



# Return to Office Protocol



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## Return to Office Guiding Principles

As and when local authorities revoke “Stay at Home” legislation and permit more office-based work, Cozen O’Connor offices will reopen in a phased approach:

### Early Return

In this phase, the firm will begin to allow a very limited number of people back into the workplace. Employees who will be allowed into the office include:

- Essential employees who have been reporting to the office during the “Lockdown” phase
- “Key” personnel including Chiefs, Managers, Secretarial Supervisors (and others identified by the firm)
- Employees with business critical needs
- Other employees are allowed on a limited basis to enter the space to briefly retrieve materials with prior approval

### Mixed Return

In this phase, the firm anticipates that the majority of employees will return on a staggered schedule. Employees may elect to continue working remotely for any reason.

### Most Return

In this phase, the firm anticipates all but those in “at-risk” groups or who have other issues will return. Modified schedules might continue. Employees who elect not to return will have an individual conversation with HR so that the firm can understand the employee’s specific circumstances and make appropriate arrangements.

### All Return

In this phase, the firm anticipates that all employees will return to the office unless the employee has a specific and approved alternate arrangement.

The Cozen O’Connor COVID-19 Response Team has and will continue to monitor state and local orders and guidelines on a daily basis. Given the unknown and changing factors and variables, the Firm is taking a flexible approach. Each office will be evaluated on an individual basis and return to office plans will be tailored to the circumstances of the office.

In the event there is a resurgence of positive cases, the Firm will adjust the Return phase as appropriate and may revert to remote working for a period of time, if necessary.

Cozen O’Connor will review the following metrics when making determinations about when to implement each phase:

- Local mandates
- Number of new cases
- The rate of decline in new cases
- The availability and access to testing
- The availability of public transportation (as applicable)
- Child care availability
- Building access and protocols

Social distancing and personal hygiene practices must be followed.

Any employee who is sick, or caring for someone who is sick, for any reason should remain home.

Any employee who has a temperature greater than 100.4 needs to report that to their Manager or Office Manager and remain home.

## Cozen O'Connor COVID-19 Response Team

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The Cozen O'Connor COVID-19 Response Team meets on a regular basis, but no less than twice per week.

**Michael Heller**, Chief Executive Officer  
**Vince McGuinness**, Managing Partner  
**David Ellman**, Chief Operating Officer  
**Erin Bushnell**, Chief Human Resources Officer  
**Brian Gillam**, Chief Financial and Technology Officer  
**Lisa Haas**, Chief Marketing Officer  
**Mindy Herczfeld**, Chief Legal Talent Officer  
**Ken Hildebrandt**, Chief Analytics Officer  
**Terry Kufen**, Senior Vice President, Technology  
**JoAnn Konopka**, Director of Regional Administration

## Facility Preparations Prior to Returning to the Office

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The COVID-19 Response Team will work with Office Managers and Office Managing Partners to prepare each office for return. Components of facility preparation include:

- Working with all Landlords to understand building protocols/policies/procedures for tenants' and tenant guests' return to the workplace including MEP/HVAC considerations.
- Acquiring PPE, including Hand Sanitizer, Masks, and Wipes to be shipped to the Philadelphia office for storage and distribution to all locations.
- Acquiring and placing directional signage to create one-way corridors (where feasible) and other CDC advised signage that serve as reminders to keep social distance, wash hands, stay home when sick, and the like.
- Preparing offices:
  - Continue daily cleaning and continued focus on high-touch areas.
  - Clean and sanitize kitchen/breakroom/pantry areas, including appliances. Empty, clean, and decommission ice makers.
  - Distribute hand sanitizer throughout office spaces.
  - Close conference and other communal rooms for the Early and Mixed phases.
- Ensuring ongoing enhanced cleaning protocols. Particular focus on high touch areas including:
  - Light/Power Switches
  - Doors and drawers in common/communal areas
  - Chairs and tables in common/communal areas
  - Collaboration tools in meeting rooms (conference phones/IT and AV equipment)
  - Shared Equipment

## Secretarial Support during Phased Return

### Early Return

- Attorneys should continue to utilize support as they have been while working remotely.

### Mixed Return

#### Regional Offices

- Office Managers (unless in an “at-risk” group) will report back to the office on a full-time basis and continue to be the on-site/remote work flow coordinator. If the Office Manager is “at-risk” they will continue to work remotely and coordinate the work remotely with the assistance of a designated on-site employee.
- Prior to the each office’s Mixed Return phase, the Office Managers will contact the staff to determine each individual’s situation regarding returning to the office. In offices where social distancing logistics are more challenging, this should be taken into consideration when determining who returns to the office.
- Attorneys should continue to direct work to their assigned secretary, whether in the office or working remotely. In the event, the assigned secretary is busy with another task or the request is of a nature that cannot be performed by a secretary who is working remotely, then the request should be elevated to the Office Manager for assignment to a secretary who is working in the office.
- Conversely, the same applies to secretaries who are working in the office. If they need assistance with an assignment, they are to contact the Office Manager and the Office Manager will seek assistance from someone who is working remotely.
- Attorneys who decide to work in the office should not rely on the secretaries in the office if they are not their assigned secretary.
- Attorneys may not require that their secretary come into the office and should work with the Office Manager if they have specific concerns. Additionally, they may not require their secretary to stay home.
- We will foster a team environment, meaning that the attorney’s work, when needed should go through a centralized procedure to get assigned to someone in the group who can handle the job quickly, accurately and efficiently. Secretaries will continue to communicate with the Office Manager about their availability and capacity to help attorneys other than those assigned to them. If there is no availability within the office, the Office Manager should contact DPC to schedule and direct all work to [dpc@cozen.com](mailto:dpc@cozen.com).

#### Philadelphia Office

- All Secretarial Supervisors (unless in an “at-risk” group) will report back to their respective floors on a full-time basis and continue to coordinate the flow of work from attorneys to secretaries whether in the office or working remotely. If the Secretarial Supervisor is “at-risk” they will continue to work remotely and coordinate the work remotely with the assistance of a designated on-site employee.
- Prior to the Mixed Return phase, supervisors should contact their reports to determine each individual’s situation regarding returning to the office either on a full time or staggered basis. Ideally, initially it should be the Supervisor and at least 3 secretaries on each floor.
- Attorneys should continue to contact their assigned secretary with work whether the secretary is in the office or working remotely. If a secretary is engaged with other assigned attorney’s work, the secretary at Supervisor’s request or the Supervisor should contact available team secretary to complete work for the attorney. This team secretary can be either in the office or working from home. It is a matter of availability.
- Attorneys who decide to work in the office should not rely on the secretaries in the office if they are not their assigned secretary.
- Attorneys may not require that their secretary come into the office and should work with the Secretarial Supervisor if they have specific concerns.
- Secretaries must continue to communicate with each other and especially the Supervisor about their availability and capacity to pick up for other attorneys in the group.
- We will foster the team environment meaning that the attorney’s work, when needed should go through a centralized procedure to get assigned to someone in the group who can handle the job quickly, accurately and efficiently. If it so happens that there is no availability in the group, the secretary or Supervisor should contact [dpc@cozen.com](mailto:dpc@cozen.com). The Supervisor should always have open lines of communication with DPC and other Supervisors so work can be flowed to other groups when necessary.

## Administrative Support During Phased Return

### Early Return

- Directors will designate key personnel in their group to return to the office based on work requirements.

### Mixed Return

- All Directors (unless in an “at-risk” group) will report back to the office on a full time basis.
- Prior to the mixed return phase, Directors should poll their employees to see who feels comfortable returning to the office, either on a full time or staggered basis.
- Directors should create an in-office schedule for employees which takes into consideration social distancing and commuting logistics.

## Technology Resources

- Shortly before your scheduled return to work, IT will reach out to you to help you transition to new configuration that will allow you to work from both home and from the office.
- Staff that have been given a loaner laptop will continue with that laptop for both home and in-office. IT will remove the desktop computers and install docking stations.
- Staff that have been using Citrix remote access with their personal equipment will continue to use the remote access solution working from home and will work from their assigned desktops when in the office.
- Any employees who have removed IT equipment from the office are responsible for its safe return and installation when resuming work in the office.

## General Social Distancing Practices

### Early Return

- Employees should continue to work remotely, but may come into the office on a limited basis to get files or perform other short tasks. The employee must contact the Office Manager [Rose O’Drain in Philadelphia] prior to going in so that the number of people in the space remains limited.
- Employees identified by the firm as “key” personnel will return to the office.
- All communal spaces (for example pantries, lounge areas, kitchens, etc.) will be closed except for necessary access (e.g. pantries or kitchens to access sinks for washing of hands).
- Employees will not have access to shared appliances (microwaves, coffee makers, refrigerators, vending machines, etc), except when medically necessary.
- Employees should avoid all in-person interaction with others.

### Mixed Return

- Beginning with the Mixed Return phase, employees will return to the office on a staggered basis.
- During this phase, unless space allows for all employees to return and maintain social distance, employees will be split into groups which will alternate the weeks and/or days that they are working in the office to maximize social distancing.
- Start and end times will be staggered to avoid morning and evening “rush.”
- Offices will be classified into groups based on factors including office size, type of office building, amount of vacant space, and use of mass transit. See Appendix B for office breakdown.
- Prioritization of teams returning will be based on work requirements.
- All communal spaces (for example pantries, lounge areas, kitchens, etc.) will be closed except for necessary access (e.g. pantries or kitchens to access sinks for washing of hands).
- Employees will not have access to shared appliances (microwaves, coffee makers, refrigerators, vending machines, etc) except when medically necessary.
- Employees should avoid in person interaction with others.

## Daily Testing

### Early and Mixed Return

- Each morning, employees who will be reporting to the office will be required to log onto a website and answer a series of screening questions, including reporting their temperature. The Firm has partnered with US Wellness to provide this service which is a HIPAA compliant entity.
- Employees will receive one of three statuses based on their responses. Employees who are not symptomatic will be allowed to come into the office. Employees who receive an Intermediate or High Risk result will not be allowed into the office until they are otherwise cleared to return.
- Under no circumstances will employees with a temperature greater than 100.4 be permitted in the office.
- The Firm will not receive nor maintain any medical information. The only information the Firm will have is the overall daily risk level for each individual.
- At this time, the Firm will not require COVID-19 diagnostic or antibody testing to return to the workplace. Currently, testing is still in short supply and not all tests have proven accuracy. The rate of false positives and false negatives is still too high to accurately rely on these results from a workplace safety perspective.

## Personal Hygiene and Protective Equipment

### Early and Mixed Return

- Employees will be required to wear masks. If an employee does not have a mask, or if the firm determines that their mask is not appropriate, they will be provided with one prior to coming into the office.
- Masks are to be worn while traveling to the office, if traveling by public transport or as part of a car-pool; upon entering the office; while working at your workspace/office, unless you will not be within 6 feet of any other person; while using any common areas during the course of the day (e.g. restrooms; hallways; meeting rooms; lunchrooms, except while eating and drinking; etc); and while leaving the office at the end of the day.
- Gloves will not be required nor provided by the Firm. If an employee chooses to wear gloves, they should follow CDC guidance for properly [removing gloves](#).

## Early, Mixed, and Most Return

- Employees should continue the personal hygiene habits of 6-foot social distancing, frequent handwashing, and use of Lysol/hand wipes during their workday.
- Employees should not greet anyone with a handshake or other form of physical contact.

## Shared Equipment

- When using shared equipment/printers, employees are required to wipe the point of hand contact both prior and after use. Firm-provided hand wipes will be available for that purpose.

## Office Specific Social Distancing Practices

- Each Office will have an Office Specific plan to address the individual facilities and staffing plans. The office specific plans will be created with input from the Office Manager, Office Managing Partner, and COVID-19 Response Team.

## Shared Workspaces

### Early and Mixed Return

- Work hours and days will be staggered to limit occupancy and maintain at least a 6 foot separation between work spaces. As a rule of thumb, to determine occupancy levels in shared work spaces, take the total square feet for the room and divide by 36. This provides maximum capacity. For example in a 20' x 30' room, the square feet is 600. 600 divided by 36 equals 16.67. Therefore the maximum capacity for the room is 16 people.
- Employees are prohibited from sharing workstations.
- Partitions will be provided between workstations where 6 feet of separation is not possible.

## Communal Spaces

- The number of people in a common area should be limited so that employees can easily maintain a distance of 6 feet.

### Early and Mixed Return

- Access to communal space will be limited to necessary use only (e.g. pantries to access sinks for washing of hands). Libraries, dining areas, and other non-essential communal gathering spaces will be closed.
- With the exception of nursing mothers, employees will not be able to use Wellness rooms.
- Employees will not have access to shared appliances (microwaves, coffee makers, refrigerators, vending machines, etc) with the exception of medically required access.
- Utensils will be provided in individually wrapped packages. Disposable products should be used in place of firm provided drinkware. If an individual uses their own dishes, utensils, or drinkware, they should take it home and clean at home after each workday.
- Employees are encouraged to bring their own lunch to limit people coming in and out of the building throughout the day. Where feasible, the firm will try to make arrangements for employees to have the option to purchase boxed lunches to be delivered to the office.
- Employees should eat at their workstations/in their offices.

### Most Return

- Employees must wash their hands both before and after touching any shared appliances (microwaves, coffee makers, refrigerators, vending machines, etc) and clean them with the provided hand wipes.

## Restrooms

### Early and Mixed Return

- Depending on the size of the restroom, occupancy should be limited so that social distancing remains possible. Restrooms within Cozen O'Connor space will have alternating stalls, sinks, and urinals taped off to ensure proper distancing. In offices where the restroom is outside of Cozen O'Connor space, the firm will work with building management to ensure proper social distancing.
- Prior to entering a restroom, employees are encouraged to inquire whether it is occupied, even in restrooms where stalls have been blocked to ensure the maximum number of occupants is not exceeded.
- In restrooms with hand dryers, the dryers will be turned off and an adequate supply of paper towels will be provided.

## Meetings and Meeting Rooms/ Conference Rooms

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### Early and Mixed Return

- Internal in-person meetings are prohibited. All meetings should take place via phone or video conferencing.
- External in-person meetings should be limited to critical business only and must be pre-approved. Participation should be limited to the fewest number of people.
- Conference rooms will be closed.

### Most Return

- Conference rooms must be approved and scheduled by office managers and event coordinators. The online conference room reservation system (Book-It) will not allow you to book your own meetings.
- In-person meetings should be limited to 10 people.
- External in-person meetings should be limited to critical business only.
- Meetings must be held in a conference room which is large enough to allow at least one seat between each participant.
- Capacity limits will be posted on the outside of each conference room/meeting room.
- If used, employees should wipe conference phones and other equipment before and after use with a disinfecting hand wipe.
- No external conferences will be held in Cozen O'Connor offices until the All Return phase.

## Visitors

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### External

#### Early Return

- Visitors (other than delivery personnel) are prohibited from coming into the office.

#### Mixed and Most Return

- Visitors should be limited to only those that are a business necessity. Office Managers must be contacted prior to a visitor coming to the office. In Philadelphia, regular visitor protocols must be followed.
- Visitors will be screened and must comply with all office policies.

### Internal

#### Early and Mixed Return

- Employees may only work out of their primary assigned location. No one is permitted to work in another office out of convenience or proximity to the location.
- Employees may only visit another Cozen O'Connor location if it is for a business critical necessity and it is pre-approved by the Department Chair and the Office Manager of the visiting location.

## Travel

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### Business Travel

#### Early and Mixed Return

- Business travel should be limited to essential travel only and should be approved by the Department Chair.
- International travel must be approved by both the Department Chair and Managing Partner.
- When booking travel, employees should consider their mode of transportation (air, rail, or car) and take into consideration the ability to social distance.

#### In All Phases

- Travel must be booked through Lawyers Travel so that there is a record of destinations.
- All local guidelines for both the traveler's home base and destination must be followed.
- In the event quarantine is required based on CDC or local guidelines, the traveler must comply and stay out of the office for 14 days following the date of return.

### Personal Travel

#### Early and Mixed Return

- Personal travel dates and destination must be reported to HR prior to departing so that there is a record of destinations.
- All local guidelines for both the traveler's home base and destination must be followed.
- In the event quarantine is required based on CDC or local guidelines, the traveler must comply and stay out of the office for 14 days following the date of return.

## Illnesses

- Any employee who is not feeling well should not come into the office. If they are able, they may work from home, however, they should consider taking a sick day.
- Employees with temperatures above 100.4 degrees will not be permitted into the workplace until they have been non-medicate assisted fever-free for at least 72 hours.
- If an employee has a concern about another employee's health condition, they should report their concern to the Office Manager, Office Managing Partner, or HR. The concerned employee may opt to work remotely if they do not feel comfortable working in the office.

### Exhibiting Symptoms while at work

- If an employee becomes ill during the work day, they should immediately email, IM, or call their supervisor or Office Manager and leave the building to go home or seek immediate medical attention based on the severity of the symptoms. The employee should endeavor to avoid using Public Transportation.
- If the employee is too ill to leave on their own, the supervisor or Office Manager will assist in coordinating transportation. The employee should wait in an isolated area.
- The employee should seek medical treatment and keep HR informed of the results.
- The supervisor or Office Manager will contact HR and Facilities. The employee's workspace and any other areas where the employee was during the day will be deep cleaned.
- HR will decide if any other steps should be taken based on the situation and will keep the Office Managing Partner and Office Manager informed.

### Potential Exposure

- Employees who live in the same household as someone who is ill should work remotely until the person has recovered.
- If an employee learns that they have been exposed to COVID-19, they will be required to go home and make arrangements for testing. They will be asked to identify all employees with whom they came into direct and prolonged contact since the initial exposure. Those employees will be informed of the potential exposure and told to stay home until we know the results of the test.
- The work area and common areas near the potentially infected employee will be deep cleaned.

### Positive Test Result

- Employees who have returned to the work place and then test positive for COVID-19 must disclose this to HR.
- The employee's identity will be kept confidential.
- The employee must not return to the workplace until they have been cleared by a physician and provide a doctor's note.
- The employee will be asked to identify all employees with whom they came into direct and prolonged contact within the past 14 days. Those employees will be informed that they have been potentially exposed and told to work remotely for a minimum of 14 days.
- The work area and common areas near the exposed employee will be deep cleaned.