [Protecting Visitors to Companies’ Place of Business](#)
- [State Orders Protecting Companies that Create PPE](#)
- [Potential for Paycheck Protection Program \(“PPP”\) Loans to Lead to Liability Under False Claims Act](#)

Attachment A - SAMPLE Framework for Decision Making

SAMPLE Framework for Decision Making: 6 Workstreams

- Confirmation of critical decisions for each workstream must be "green" before re-entry recommended.



TLP GREEN: Recipients may share TLP:GREEN information with peers and partner organizations within their sector or community, but not via publicly accessible channels. Information in this category can be circulated widely within a particular community. TLP:GREEN information may not be released outside of the community.

