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| **YOUR COMPANY NAME**  **POLICY:**  **COVID-19 Program and Exposure Control Plan** |  |

**PURPOSE:** The purpose of this program is twofold:

* To continue to protect the health and safety of our work force and by extension their families, and
* To implement mandatory health and safety requirements as required by the [state] Department of Health, Centers for Disease Control and Prevention (CDC) Guidelines, [state] Occupational Safety and Health Administration (OSHA) and other applicable guidelines. Using the measures provided by these agencies, our company will strive to protect the health of our employees. This program will document the measures we use to comply with the provided guidelines.

**DEFINITIONS:**

**COVID-19** - COVID-19 is a respiratory disease spread from person to person. SARS-CoV-2 is the virus that causes COVID-19.

**RESPONSIBILITIES:**

**Health Officer:**

Mandatory – All businesses must have a designated Health Officer for all shifts:

* This person is responsible for ensuring compliance with the mandatory health and safety requirements as set forth above.
* This person shall have the authority to stop or modify activities to ensure work conforms with the mandatory health and safety requirements

Our Health and Officer is Name of Person or position for each shift */s*

**Administrative Person** – this may be the Health Officer:

Name of Person or position will be responsible for the administration of the following plan

including the following;

* Assess the hazards in this workplace (see Hierarchy of Controls in this document)
* Administer and update this program as necessary
* Regularly review guidance from state, federal and local government agencies
* Review the effectiveness of this program
* Participate in any investigation of employee complaints / failure to comply with company rules
* Provide effective training reference for COVID-19 including the preventive measures the company has taken and that the employee must follow.

**Volunteer First-Aid Squad (if you have one)**

* Act in accordance with this policy and wear personal protective equipment appropriate for patient care regardless of if the patient is known to be COVID-19 positive or not.
* Act as a first aid squad member

**Department / Location Managers**

* Ensure that all employees follow the protective measures outlined in this program.
* Enforce compliance with this program using the existing disciplinary structure of the company
* Ensure training for COVID-19 protection has been completed and documented in accordance with the company guidance

**Employees**

* Follow all rules and practices created by the company, including, but not necessarily limited to:
  + Participate in all trainings relative to COVID-19
  + Stay home if you are sick
  + Wash hands frequently
  + Practice Social Distancing – 6 foot minimum
  + Report to your HR person if you feel sick, have a temperature, or you have had close contact with a person suspected of having COVID-19
  + Wear protective PPE as outlined by this company
  + Wear protective cloth mask as outlined by this company

**EXPOSURE DETERMINATION - General Information**

This information is provided from the **[state] OSHA’s Mandatory Health and Safety Requirements for all Business, Nonprofits & Government Operation as required by the [state] Dept of Health, CDC Guidelines and [state] OSHA [state OSHA website]**

* Workers in certain sectors have a high risk of occupational exposure to COVID-19, including:
* Healthcare and Laboratories
* Emergency response
* Mortuary services and other death care
* Airline operations
* Border protection and passenger screening
* Workers that are in a medium exposure risk are:
* Jobs that require frequent (i.e., more than a few minutes) and/or close (i.e., within 6 feet) contact with people who may be infected with SARS-CoV-2, but who are **not** known or suspected COVID-19 patients.

Examples include:

* Critical retail workers, such as those in pharmacies and grocery stores.
* Transit workers, such as bus drivers, subway operators, and taxi drivers.
* Workers in other transportation operations.
* Workers that are in a low exposure risk are:
* Jobs that do not require contact with people known to be or suspected of being infected with SARS-CoV-2, nor frequent close contact with (within 6 feet) of the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

**EXPOSURE DETERMINATION YOUR COMPANY NAME**

The first step this company has taken is to conduct a hazard assessment to determine our risk level and exposure potential. The following was determined.

Fill this section in with your information

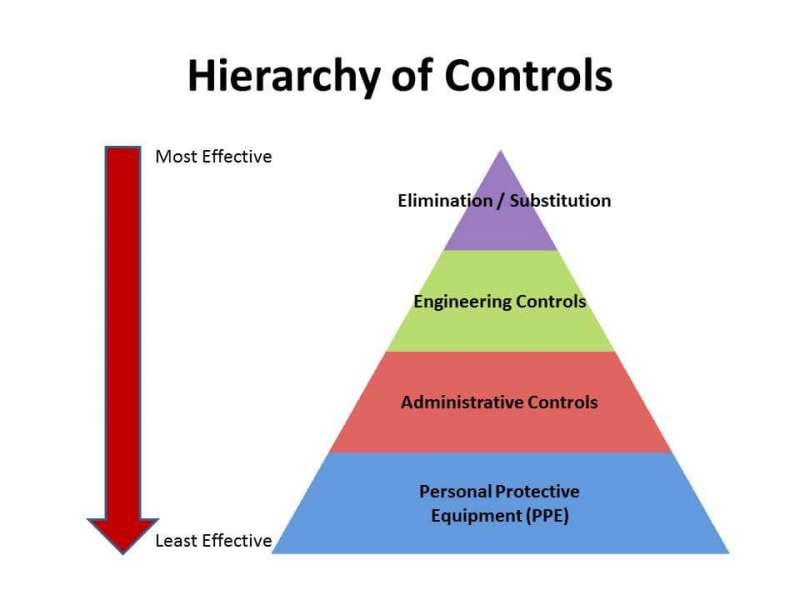
High Risk Employees or Job Descriptions

Medium Risk Employees or Job Descriptions.

Low Risk Employees or Job Descriptions.

**Hazard Reduction**

As with all hazards, it is this Company’s goal to eliminate the hazard if possible. Using the Hierarchy of Controls and the [STATE] OSHA Mandatory Health and Safety Requirements for all Businesses it is our goal to minimize the hazard.



* + 1. **Elimination**

We have reviewed our tasks - the following practices have been evaluated:

1. Working Remotely - The State of [state] [applicable] Agency is requiring all business, non-profit and government operations work remotely whenever possible –
2. Meetings and trainings conducted via internet
3. Client patient services done via internet
4. Other

The practices that this company has eliminated and replaced with alternative methods are:

1. Describe what you have implemented
   * 1. **Engineering Controls**

We have reviewed our tasks - the following suggested controls have been evaluated:

1. Physical barriers to prevent spread; – i.e. workstation barrier i.e. sneeze guards for cashiers
2. Isolation of tasks
3. Employee to employee contact reduced by spreading out workstations
4. Ventilation patterns and air change rates
5. Other

The Engineering Controls that this company has implemented are:

* + - 1. Describe what you have implemented
    1. **Administrative Controls**

It is believed that Administrative Controls / Work Practice Controls can be very effective in preventing the spread of COVID-19. We have reviewed our tasks and the following Administrative Controls have been evaluated:

* + - 1. Training
      2. Behavior Modification - Social distancing of 6 feet apart. –
* Personal Cleanliness: Hand washing
* Require employees to wipe down their area after use
  + - 1. Work Surface Cleanliness
* Wipe down surfaces such as door push bars, shopping carts, points of sale machines, chairs in waiting areas, and other areas that customers, visitors, or workers frequently touch.
  + - 1. Employee self-monitoring - stay home if feeling ill
      2. Temperature testing
      3. Reducing the number of people riding in a vehicle to 2
      4. Staggered work shifts, break times to reduce employee and public contact
      5. Limit staff travel between multiple sites.
      6. Implement a safe process to receive supplies and deliveries.

The Administrative Controls that this company has implemented are:

1. Describe what you have implemented

**D. Personal Protective Equipment**

**General Information:** what is and what is not considered PPE

Things that are PPE:

Gloves: various gloves protect against varying hazards, most commonly, medical grade Nitrile or latex gloves are used to protect against pathogenic hazards

Body Protection: Most often varying forms of protective suits are worn to protect from pathogenic hazards. In the case of facilities with direct contact of known or suspected COVID-19 infectious subjects, Tyvek, full body suits can be worn.

Eye/face protection: Eye protection should also be worn for those involved in the direct contact of known or suspected COVID-19 infectious subjects. Eye protection should provide side protection at the least.

Face shields make excellent protection, especially when used in conjunction with eye protection.

Respirators - are tight fitting and considered personal protective equipment.

If N95 masks are used voluntarily, there is no need to have a fit test conducted. If respirators are required in a workplace, a fit test must be completed, and the employer needs a full and detailed protection program. Respirators must be used if involved in medical procedures when exposed to aerosolized virus (intubating, treatment of coughing, etc.) (See Appendix D of the respiratory standard at the conclusion of this document – Attachment 2).

Face Masks (Cloth): Often homemade, but not considered PPE, have been determined to be helpful in protecting others from coughing, sneezing or spraying droplets when talking.

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

**Mandatory Requirements**

**The following are mandatory requirements (to be completed based on specific industry and location guidelines):**

**Mandatory Requirement:** Employees must wear face coverings over their nose and mouth when in the presence of others. In the case of retail cashiers, a translucent shield or “sneeze guard” is acceptable in lieu of a mask.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement**: All employees must observe strict social distancing of 6 feet while on the job, unless noted, and should refrain from touching their faces.

No congregation of employees is allowed. All common areas, unless excepted below, such as break rooms and cafeterias, but excluding restrooms, are closed.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** Break Room Conditions

If possible, access to common areas, break or lunch rooms should be closed or controlled. If the nature of an employer’s work or the work area does not allow employees to safely consume meals in the workspace, an employer may designate a common area or room where meals may be safely consumed provided all conditions are met.

* The employer shall limit occupancy of designated common area or room so that occupants maintain strict social distancing of no less than 6 feet per individual.
* The employer shall enforce the occupancy limit.
* Hand washing facilities and/or hand sanitizer shall be immediately available at entrances of designated common area or room.
* Employees shall be required to wipe down their area prior to leaving -or there shall be cleaning of the area at regular intervals throughout the day.
* At the entrances of the designated common area or room the employer shall clearly post the policy limiting the occupancy of the space, and the minimum social distancing, hand washing/hand sanitizing and space cleaning requirements

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** When working inside, open doors and windows to promote air flow to the greatest extent possible and limit the number of people occupying a single indoor space.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** No more than 2 people shall occupy one vehicle when conducting work, and shall wear face coverings when riding together

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** Employees must wear face coverings over their nose and mouth when in the presence of others. In the case of retail cashiers, a translucent shield or “sneeze guard” is acceptable in lieu of a mask.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:**  All common spaces and equipment, including bathrooms, frequently touched surfaces and doors, tools and equipment, and vehicles must be cleaned and disinfected at the beginning, middle and end of each shift and, when possible, prior to transfer from one person to another. <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

We have accomplished this by the following housekeeping procedures.

**Supplies:** List where, what, check availability

**Outside Vendor:** if appropriate

**Schedule:** You describe the schedule/frequency

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** Employees must have easy and frequent access to soap and water or hand sanitizer during duration of work, and handwashing or hand sanitization is required frequently including before entering, and leaving, job sites.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** Businesses shall ask Customers, and the public in general, to wear face coverings any time they are interacting with others from outside their household.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** Signs must be posted at all entrances clearly indicating that no one may enter if they have symptoms of respiratory illness.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** To the extent feasible, prior to the commencement of each work shift, prescreening or survey, including temperature checks shall be required to verify each employee has no symptoms of COVID-19. Symptoms include;

* Cough
* Shortness of breath or difficulty breathing
* Fever ( >100.0oF)
* Chills
* Repeated shaking with chills
* Muscle pain
* Headache
* Sore throat
* New loss of taste or smell

*Prior to the commencement of each work shift, pre-screening, including temperature checks and health survey shall be required to verify each employee has no symptoms of respiratory illness (fever, cough, and/or shortness of breath).*

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Mandatory Requirement:** Employees shall not report to, or be allowed to remain at, work or job site if sick or symptomatic (with fever, cough, and/or shortness of breath).

* Non-symptomatic COVID-19 positive workers are not allowed on site and any worker(s) who have contact with a worker or any other person who is diagnosed with COVID-19 are required to quarantine for 14 days.

We have accomplished this by the following practices.

The person responsible researching and accomplishing this is: NAME OF PERSON

**Employee Training**

All employees, including those already working (except healthcare workers, first responders, and others already trained in infection control, personal protective/universal precautions) must complete training by \_\_\_\_\_, 2020.

We have been given the option of using a different program that meets or exceeds [STATE] OSHA’s.

We have chosen to use the following training:

NAME OF PERSON will either train, or arrange for training, in the required elements of the [STATE] OSHA COVID-19 requirements. Training will be provided at no cost to the employee and during working hours.

Describe what training you have provided: See Attachment 1.

**Training Documentation:**

Documentation must include the name of the employee, date of training, summary of training and the name of the trainer/s. We maintain our training records for at least (3) years or for the duration of the employment, whichever is longer.

Training records required by the [STATE] OSHA standard are made available to employees, employee representatives, or to [STATE] OSHA representatives for examination and copying.

**Recording COVID-19 Illnesses in the Workplace:**

OSHA recordkeeping requirements (29 CFR Part 1904) mandate covered employer record certain injuries and illnesses on the OSHA 300 log.

COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are true:

* 1. The case is a confirmed case of COVID-19 (see CDC information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19):
  2. The Case is work-related (as defined by 29 CFR 1904.5) and
  3. The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (e.g. medical treatment beyond first aid, days away from work).

Additional information can be found at OSHA’s Enforcement Guidance for Recording Case of COVID-19.

**Medical Records**

Medical records shall be maintained for at least the duration of employment plus 30 years.

If **YOUR COMPANY NAME** ceases to do business and there is no successor employer to receive and retain the records for the prescribed period, the employer shall notify the Director of NIOSH, US Department of Health and Human Services, at least three months prior to their disposal and transmit them to the Director, if required by the Director to do so, within that three month period.

Issue Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Reissue Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature of Safety Manager: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature of Company Executive: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# **TRAINING PROGRAM Attachment 1**

Our Training Program includes the following elements (at a minimum)

An explanation of the modes of transmission of COVID-19

A general explanation of the symptoms of COVID -19

An explanation of the modes of transmission of COVID -19

An explanation of Your Company Name exposure Control Plan and the means by which employees can get a copy of the plan

Instruction on how to properly put on and take off gloves, N95’s and cloth masks

An explanation on the basis for the selection of PPE

Information of how to contact someone if the employee has a temperature or does not feel well

What to do if the employee traveled to high risk areas or have been exposed to possible COVID-19 cases

Hand washing techniques

Cleaning schedules

Pre-screening before work

**Attachment 2**

**Appendix D of Respirator Standard CFR 1910.134**

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| **Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard**  Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.  You should do the following:  1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.  2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.  3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.  4. Keep track of your respirator so that you do not mistakenly use someone else's respirator. |

***Note – requirements are continually changing. This document was prepared 6/10/2020. Changes will occur that are not reflected in this document.***

See: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

[URL to state-specific resources]