

COVID-19 CORONAVIRUS RISK BULLETIN FOR RESUMING OPERATIONS FOR HOSPITALITY FOLLOWING COVID-19

Is your facility preparing to resume operations or otherwise impacted by the Covid 19 Pandemic? Certain best practice steps are recommended before you return to any level of normal operations. This will require a team effort with the skill set and knowledge to work with the local/state regulating health authority, brand hotel flagship directives and understanding of the best practices laid out by several front line authorities such as the Center for Disease Control (CDC) and the World Health Organization (WHO).

Resuming business operations requires your organization to ensure the safety of employees and guests. You will need to reevaluate the layout of the operation to incorporate appropriate social distancing, consider how to reduce the risk of exposure from frequently "touched items", and determine what services to limit in order to properly control exposures. Preparing operational equipment such as HVAC, auto sprinkler system, boiler, pool/spa/Jacuzzi, water features, water fountains and alarm systems will need to be strategized as well.

As employees return, the following considerations are taken in to account:

- Ensure that flexible sick leave and supportive policies and practices are instituted.
- Ensure that the policies are consistent with public health guidance, employees have been properly trained and there is clear understanding of this guidance.
- Ensure consistency with Department of Labor and the Equal Employment Opportunity Commission's websites (<https://www.dol.gov/> ; <https://www.eeoc.gov/>).
- Provide appropriate employee assistance, possibly including an Employee Assistance Program, community support measures, etc. Be mindful that employees may need additional social, behavioral, and other services (e.g. coping with the death of a loved one).

Contingency plans should be developed in addressing confirmed Covid-19 guest or employee on site. Quarantine protocols, decommissioning of the room in question, regulatory agency notification requirements and tracking & notification process under OSHA "General Duty Clause" and CDC reporting practices should be in place.

It is strongly recommended that your business have a safety coordinator in place. This person will be responsible for COVID-19 issues and their impact at your workplace.

The following will address specific items relating to employee safety, facility safety, proper sanitization and hotel operations that should be taken into consideration.

EMPLOYEE SAFETY:

Screen returning workers for signs of illness

- Temperature checks recommended to be taken by employee prior to coming to work. If they have a temperature above 100.4 F, per CDC guidelines they must call in sick.
- Temperature checks should be done at work. These should be conducted by a person trained to properly use the thermometer. This person should use appropriate personal protective equipment (PPE).
- Use a CDC recommended questionnaire for staff to help address Covid-19 that addresses the following:
 - Fever or chills
 - Cough
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - New loss of taste or smell
 - Sore throat
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea
- Do not permit anyone to work with a fever or who exhibits signs of illness as per CDC guidelines.
- Employees treated for Covid-19 need doctor's approval to return to work.

Training/Retraining of employees

- Mandate a safety orientation that includes a review of any new procedures as a result of COVID 19 to all returning and new employees.
- Review social distancing & personal hygiene policies.
- Determine job duties & responsibilities adhering to Covid-19 protocols & best practices.
- Conduct job specific task and safety training.
- Review any new Safety Data Sheets with employees.
- Reinforce stringent handwashing practices requiring employees to wash their hands upon arriving at work and between tasks.
- Consider daily safety meetings as needed to ensure all safety programs are active and being followed.
- Provide a daily update on Covid-19 protocol changes.

Ample supply and access to personal protective equipment (PPE) & sanitation chemicals

- Provide appropriate PPE as needed (i.e. face masks, eye protection, face shields, protective gloves, etc.). Operations should not be resumed until these items can be obtained and distributed.
- Make hand sanitizer and/or sanitizing wipes available near entrances and other places through the property for immediate employee and guest use.

Breakroom/lunch rooms/ common kitchens

- Sanitize and disinfect tables (including vending machines) per CDC guidelines.
- Frequently sanitize coffee machines, microwaves and any other appliances maintained for general use.
- Maintain a sanitation log to ensure that areas are cleaned at acceptable intervals.

Install sneeze guard and other form of barrier to protect employees when social distancing cannot be incorporated.

PROPERTY SANITATION:

Ensure that the premises is properly sanitized and disinfected in accordance with current health and safety protocols established per Centers for Disease Control and Prevention (CDC) Guidelines. <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>.

Use only disinfecting products approved by the Environmental Protection Agency (EPA) and contained on this list: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.

Concentrate on sanitizing common touch points, door handles, front desk counters and equipment, elevator controls, stair handrails and other surfaces frequently contacted by employees or guests.

Items such as bell carts should be sanitized and cleaned after each use.

FACILITY SAFETY

Before any equipment, systems or operations are restarted, ensure all detection and protection systems are in proper operating condition.

Fire alarms, smoke and heat detectors, sprinkler systems, fire suppression systems, fire pumps, etc. should be tested to ensure they are functioning properly.

Inspect all equipment to ensure:

- Appropriate guarding and safety measures are in place (if applicable).
- Safety controls (limit switches, emergency shut downs, combustion controls, ventilation, etc.) are in proper operating condition.
- Validate proper operation of major building systems (electrical, HVAC, air compressors, boilers, plumbing).
- Ventilation hoods and ducts have been inspected and cleaned as necessary.

Parking areas:

- Inspect lighting, repair as needed.
- Evaluate overall safety of the structure, ensure walking and driving surfaces remain in good condition.
- Check for bees and other insect/animal infestations.
- Have elevators serviced/inspected.

Pool/sauna/Jacuzzi/water features/water fountains:

- Water quality may be compromised with microbials including Legionella bacteria. Take appropriate measures to ensure this is addressed. Additional information can be found in the Allianz Risk Bulletin "Legionella Emerging issue with Hospitality".
- Evaluate water quality to comply with health code requirements.
- Replace filters and incorporate "shock treatment".
- Water fountains and water features may need to be totally flushed and cleaned.
- Please refer to CDC Model Aquatic Health Code July 2018 for best practices in re-starting pool/water features/Jacuzzis.

THE FOLLOWING SECTIONS ARE APPLICABLE FOR SPECIFIC OPERATIONS:

Hospitality – Follow all common practices mentioned above plus:

Sanitize public/guest rooms in accordance with the CDC guidelines.

- Follow the CDC & WHO guidance for Sanitizing & Disinfecting. <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-ihe-response.html#content>
- Launder all linens, bed coverings and bath towels, etc. in hot water even if the room has not been used since it was last cleaned.
- Change/sanitize air conditioner filters and drain pan cleaned & sanitized (A/C & heat unit).
- Disinfect all surfaces and equipment in the room where a guest may touch such as telephones, television remotes, etc.

Sanitize equipment that may have been contaminated prior to or during change of occupancy.

- Sanitize and disinfect all common sitting areas.
- Fitness equipment must be sanitized, especially frequently touched points.
- Evaluate proper water quality for pools, spas and hot tubs, and fountains, treat water as appropriate to comply with local health department guidelines, see above for additional information.

Reduce potential exposure to guests in food service areas by considering the following:

- Use prepackaged items to the greatest extent possible especially in buffet areas. Consider elimination of buffet style food serving.
- Make grab-and-go bags available.
- Use disposable dishes and silverware.
- Install barriers where social distancing cannot be done between employee and guest.
- Reduce seating capacity as appropriate per local guidelines. 6 feet clearance where possible still generally recommended.
- Increase frequency in sanitizing surfaces or common touch points such as handles on coffee urns, microwaves, waste receptacles and other common use appliances and surfaces.

For hotel operations, include the following:

- Post signage at entrance & front desk on “stay at home” order by CDC if showing signs of flu-like symptoms or contact with confirmed Covid-19 person; social distancing practice; coughing etiquette and personal hygiene practices.
- Hotels should seek guidance from the hotel brand flagship and local governing health agency directives for handling guests that indicate they are experiencing flu-like symptoms or were recently exposed to a confirmed Covid-19 person.
- Enforce social distancing requirements. This can include floor markings, traffic flow patterns, signage, controlling occupancy levels and barriers. If the practice is violated, implement appropriate controls such as monitoring & controlling the number of guests and/or use barriers.
- Limit persons on an elevator to two occupants, except when members of the same family ride together.
- Limit the number of occupants in the room and occupancy as a whole to maintain social distancing requirements.
- With the ever changing practices for Cleaning & Disinfection, the CDC has suggested leaving room vacant for 24-72 hours before or after cleaning. Sanitation should be completed closer to when the new guest takes occupancy of the room.
- Provide sanitizing stations at entrance and throughout common areas such as business centers and fitness rooms.
- Reinforce handwashing and general sanitation policies with staff.

Crisis Management – Confirmed Covid-19 employee or guest on property

Brand flagship hotel, state/local health agency and best practices provided by CDC should all be consulted for implementing action steps.

Health authority required notification could vary from one jurisdiction to another. Action steps should be determined in advance as part of your plan.

OSHA requires direct reporting within 24 hours if person is hospitalized or within 30 days of death. Four phase traceability process should be conducted. Check with all of the regulatory agencies for appropriate best practices. These will likely include:

- Contacting all individuals that were within 6 feet, 15 minutes or more exposure time and within the last 48 hours.
- Those individuals will be contacted, and requested to self-quarantine for 14 days or if an employee they should work in isolation at the workplace practicing strict social distancing requirement (as long as no symptoms arise). Do not disclose the details of the person that was COVID-19 positive per privacy laws.
- Clean & disinfect all areas in question that the person came into contact using CDC guidelines.
- Send notification to the rest of the employees in the workplace (while protecting the privacy of the confirmed Covid-19 person) of the date of confirmation. Provide action steps taken to prevent any further spread of Covid-19 since the incident.

Valet Parking – Recommend discontinuing this service during the pandemic.

Risk Transfer

With any changes in operations or suppliers, ensure that proper risk transfer management practices are implemented.

Some of the key components of this contract include, but are not limited to:

- Favorable hold harmless/indemnification.
- Additional named insured status.
- Appropriate insurance coverages and limits.
- An effective administrative control program which includes legal review by your general counsel.

For additional information, please refer to the Allianz risk transfer bulletins. Bulletins may be found here: <https://www.agcs.allianz.com/content/dam/onemarketing/agcs/agcs/pdfs/risk-advisory/ARC-RiskTransfer.pdf>

HELPFUL LINKS:

WHO Operational considerations for COVID-19 management in the accommodation sector - <https://www.satsa.com/wp-content/uploads/WHO-2019-nCoV-Hotels-2020.1-eng.pdf>

WHO Coronavirus disease (COVID-19) technical guidance: Guidance for schools, workplaces & institutions - <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/guidance-for-schools-workplaces-institutions>

CDC The Model Aquatic Health Code (MAHC): An All-Inclusive Model Public Swimming Pool and Spa Code - <https://www.cdc.gov/mahc/editions/current.html>

Government of Canada - Risk-informed decision-making guidelines for workplaces and businesses during the COVID-19 pandemic - <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/risk-informed-decision-making-workplaces-businesses-covid-19-pandemic.html>

Canada's COVID-19 Economic Response Plan - <https://www.canada.ca/en/services/business/maintaingrowimprovebusiness/resources-for-canadian-businesses.html>

CDC - Cleaning and Disinfecting Your Facility - <https://www.cdc.gov/coronavirus/2019-nCoV/community/disinfecting-building-facility.html>.

EPA list of disinfectants for use against SARS-CoV-2 - <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.

OSHA Guidance for Preparing Workplaces for Covid-19 - <https://www.osha.gov/Publications/OSHA3990.pdf>

OSHA Recordkeeping for COVID 19 - <https://www.osha.gov/SLTC/covid-19/standards.html>

QUESTIONS OR COMMENTS?

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