

A woman with voluminous, dark, curly hair is looking down at a tablet computer she is holding. She is wearing a dark blazer over a black top and a thin gold necklace. The background is a blurred office environment with light coming from a window. A large white star graphic is overlaid on the right side of the image, and a dark blue triangle is in the bottom right corner.

COVID-19 Response Framework

A Practical Guide for Your
Workforce Priorities

Segal

Organizations are managing their response to COVID-19's profound disruption to everyday life, often without much of a safety net. While some organizations rely on their business continuity plans and emergency response and disaster recovery processes, all appreciate, at one level or another, that this pandemic has raised issues not even the best-laid plans could have foreseen.

To help employers prioritize the plethora of HR management and employee benefit issues the crisis has raised, Segal is providing you this *COVID-19 Response Framework* to serve as a practical guide for your workforce priorities.

Three stages, three stakeholders

The framework consists of three interconnected stages that represent the time frames of an organization's response to the pandemic: short- (**Now**), medium- (**Soon**) and long- (**Future**) term. This approach offers flexibility for you to define the timing best suited to your organization's situation. Indeed, if the virus returns before a vaccine is developed, organizations may need to revisit some stages.

Successful HR management understands that it must always balance and address the different needs and perspectives of its vital stakeholders. Therefore, each stage also defines what success looks like from three crucial perspectives: the **Enterprise** as a whole, its **People** collectively and the **Individual** employee.

Proof of success after each phase



Enterprise	The enterprise addresses the immediate needs of the business and its people.	Leadership clarifies various business scenarios, their key trade-offs and their internal and external risks.	The enterprise crafts and executes a reimagined business plan and/or operating model.
People	The workforce relies on its organization's leadership to get them through those immediate needs.	The workforce is productive and proud of the organization's response to the crisis.	The workforce understands and trusts its leadership's decision-making process and long-term outcomes.
Individual	Individual employees feel physically and emotionally safe.	Individuals have an appropriate level of transparency about their role during the crisis and their near-term job security.	Individuals understand how the macro effects of the crisis will affect their future at the organization and their career trajectories.

COVID-19 HR and employee benefit priorities

Each phase identifies the key COVID-19 HR and employee benefit priorities for employers to consider, which fall into the following broad categories:



Health and Well-Being

page 4



Business Continuity, Incident and Disaster Response

page 8



Legislation and Regulations

page 12



IT Security and Data Integrity

page 16



Workforce and HR Communications

page 5



Financial Security and Retirement Savings

page 9



Vendor Management

page 13



Infrastructure Management

page 17



Leadership Support

page 6



Payroll and Compensation

page 10



Compliance

page 14



Workforce Planning

page 18



Absence and Time Off

page 7



Remote Work

page 11



Insurance Brokerage and Risk Mitigation

page 15



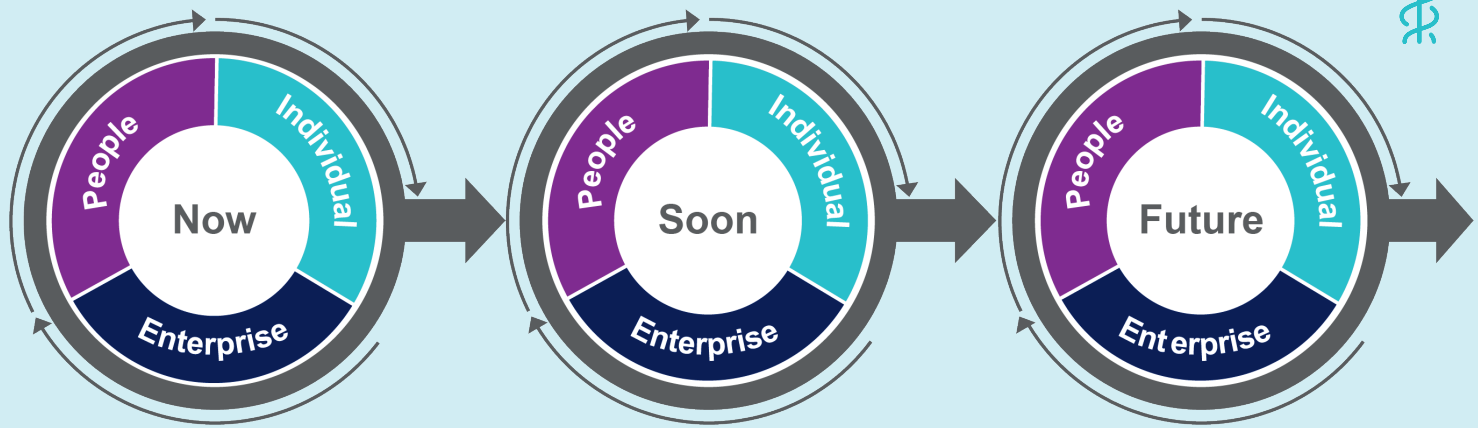
Career Strategies

page 19

Building on the framework

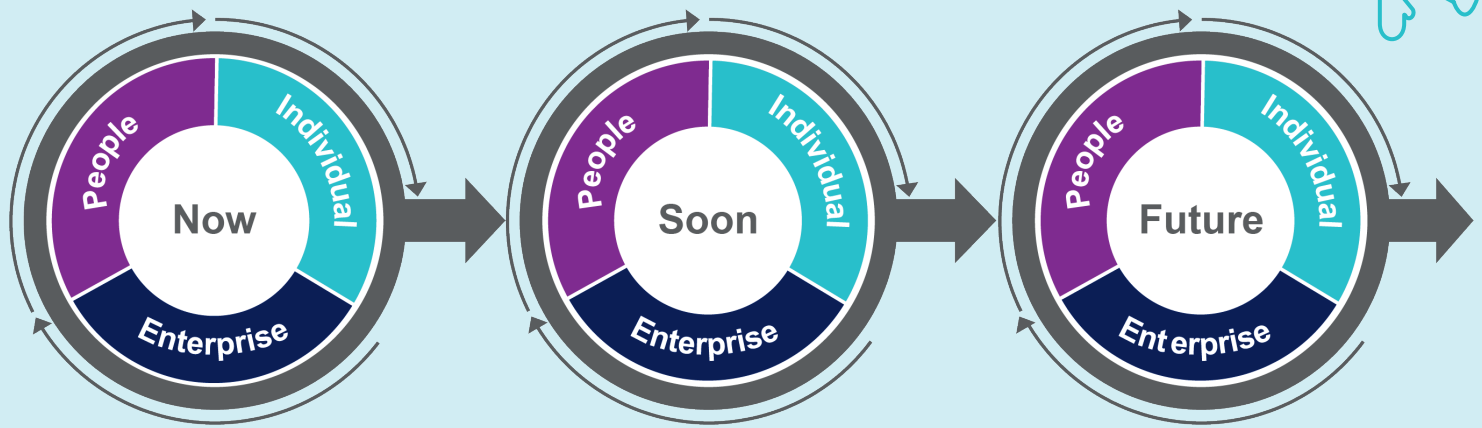
The following pages provide a detailed checklist of each HR and employee benefit topic above. They can be a helpful resource to confirm that the important issues related to the COVID-19 crisis are being addressed and in the right priority. They are crafted to supplement — not take the place of — ongoing best practices related to other HR management and employee benefit topics, such as performance management, reporting, disclosure, diversity and inclusion, total rewards, talent management, organizational effectiveness and collective bargaining agreements.

Health and well-being priorities



- Coordinate availability of COVID-19 diagnostic testing with carriers
- Work with carriers to determine COVID-19 treatment coverage levels
- Determine prescription plan policies for refills, quantity limits and clinical programs
- Ensure plans cover provider visits (including virtual visits/telemedicine ER and urgent care) in connection with COVID-19 diagnostic testing
- Distribute employee communications related to available healthcare options, including testing, treatment, telemedicine, and Rx — highlighting newly available coverage
- Consider telemedicine coverage for newly virtually enabled providers, in addition to standard telehealth options
- Send employee self-care communications on managing stress, dealing with isolation, and awareness of tele-behavioral health and employee assistance programs
- Create means for measuring and providing COVID-19 reporting required by regulatory agencies
- Communicate about health insurance coverage and premium payments, and/or COBRA for furloughed and laid-off employees
- Review flexible spending arrangements (health, dependent care) for change-in-status election issues
- Consider cost impact on group health plan of COVID-19 in 2020 and beyond
- Understand broader economic and health changes/challenges in your organization and how the benefits budget may be impacted under different scenarios
- Modify benefits design and strategy based on changes to the organization's workforce needs
- Review vendor contracts to address changes in coverage as well as material changes in enrollment
- Adapt well-being programs and communications to reflect COVID-19 environment (e.g., more work from home or helping essential workers, etc.)
- Plan for back-to-office procedures (e.g., on-site thermometers or virus testing, privacy, etc.) and communication about such procedures
- Assure that resources are available for employees with a disability or those with limited English proficiency
- Review Medicare supplemental programs and impact of COVID-19 changes on Medicare benefits
- Determine impact of closures on counting, for purposes of ACA employer shared-responsibility penalty reporting
- Ensure ongoing communications align with your benefits strategy
- Determine 2021 plans and contributions for all coverages, based on new workforce profile and budget expectations
- Review voluntary benefit policies such as critical illness, disability, AD&D and life
- Modify plan documents to reflect changes for COVID-19 coverage and other adjustments
- Consider which COVID-19 coverage changes will be temporary versus permanent
- Amend SPDs, notices, Employee Handbook, intranet site, website and other employee materials to reflect applicable changes
- Prepare for 2021 open enrollment and any other plan or program changes
- Utilize data mining to determine true costs of pandemic on workforce
- Encourage preventive and wellness visits that were postponed during the crisis to be made up
- Discuss with carriers how COVID-19 changes will affect Medicare Part D or Medicare Advantage programs
- Consider updating electronic delivery standards for plan communications
- Review dental/vision claims with carrier to determine contract value in light of COVID-19
- Continue year-round communication to help drive engagement with health and well-being programs

Workforce and HR communications priorities

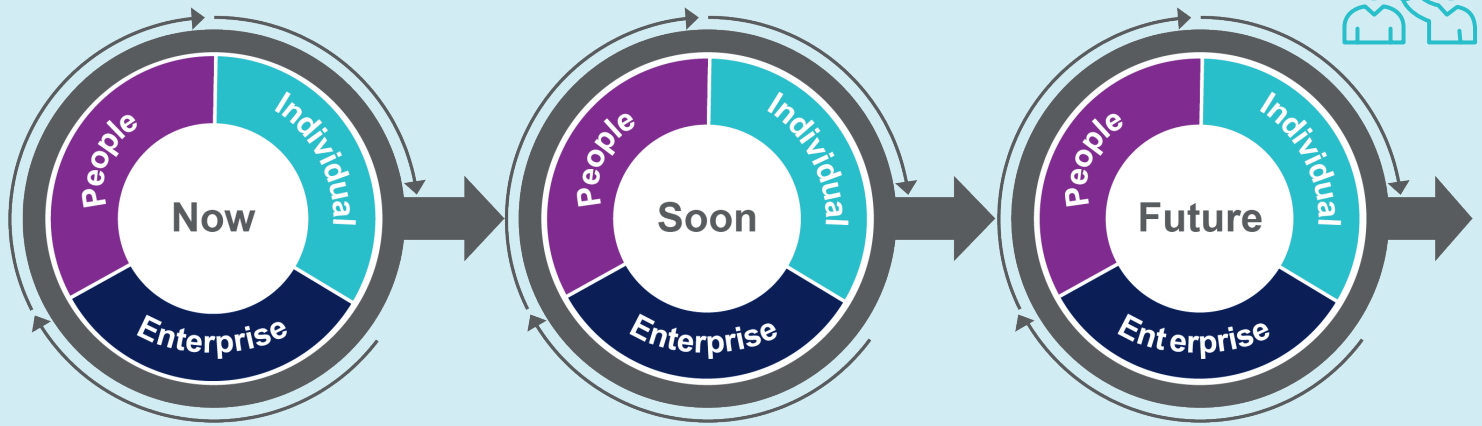


- Align and assess leadership communication needs for urgent priorities
- Offer guidance to managers regarding strategies to stay in touch with their teams
- Address productivity expectations and business continuation plan
- Promote healthcare, mental health, financial security and other employee support awareness
- Keep all stakeholders aware of ongoing developments
- Communicate CARES Act provisions adopted (or not adopted) with respect to retirement plans
- Communicate any changes or new benefits and programs that are of immediate value

- Align and assess communication needs for mid-term priorities
- Promote navigating current programs
- Promote health and well-being programs, including financial well-being
- Encourage employees and families not to delay healthcare or neglect their healthcare needs
- Continue to promote programs that provide immediate value
- Build processes to support increased year-round education for employees and managers in the future

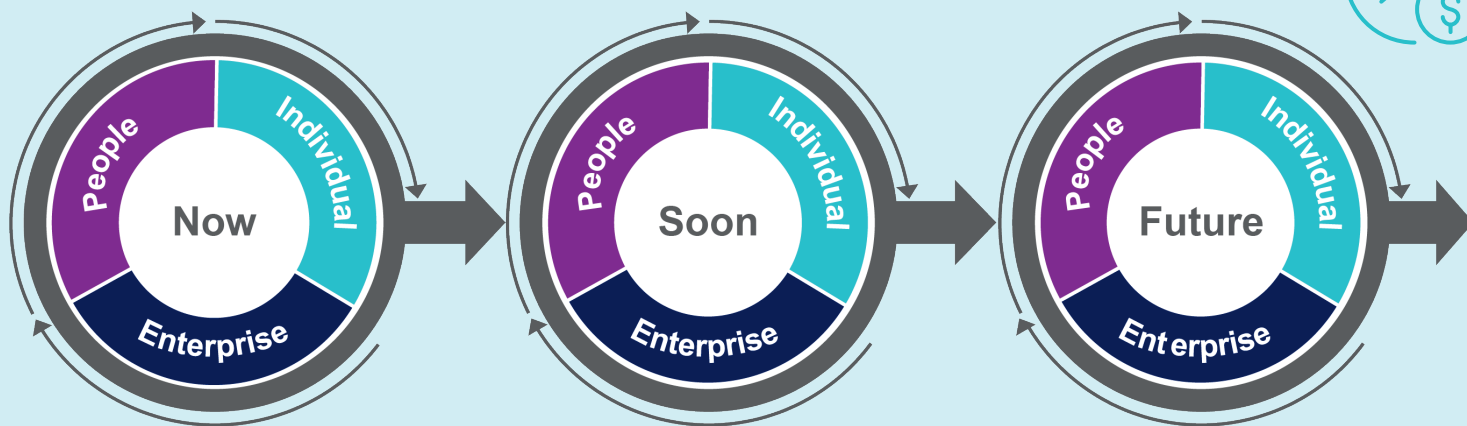
- Align and assess communication needs for long-term priorities
- Examine the employee experience, including evaluating key processes from new hire orientation to employee off-boarding
- Engage stakeholders and internal champions to support communications efforts in the future
- Plan to communicate when CARES Act provisions adopted with respect to retirement plans will expire

Leadership support priorities



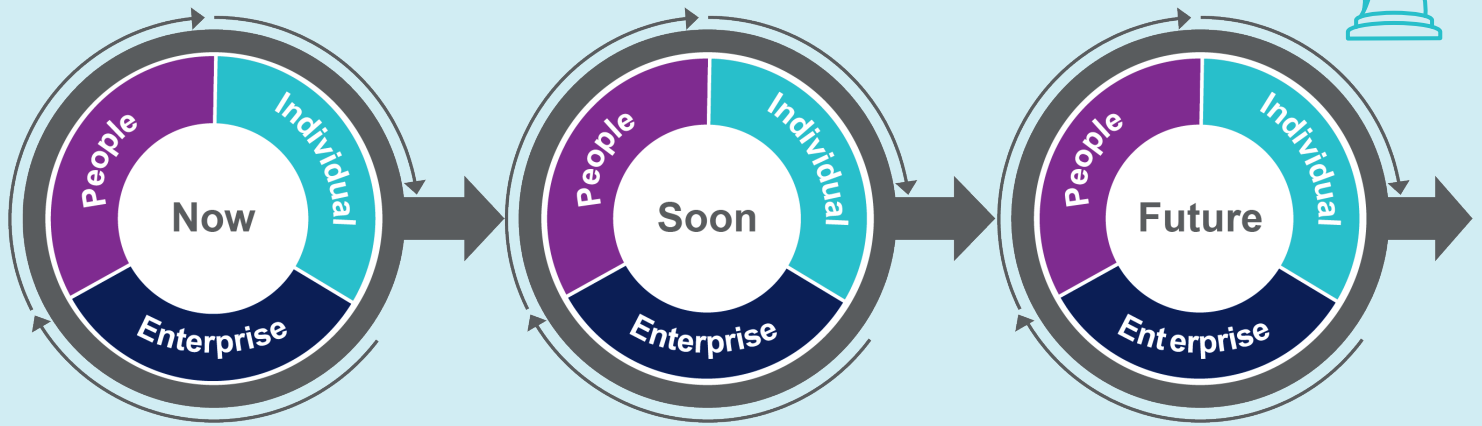
- Stay informed on fast- developing information from all critical sources (e.g., clients/customers, employees, markets, federal, state and local governments, shareholders, etc.)
- Leverage leadership team to inform critical decision-making
- Build agile decision-making processes
- Deliver authentic and candid communications to primary stakeholders (employees, internal leaders, clients/customers, board, shareholders, etc.)
- Create a central location for posting critical leadership messages
- Ensure that leaders are visible, accessible and speaking with a common voice
- Develop mechanisms to ensure leaders remain focused, calm and in control
- Develop strategy to manage the organization's cash flow needs (e.g., reduce expenses)
- Engage in strategic scenario planning for each timeline stage, and build an agile business plan for each (include workforce impact for each scenario)
- Regularly revisit and modify scenario-based strategic plans above, based on new data and information
- Explore leading practices in cost reduction
- Identify untapped opportunities to stimulate new revenues
- Ensure leadership team and key employees are being nurtured, respected and valued
- Create thoughtful plan and processes to regularly connect with customers, partners, providers and other external stakeholders
- Develop a process for crafting a new/modified vision for the organization's future
- Develop a process for collecting and analyzing organizational and operational insights gained during crisis
- Leverage insights to transform legacy organizations, operations, systems and policies
- Invest in effective change-management strategies for evolving organizations and cultures
- Develop approaches for providing ongoing coaching and leadership development to senior leaders
- Reevaluate when and if to return to pre-COVID-19 provisions
- Transition communication channels into the new normal for the business

Absence and time off priorities



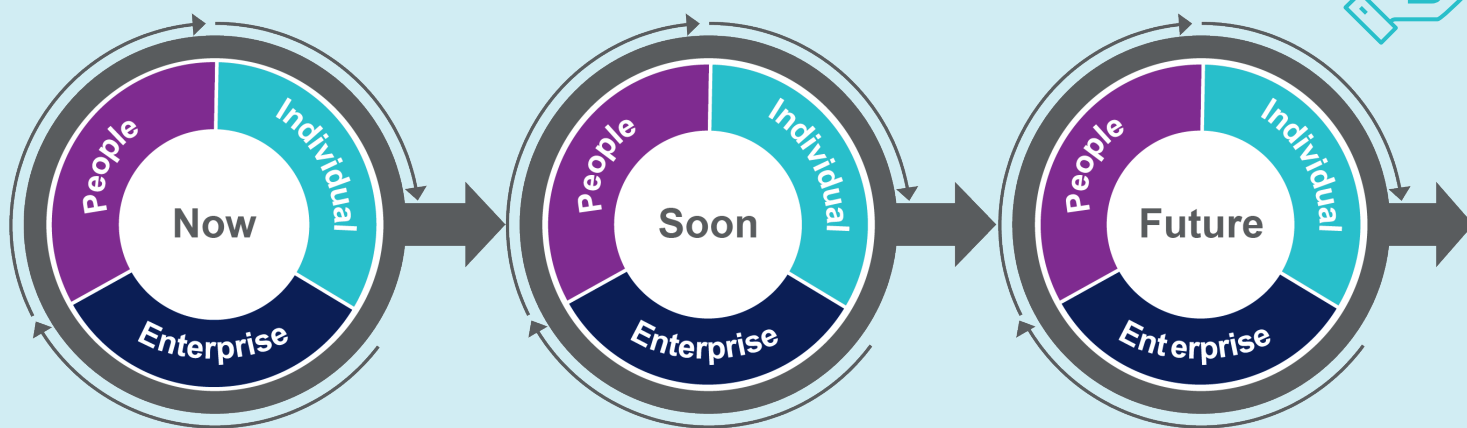
- Understand and implement applicable federal and state COVID-19-related paid and unpaid leave requirements
- Create means for measuring and implement any COVID-19 reporting required by regulatory agencies
- Clarify what the terms “furlough” and “lay off” mean in the context of your organization
- Communicate paid-time-off policies and how they interact with COVID-19-related programs and leave
- Discuss with disability carrier how COVID-19-related illness will be covered
- Project and then measure impact of COVID-19 on short-term disability claims
- Consider impact of work-from-home environment on paid-time-off utilization
- Explore paid-leave “donation” or “share” program among workforce
- Encourage employees to take time off and use their vacation days as appropriate for the business
- Expect high utilization of paid time off late in 2020, or modify use-or-lose policies
- Analyze and put a plan in place for future needs of workforce should there be a repeat of a pandemic
- Think about how COVID-19-related paid time off might affect workforce expectations moving forward
- Commit to ongoing employee and manager education around time off, leave and flexible work arrangements

Business continuity, incident and disaster response priorities



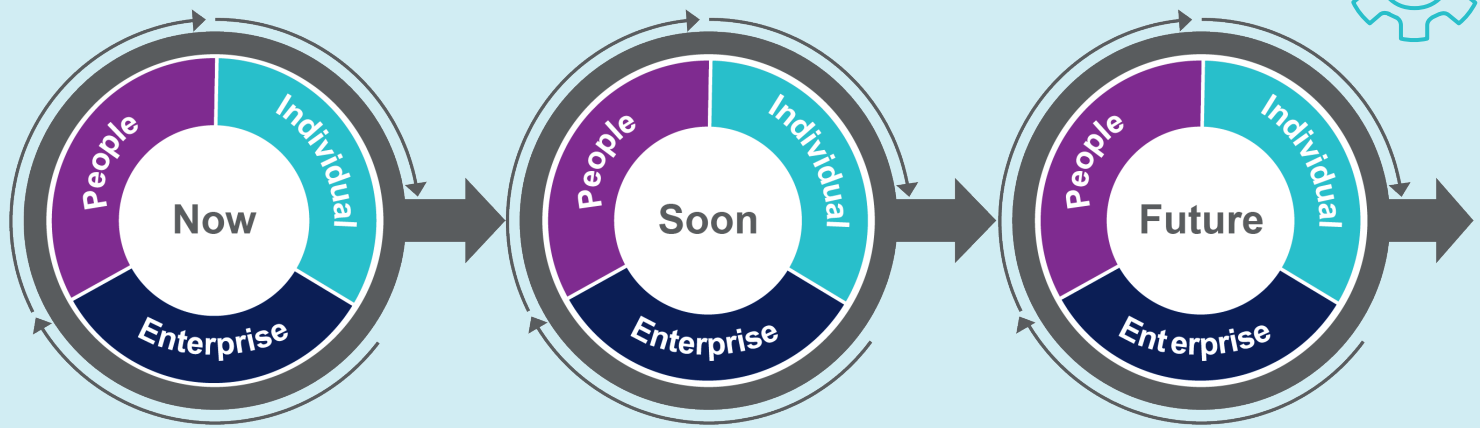
- Use business continuity plan and disaster recovery procedures
- Mobilize incident and disaster response teams
- Assess immediate impact and develop action plans (e.g., employee health, medical needs, availability and food, shelter and financial needs)
- Notify employees, contractors, customers, suppliers and vendors of status, restrictions, limitations and interim procedures (building access, travel, meetings, events, deliveries)
- Address potential technology and infrastructure issues (remote access software, network bandwidth, cyber security, IT Help Desk support)
- Identify and equip essential staff required to keep critical business processes operating
- Set up and support employees and contractors to work remotely as needed — adjust telecommuting policies if required
- Receive copies of all partner and vendor business continuity plans to clarify what to expect in terms of third-party service delivery and supply chain
- Stabilize supply chain (order management, new suppliers as needed and risk management)
- Update succession planning and emergency management response teams; update plan for key leader absence
- Create ongoing communication channel with all third parties to determine ongoing business continuity/disruption
- Create plan if organization experiences IT infrastructure disruption
- Review lessons learned in current crisis and update business continuity plan, emergency response and disaster response programs
- Establish an annual process to update the business continuity plan, emergency response and disaster response programs
- (Re)train designated business continuity response teams
- Reassess whether vendor business continuity and disaster recovery met enterprise and people needs

Financial security and retirement savings priorities



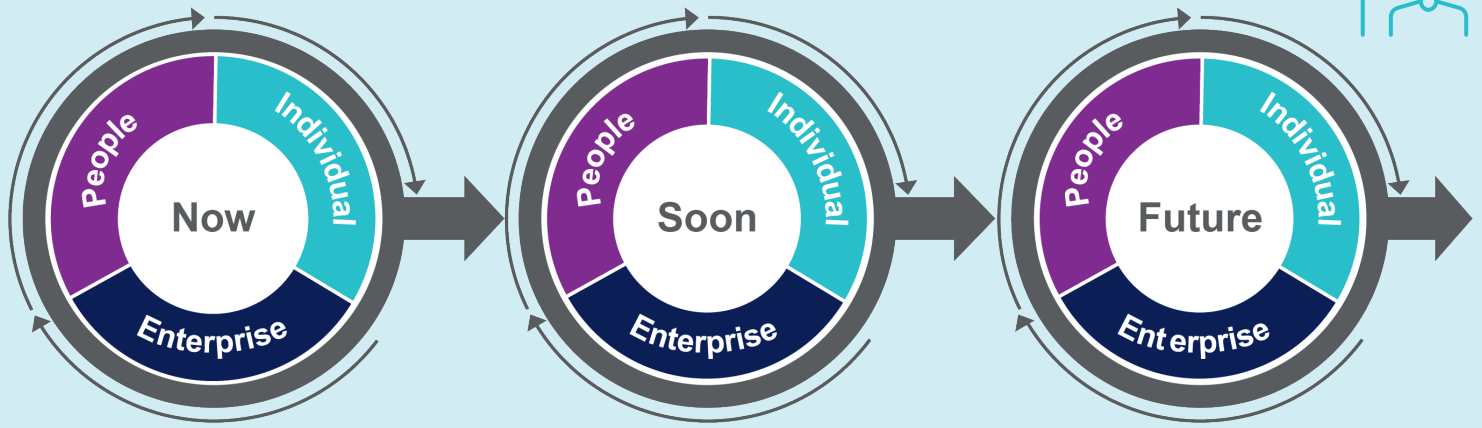
- Address employee financial security through programs and deliberate communication, including:
 - Financial wellness benefits
 - Financial counseling
 - 401(k)/403(b) loan and withdrawal provisions
 - Student loan assistance programs
 - Section 139 tax-free disaster assistance
 - Confirm payroll continuation
 - Determine payment of owed or upcoming bonuses, commissions, other variable pay
- As appropriate, provide information on applying for government assistance
- Consider eligibility provisions of all retirement and financial security programs and treatment of furloughed and/or laid-off workers in retirement plans/benefits
- Review workforce planning impacts and impact on retirement plans (e.g., accounting implications [curtailment, settlement, special termination benefits, etc.], funded status changes, impact of partial plan termination and/or PBGC 4043/4062(e) for defined benefit pension plans)
- Identify and address PBGC reportable events, such as active participant reductions, control group changes and loan defaults
- Communicate available retirement plan loans and distributions to cover immediate financial hardship
- Continue communications that address access to financial security programs
- Decide whether to adopt CARES Act expanded distribution and loan provisions as a way to address employees' immediate financial needs
- Coordinate with retirement plan vendors to implement the mechanisms to meet CARES Act provisions
- Prepare to explain any CARES Act provisions not adopted (i.e., concern about retirement savings leakage)
- Consider CARES Act's tax-advantaged student loan repayment benefit (\$5,250 of income tax-free contributions to pay down loans)
- Coordinate workforce strategy with retirement plan provisions (e.g., VSIPs, lump-sum windows, etc.)
- Consider opportunities to manage pension plan risk through tools or revised strategies (e.g., ALM pension risk transfer)
- Consider preparing/requesting updated projections of DB plan funding and/or accounting costs in light of current market conditions
- Provide resources to support individuals as they reconsider and reset financial security and retirement goals, priorities and planning
- Work with investment advisors to evaluate and make any necessary changes to plan investment options
- Consider implementing additional financial security programs (e.g., debt consolidation, literacy, emergency funds, retirement savings, etc.); consider pros/cons of DB plan termination
- Amend or update required documents (e.g., plan documents, notices, SPDs, policies, etc.)
- Reassess overall retirement readiness goals for workforce
- Take another look at plan design options under the SECURE Act and other guidance in relation to the COVID-19 environment
- Review internal and external processes and protocols for retirement plan operations (e.g., governance, best practices, fiduciary training, process documentation)

Payroll and compensation priorities



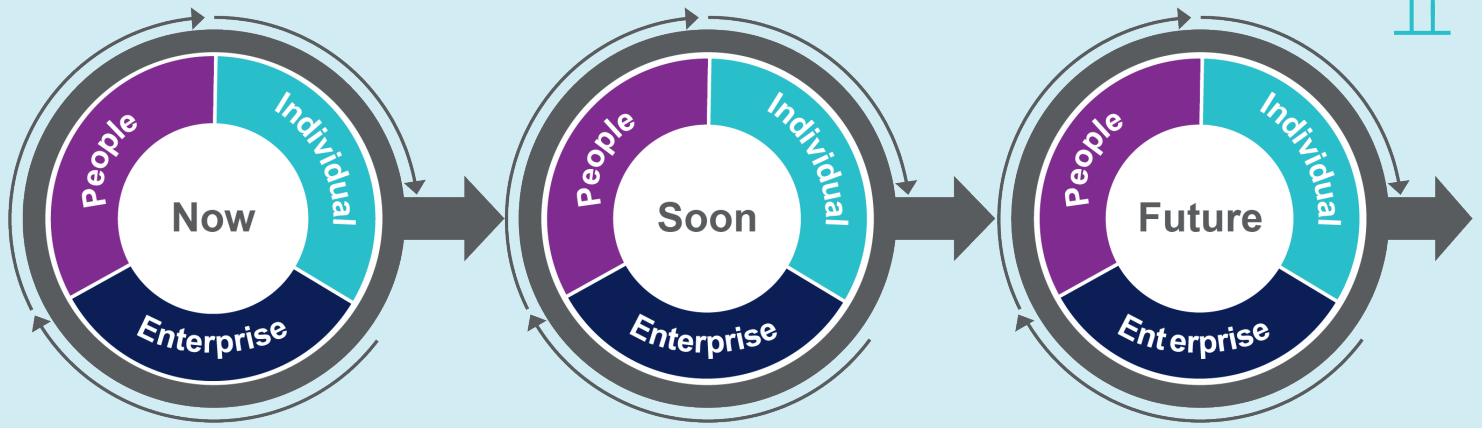
- Confirm off-site payroll processing management
- Examine pay actions to preserve cash; consider necessary:
 - Pay freeze/reduction
 - Promotional increase deferral
 - Treatment of new hires
 - Furloughs versus layoffs
- Manage nonexempt pay/overtime
- Review hazard pay for essential services employees
- Review available government assistance to aid in payroll continuation
- Ensure employee deferrals are deposited and invested timely according to DOL regulations
- Review pay equity in consideration of needed workforce changes
- Review severance pay programs, levels and eligibility
- Review and craft alternate performance targets for sales and other incentive plans during crisis
- Examine executive compensation strategy, compliance and optics
- Consider early retirement windows and benefits/pay issues related to such a program
- Educate around total compensation, especially if benefits or pay cuts are planned
- Evaluate job and market pricing
- Evaluate the continued relevancy, competitiveness and sustainability of the Rewards of Work™ offered by the employer
- Determine go-forward variable pay and equity opportunities
- Update and communicate pay policies and protocols for current employees, reboarded employees and new hires

Remote work priorities



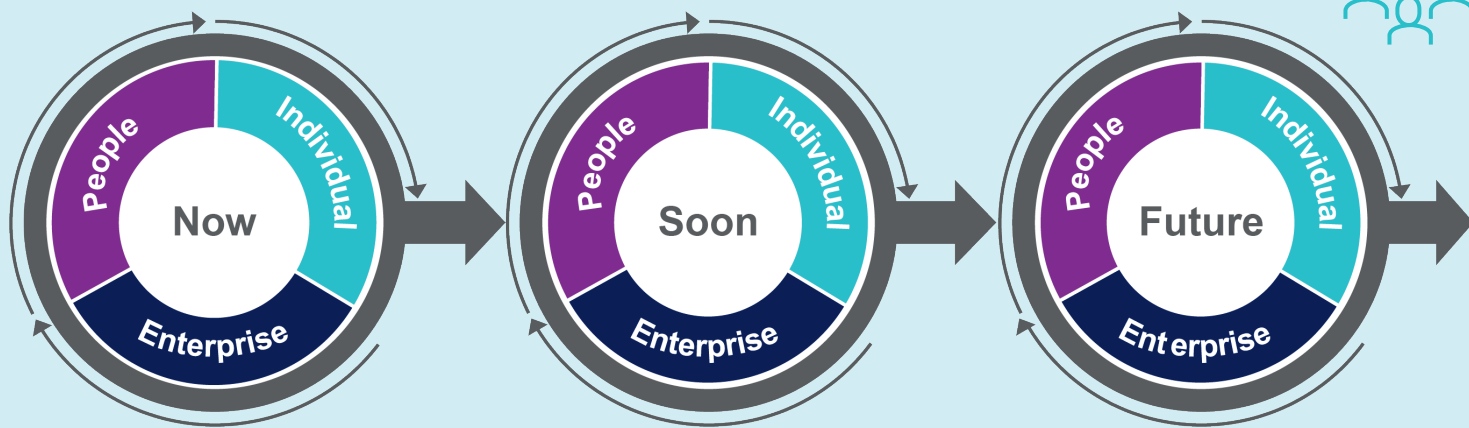
- Create technology infrastructure to enable employees to work remotely in a secure environment
- Distribute guidance on effective remote work practices
- Provide basic training for online tools and applications
- Develop processes and mechanisms to regularly connect with remote workforce
- Continuously monitor the environment to assess and mitigate challenges
- Consider technology and security needs
- Develop more detailed/ permanent policies for remote work
- Assess risk management factors and design policies/ strategies for mitigating risks
- Evaluate opportunities to extend work-from-home roles beyond crisis period
- Develop performance management process and expectations for remote work
- Plan for back-to-office procedures — on-site thermometers or testing, protected privacy, etc.
- Train/communicate HR professionals and managers to understand how to lead employees working remotely
- Assess lessons learned from crisis period and evaluate new opportunities to extend remote work options
- Refine workflow and processes to enable more remote workforce opportunities
- Review visitor protocols and appropriate questions related to exposure
- Revisit telecommuting policies

Legislative and regulatory priorities



- Be aware of and analyze federal COVID-19 legislation impact on business, workforce and benefits
- Understand which provisions of federal COVID-19 legislation apply to your organization
- Follow rapidly developing federal regulatory guidance
- Determine applicable state and local COVID-19 requirements
- Engage with government relations professionals and legal counsel to help shape future COVID-19 guidance
- Engage with trade associations and local industry groups to identify best practices and areas where more guidance may be needed
- Prepare business and workforce for anticipated future COVID-19 legislation and regulatory guidance
- Create appropriate communications related to new legislation and regulations for clients/customers and workforce
- Figure out how to handle any conflicting requirements from different state and local jurisdictions
- Review legal documents (such as plan documents, notices, SPDs, HR handbook, policies, etc.), and revise for necessary and optional updates and amendments
- Communicate these changes to the workforce
- Be prepared to analyze and react quickly to future COVID-19 guidance

Vendor management priorities

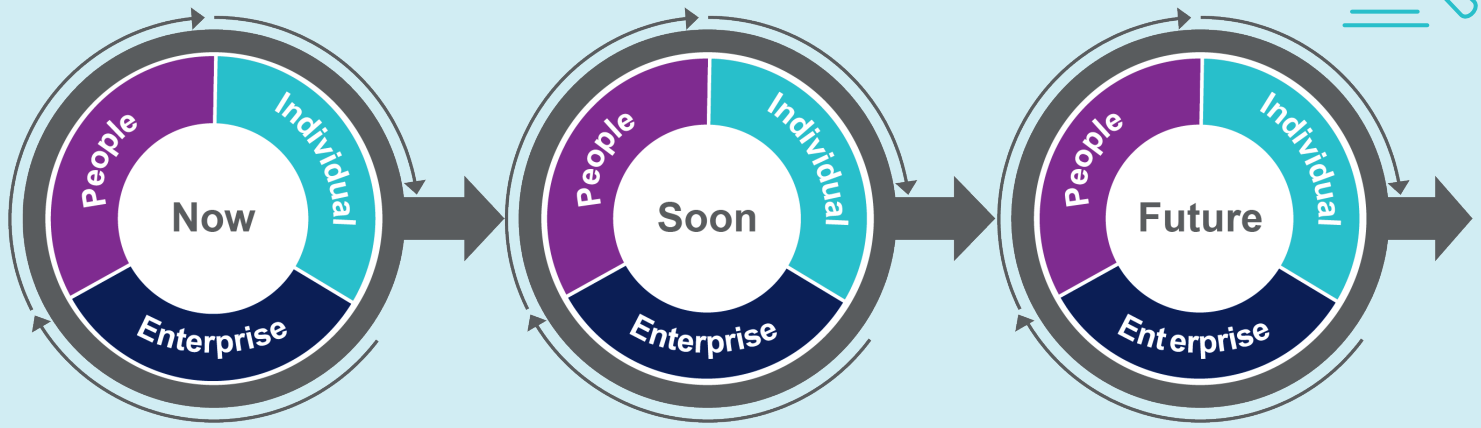


- Contact vendors, partners and other advisors to determine ability to continue goods and services, as well as contract fulfillment
- Request regular status updates
- Work with HR and employee benefit vendors to ensure that ongoing administration and operations are not interrupted (e.g., claims processing, benefit payments, mitigation of high call volumes, processing of increased distribution and loan requests)
- Confirm all vendors are prepared to handle changes prompted by the COVID-19 situation (such as FFCRA and CARES Act provisions)

- Review vendor contracts to determine service guarantees
- Review HIPAA business associate agreements for the same
- Review errors and omissions insurance policies for vendors who cannot perform services

- Review current vendors, partners and business associates to determine needed revisions to contracts; carefully review service guarantees, limitations of liabilities and indemnification provisions
- Consider newly needed or alternate sources of goods/services
- Review external processes and protocols for employee benefit plan operations (i.e., best practices, process documentation)
- Evaluate whether service level agreements (SLAs) have been met during crisis
- Determine whether states have required action by carriers to refund premiums or otherwise return profits
- Consider assessing and coordinating vendor communication activities to align with your goals

Compliance priorities

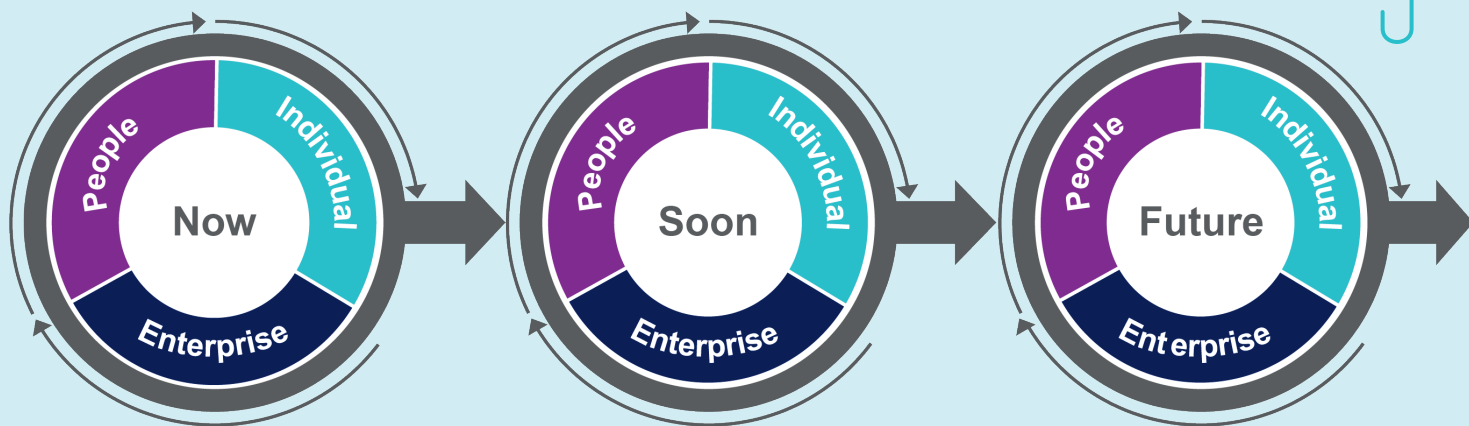


- Because workers' compensation laws vary by state, determine strategies to manage workers' compensation risks for telecommuters and remote employees
- Review federal and state WARN Act requirements for furloughs and layoffs
- Conduct risk assessment for possible claims (i.e., discrimination) in connection with furloughs and layoffs
- Ensure employee deferrals are deposited and invested timely according to DOL regulations
- Understand modified due dates for notices and disclosures where agencies have granted relief
- Understand unemployment benefits and supplemental COVID-19 payments

- Review all insurance policies to determine coverage and liability categories are sufficient in light of crisis (e.g., fiduciary liability, employment practices, directors/officers, umbrella, etc.) (See brokerage page for more information.)
- Review contracts for force majeure clauses
- Review contracts to confirm service guarantees
- Reconsider and possibly update remote work and paid-leave policies
- Review employment agreements, and offer letters to determine terms are consistent with changes in workforce needs

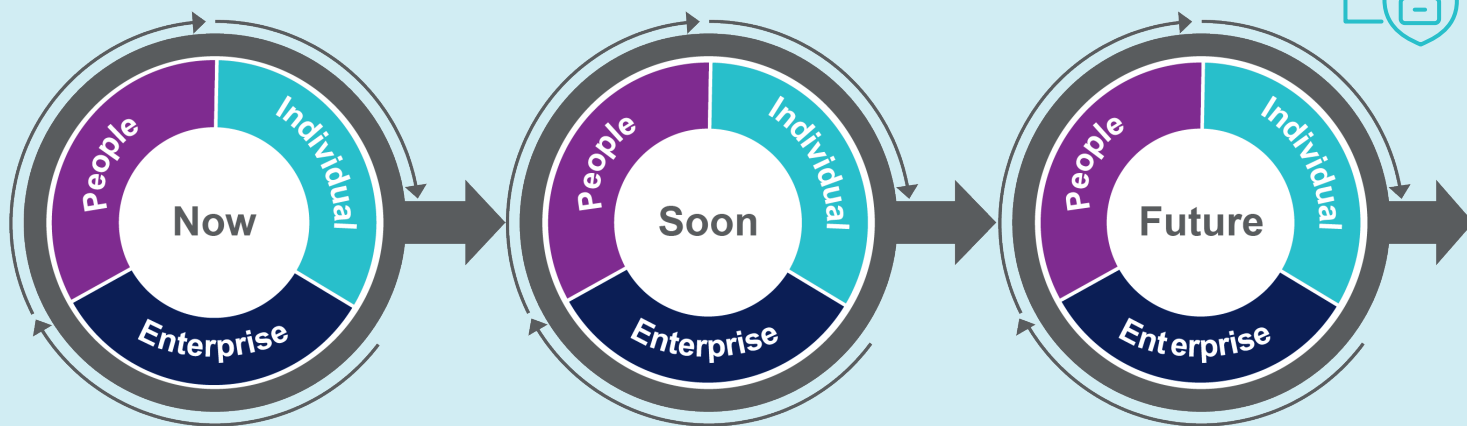
- Review errors and omissions insurance policies to determine sufficient coverage levels. (See brokerage page for more information.)
- Review directors and officers insurance limits and insolvency coverage
- Update required documentation, notices, postings, policies and procedures, employment policies, etc., to reflect changes that have been made in the interim

Insurance brokerage and risk mitigation priorities



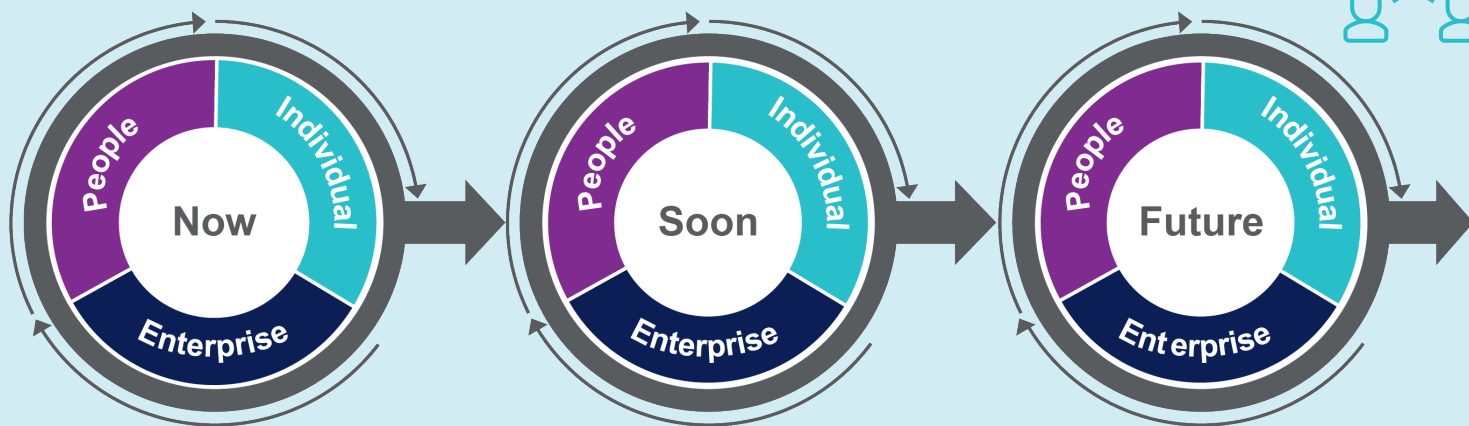
- Review property and casualty insurance, as coverage may vary by state and may not cover COVID-19 or other pandemics
- Notify property and casualty carriers of remote workers
- Review short- and long-term disability policies to cover absences
- Review workers' compensation policies, and make necessary changes to account for larger remote workforce or essential workers employed during crisis, if applicable
- Review disaster recovery planning and business continuity plans to help sustain business operations
- Review and update fiduciary liability policies to account for layoffs, disputes, administrative errors and omissions due to COVID-19
- Assess cyber risk through incident response planning to prepare for a data event
- Review cyber liability insurance policies and fidelity bonds to determine if adequately protected
- Review event cancellation insurance
- Review employment practices liability policies to determine if coverage is sufficient, and verify coverage for third-party claims
- Review and update accidental death and dismemberment policies
- Determine if in-house counsel exposed for COVID-19 advice
- Review lessons learned from crisis, and consider if update needed in umbrella liability policy or general errors and omissions insurance
- Review employment practices liability insurance related to hiring practices and exposure
- Review director and officer liability insurance limits and insolvency coverage
- Review long-term risk profile of retirement plans
- To the extent possible, negotiate to have contracts reflect a possible reoccurrence
- Review educators liability insurance, if applicable, to confirm protection for cancelling educational training programs
- Review supplemental life, AD&D, disability and other voluntary benefits offered to workforce

IT security and data integrity priorities



- Review risk analysis and IT security protocols to determine necessary updates
- Stay aware of latest malware affecting businesses in light of COVID-19
- Disseminate communications to create awareness of increased malware and mitigation efforts
- Address current IT hardware needs, especially with additional remote workforce or new workforce needs/hires
- Consider new collaboration tools to support business continuity
- Review security and data integrity of all HR, benefit and payroll systems
- Use pre-breach loss prevention tools, including online training and other protections while working remotely, that are provided by most cyber liability insurers
- Review current IT hardware and software needs, gaps and contracts, and update as necessary
- Review all electronic document management, backup, and storage systems and protocols
- Create plan if organization experiences IT infrastructure disruption
- Review electronic document destruction procedures
- Conduct yearly IT security risk analysis
- Review and update all cyber security insurance policies
- Review business associate agreements for all IT security provisions
- Review fidelity bonds and cyber liability policies to consider protection against social engineering
- Update access controls to account for succession plans and emergency access if key personnel are absent from work

Infrastructure management priorities

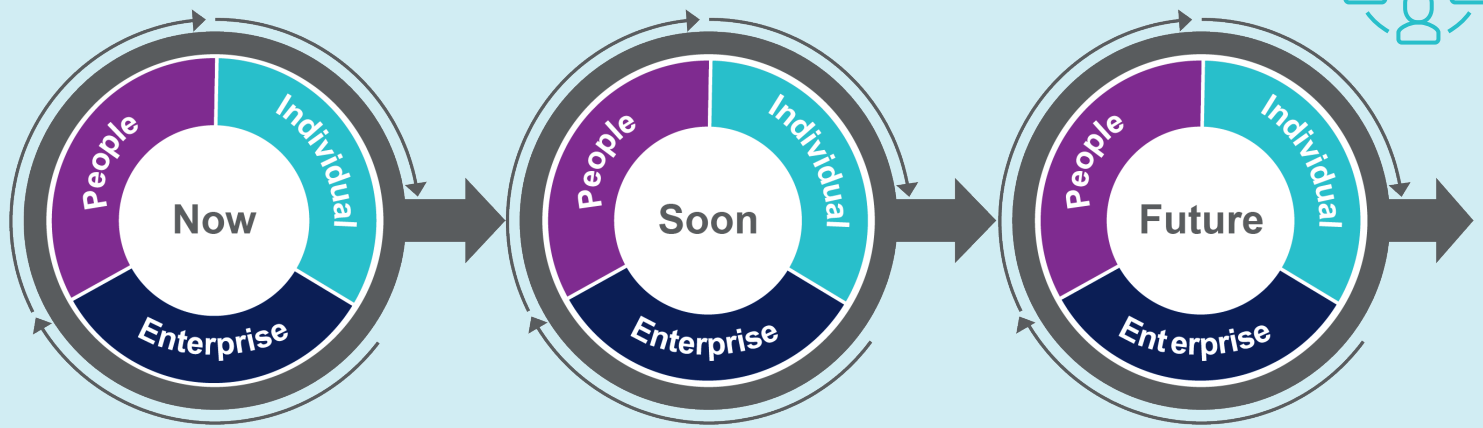


- Determine on-site staffing needs
- Reconsider on-site utility needs, supplies, generators, etc.
- Distribute on-site protective gear (e.g., masks, gloves)
- Identify need for and implement collaboration tools needed to continue workforce and customer/client service delivery
- Determine mail/package on-site recovery

- Review equipment needs with growing use of a remote workforce
- Assess ADA compliance and other legal issues related to real estate and workspace
- Reconsider workforce and client/customer service real estate needs
- Consider and implement new document management, storage and destruction protocols
- Determine on-site visitor policy during crisis
- Review and update mail/ package delivery processes

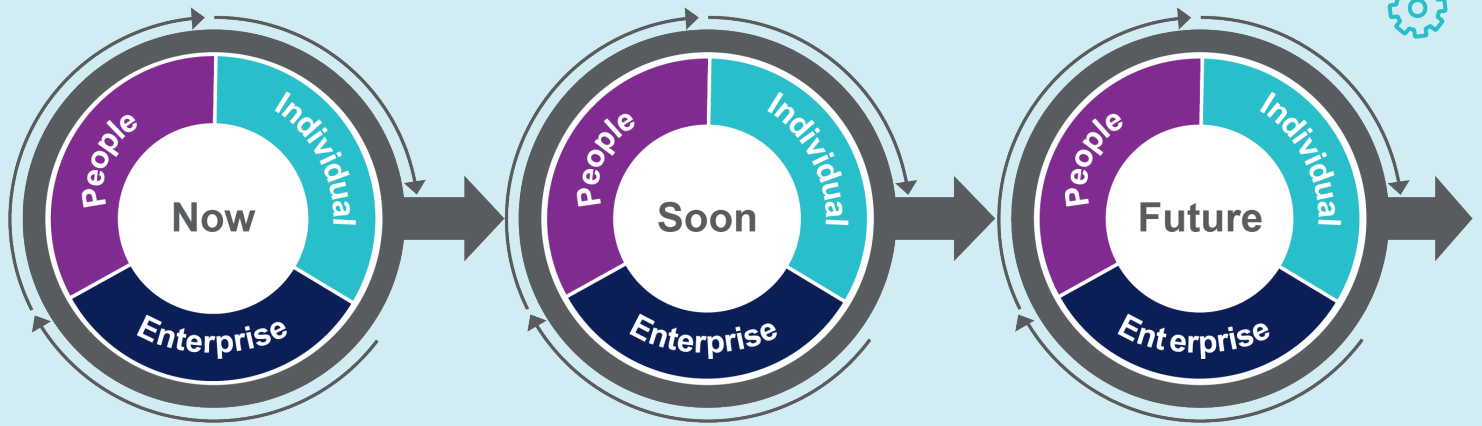
- Reconsider workspace design to optimize productivity
- Revise workspace policies to reflect new normal (e.g., hoteling, shared workspace, WeWork space, rules of engagement, etc.)
- Reconsider on-site workforce philosophy, culture and plan
- Review new physical location model (e.g., hub and spoke, temporary office space, shared space, etc.)
- Identify and activate necessary collaboration tools to complement new workspace/productivity models
- Review visitor protocols and appropriate questions related to exposure

Workforce planning priorities



- Apply value/mission-based approach for making staffing decision
- Develop strategies for reducing labor costs (e.g., explore new/alternative staffing and compensation approaches)
- Consider talent acquisition issues: people who have been given offers and job candidates
- Determine the need for and adjustments to summer interns or other seasonal employees, and communicate to all such populations
- Track employee engagement levels, performance, productivity and morale
- Evaluate new approaches to workforce competency and capacity needs
- Review workforce policies and align them to new normal (e.g., remote work/telecommuting, travel, IT resourcing, talent acquisition, incentive designs, etc.)
- Review the use of all independent contractors and gig workers to determine go-forward needs; communicate changes to contracts, expectations or needs accordingly
- Consider ability to leverage technology to reduce or redeploy workforce
- Evaluate IT needs of workforce and prioritize changes/enhancements
- Begin identifying organizational norms/culture that makes handling this crisis challenging
- Consider necessary changes to performance management while still in crisis
- Reevaluate summer-hours policies in light of work-from-home orders or other business needs, and communicate changes as necessary
- Assess workforce lessons learned from crisis, including increased remote workforce, use of gig economy, role of vendors, performance management model, productivity, etc.
- Consider new service delivery models that align with changes in business plans
- Reimagine roles, responsibilities and accountabilities to reflect new normal, as appropriate
- Redesign processes and workflows
- Finish updating and aligning workforce policies
- Create strategy and implementation plan to evolve the enterprise's culture to better address the new normal (this may impact talent acquisition strategy and performance management)
- Evaluate the effect capital market declines will have on employee turnover (and retirements)
- Reconsider enterprise's strategy related to workforce financial security and retirement readiness

Career strategies priorities



- Identify essential-services employees and any other core operational teams
- Continue performance management, but revisit goals necessary to support current environment
- Reconfigure work content and reporting relationships
- Determine necessary promotion cycle adjustments
- Review and implement training and development budgets and delivery
- Create/revise individual performance expectations and priorities
- Communicate expectations around performance, learning and career development
- Reconsider on-site, travel, remote work and flexible schedule policies
- Revamp career architecture, promotion process and pathways, and ensure employees see career development opportunities
- Determine go-forward employee development programs and policies
- Update succession plan and candidate pools

Visit our frequently updated COVID-19
resource page: segalco.com/covid-19

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