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Technical Information Paper Series

*Innovative Safety and Health Solutions*_{SM}

Telecommuting

Telecommuting is a relatively new and increasingly popular work option which has the potential to provide significant benefits for both employers and employees. Telecommuting offers a flexible work arrangement in which selected employees work from their homes for a predetermined number of days per week. It has been described as "moving the work to the workers, instead of the workers to work."

The number of companies that are developing and implementing formal telecommuting programs has increased. Some have developed telecommuting programs in response to legislation, such as the Clean Air Act Amendments of 1990, the Americans with Disabilities Act, and the Family Leave Act.

Telecommuting opportunities are offered to many types of workers, such as word processors, data entry operators, information management staff, writers, and researchers. Some companies have instituted telecommuting for customer-focused jobs such as technical support staff, customer service, catalog sales, and travel agents. Less traditional approaches in telecommuting include arrangements for those who work in human resources, finance, engineering, marketing, or manufacturing.

Benefits of Telecommuting

Many benefits of telecommuting have been identified:

- increased productivity
- expense savings
- decreased turnover
- decreased absenteeism
- increased labor pool
- improved morale
- decreased commuting time
- increased flexibility in work schedules
- decreased rush hour traffic (and therefore decreased air pollution)
- reduced need for office space

Increasingly, insurers are relying on telecommuting as a return-to-work strategy for injured employees who have workers' compensation claims and who typically experience delayed return to work at the job site.

Design For Success

In order to realize the benefits of telecommuting, however, employers must design programs carefully to minimize potential obstacles. For example, employers must address technical requirements, legal issues, and tax issues, and must establish guidelines governing conditions of participation and equipment use, and policies addressing liability issues.

The following conditions are necessary prerequisites for a successful telecommuting program:

- ☐ The work must be independent in nature.
- ☐ Participating employees must be productive, responsible, highly motivated, and skilled in their jobs.
- ☐ Participating supervisors must be willing and able to supervise without being in constant contact with employees.

Supervisory and Managerial Issues

Telecommuting arrangements require more trust and less hierarchical control between management and employees. In many operations, this necessitates a change in managerial philosophy and style, and development of different ways of supervising. A successful telecommuting program also requires management commitment, results-oriented management (vs. process-oriented management), good planning, and different kinds of communication and feedback mechanisms.

Safety and Accident Prevention Issues

Telecommuting operations certainly are not exempt from the safety concerns present in any business setting. In fact, some believe that telecommuting presents unique safety issues. Experience has shown, however, that these safety issues are not insurmountable and are, in fact, very manageable, particularly when they are addressed in the planning process. Administering a safety program at a remote location can be challenging, but this challenge can be met by establishing clearly communicated goals and objectives.

An employer may inspect the home offices of its telecommuters to ensure compliance with safety requirements. The inspection would address:

- ☐ computer and information security measures
- ☐ smoke and carbon monoxide detectors
- ☐ fire extinguishers
- ☐ adequacy of extension cords and the grounded electrical system
- ☐ furniture and equipment specifications
- ☐ (separate) telephone lines
- ☐ post office box address
- ☐ portable heating equipment

Employers should provide training to assist each telecommuter in setting up a safe work environment at home. Some companies use a formal telework safety policy and agreement that employees are required to sign. The popularity of formal telecommuting safety policies is growing.

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Risk Factors

Telecommuters face many of the same kinds of hazards as on-site workers and their employers:

- ☐ work related injuries and illnesses
- ☐ ergonomics
- ☐ fire prevention
- ☐ ventilation
- ☐ electrical safety
- ☐ property damage to premises or equipment
- ☐ information security

Other risks associated with telecommuting include:

- ☐ security issues
- ☐ confidentiality/privacy issues
- ☐ injuries to people who visit the worker's home office

Telecommuting and OSHA

Employers are responsible for ensuring a safe work environment, whether their employees are working on-site or at home. To date, the U.S. Occupational Safety and Health Administration has not published a policy regarding work at home employees. However, OSHA is reported to be developing draft guidelines for telecommuting safety. These draft guidelines would likely establish employer responsibility for employee safety in both traditional and non-traditional settings. (This responsibility is based on the Occupational Safety and Health Act of 1970, which covers any work performed by an employee in any workplace within the United States.)

OSHA does not plan to inspect private homes; however, OSHA has recognized that employers need some control over the workplace. In fact, even in the absence of OSHA regulation of telecommuting, it is possible that a major work-at-home accident could result in an OSHA investigation, and a possible citation under OSHA's general duty clause. In any case, it is in the employer's best interest to protect all employees by encouraging and supporting safe work conditions, safe work practices, safe behaviors, and positive attitudes towards safety and accident prevention.

OSHA recordkeeping requirements do apply to employees who work at their homes. Injuries and illnesses that occur to employees working at home locations are recordable on the employer's OSHA 200 Log, if they are work-related and if they meet the criteria for an OSHA recordable injury or illness under 29 CFR Part 1904.2 and the Recordkeeping Guidelines for Occupational Injuries and Illnesses (see OSHA Recordkeeping Guidelines). If an employee is injured or becomes ill while performing duties in the interest of the employer, the case would be considered work-related.

OSHA-required safety measures, appropriate to specific exposures as they exist in the telecommuting environment, are warranted. For example, Material Safety Data Sheet (MSDS) requirements apply if the employee performs work for the employer that involves exposure to any chemical substance covered by OSHA regulations. The employer need not supply an MSDS if the hazardous chemical is a consumer product that is being used by an employee in the home office for the consumer purpose intended by the manufacturer, and if the use results in a duration and frequency of exposure which is not greater than that experienced by consumers.

As other exposures exist, specific OSHA requirements may apply, such as:

- ☐ Lockout/Tagout
- ☐ Confined Spaces
- ☐ Bloodborne Pathogens
- ☐ Means of Ingress and Egress (entrance and exit)
- ☐ Personal Protective Equipment
- ☐ Emergency Plans
- ☐ Medical Assistance Services and First Aid Kits and Training
- ☐ Lead Levels in Old Paint

Enforcement would likely be on a case-by-case basis.

Telecommuting and Workers' Compensation

While workers' compensation coverage issues, even in traditional settings, are not always clear-cut, the lines of demarcation between what is and is not covered are perhaps even less clear in a telecommuting situation. No legal precedent has been set regarding telecommuting, since the courts have not yet decided in specific cases, and since the government has not issued regulations which specifically apply to telecommuters. The specific circumstances of each claim are likely to drive coverage determination. Again, planning ahead is critical.

The following control measures are recommended:

- ☐ Set guidelines to assist in the determination of whether or not a telecommuter's injury at home is work-related.
- ☐ Require a separate office area in the home, to help define "on the job" and "work area."
- ☐ Equip the work area with appropriate equipment and furniture. Consider ergonomic factors.
- ☐ Reserve the right to inspect the office for safety.
- ☐ Outline proposed work hours.

Ergonomics

Ergonomics in telecommuting is an important issue. Develop specific ergonomic guidelines for personal computer use. These guidelines should incorporate recommendations for optimal position of the body and equipment as well as workstation configuration guidelines. Workplace ergonomics in any location requires consideration of the following factors:

- ☐ components of the physical workstation (including furniture, equipment, tools, materials)
- ☐ location, dimensions, and adjustability of the workstation components
- ☐ job functions
- ☐ work flow (including schedules, breaks, overtime)
- ☐ body posture

How to Initiate a Telecommuting Program

Companies that have implemented successful telecommuting programs agree on the following recommendations:

- ☐ Set up a task force (including managers, employees, IM/IS, and human resources).
- ☐ Establish policies for telecommuters and supervisors. Develop a well thought-out telecommuting contract, which covers frequency, duration, performance measures, equipment, and the process for terminating the arrangement.
- ☐ Collaborate with unions.
- ☐ Develop training for telecommuters and supervisors. The training should include an orientation on what telecommuting is and how it works, job and employee criteria for telecommuting, policies and procedures, safety, workstation set-up, etc.
- ☐ Start with a small pilot program.
- ☐ Establish criteria for selection of telecommuting employees, and select telecommuters carefully.
- ☐ Analyze work processes and identify positions suited for telecommuting.
- ☐ Develop clear procedures for office and support functions (e.g., mail, office routing, phone messaging, library/information services, record keeping). Administrative checklists are helpful.
- ☐ Determine equipment needs and how equipment will be provided (who pays for, transports, and insures equipment).
- ☐ Develop a contingency plan for equipment/systems failure.
- ☐ Determine technical support needs and implement access procedures.
- ☐ Schedule "face time" with telecommuters and supervisors.
- ☐ Define the performance evaluation process.
- ☐ Set realistic, well-defined goals and objectives for employee performance.
- ☐ Define organizational structure and where telecommuters fit in.
- ☐ Keep telecommuters informed of workplace news (don't assume they "don't need to know").
- ☐ Schedule times for communication with telecommuters.

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