

# Reopening/COVID Resiliency Plan for Businesses with Workers of Lower to Medium Exposure Risk to SARS-CoV-2

*Guidance on Preparing Workplaces for COVID-19, OSHA 3990-03 2020 and CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*

This document is intended to be a guide, or template, for the generation of a Business Reopening Plan that should be followed to ensure that Occupational Safety and Health Administration as well as Centers for Disease Control requirements and suggestions are met. At all times the controlling documents are the latest versions of *Guidance on Preparing Workplaces for COVID-19, OSHA 3990-03 2020 and CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*, and supersede any recommendation issued herein.

Following this template will both streamline the reopening planning process, as well as ensure consistency of plans among economic sectors such as agriculture, childcare, k-21 and post-secondary education, manufacturing, retail, services, and tourism. All of which are generally considered Lower to Medium Exposure Risk businesses. This template can be used for the purpose of developing plans among business sectors as well as specific company/organization plans.

This guidance in this document is designed for lower to medium exposure risk workers (see *Guidance on Preparing Workplaces for COVID-19, OSHA 3990-03 2020 for further details on all risk levels and CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*).

This guide is not intended to be definitive, but to address situations where **lower to medium exposure risk** workers are not within 6 feet of someone known, or suspected to have, SARS-CoV-2, and not performing body fluid aerosol-generating procedures.

## **Definition of risk classification associated with jobs:**

1. **Lower Exposure Risk** - those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers
  - a. Manufacturing
  - b. Agriculture

2. **Medium Exposure Risk** - those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients, i.e. general public
  - a. Restaurants/Retail
  - b. K-12/Post-secondary education/Workforce Development
  - c. Tourism/Hospitality/Attractions
  - d. Services
    - i. Office Based
      1. Financial institutions/Wealth Management/Accounting
    - ii. On-site
      1. Contractors/Plumbers/Electricians/other
  - e. Childcare

3. **High or Very High Exposure Risk** - jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:

- a. Healthcare workers including laboratory personnel
- b. Medical transport
- c. Morgue and Mortuary workers

(In workplaces where workers have high or very high exposure risk, employers should follow the guidance in *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020)

# Sector & Business Template

## How Use the Template

The template serves two purposes:

1. The template can be used to develop business sector templates. A sector can be convened bringing together a group of peers in that sector to review the template. The guidance of OSHA/CDC has been put into a question format to help prompt discussion within the sector group. The sector group can then provide input in the form of their workplace practices, suggestions, innovations and best practices.
2. The template can be used by a business to compile a plan specific to their organization. The guidance of OSHA/CDC has been put into a question format to help prompt the business as they compile their plan. Some questions can be turned into statements (ex. Workers are encouraged to stay home if they are sick). Some questions in the template will require the business to develop policies, practices of guidelines consistent with OSHA & the CDC.

## Section A

Section A includes Reopening/COVID Resiliency plan components. This section is designed so that plan components can be developed and recommended by economic sector groups. These sector groups can then aggregate their feedback in the template. The template will then be used to provide guidance out to businesses within the sector. Some of the plan components are more general and speak to specific items that each business/organization should include in their plans. *(green text items are the sections where sector groups should focus their input in developing recommendations. The blue text items are company specific questions that the businesses/organizations should address within their specific plans)*

1. Develop an Infectious Disease Preparedness and Response Plan
2. Implement basic infection prevention measures
3. Develop policies and procedures for prompt identification and isolation of sick employees
4. Develop, implement, and communicate about workplace flexibilities and protections
5. Implement workplace controls
6. Continued adherence to all existing OSHA standards

## Section B

Section B includes additional plan components to integrate at the individual business/organizational level.

## Section C

Section C includes links to additional resources to assist in plan development.

## Section A

### Basic Steps to Reduce Risk of Worker and Customer Exposure

The following section describes basic steps that every employer can take to reduce the risk of worker exposure to SARS-CoV-2, the virus that causes COVID-19, in their workplace.

#### 1. Develop an Infectious Disease Preparedness and Response Plan.

- a. Have you determined and addressed the level of risk associated with various worksites and job tasks?
  - i. What are your business/organization's sources of SARS-CoV-2 exposure?
    1. *For example General public, customers, co-workers, high risk individuals (those who travel to infected areas, healthcare workers, etc.)*
  - ii. What are your employee's non-occupational risk factors at home and in community?
  - iii. Among your workforce, which workers have risk factors?
    1. *Note: take into consideration those of age > 65, chronic medical conditions, etc.*
      - a. *Asthma or lung disease*
      - b. *Heart conditions*
      - c. *Immunocompromised*
      - d. *Severely obese (BMI>40)*
      - e. *Diabetics*
      - f. *Those with liver or kidney disease undergoing dialysis*
- b. What controls do you have in place that are necessary to address those risks?
  - i. *Note: Consider minimizing face-to-face contact between these employees or assign work tasks that allow them to maintain a distance of six feet from other workers, customers and visitors, or to telework if possible*
- c. What is your procedure to address a suspected infection?
  - i. How will you handle employee isolation if infection is suspected while in the workplace?
    1. *Note: You will want to open up communication with Public Health officials.*

Sector Input:

- d. Do you have an outbreak contingency plan?
  - i. How will you manage increased absenteeism?

Sector Input:
  - ii. Does you plan address social distancing, staggered work shifts, downsizing operations, other exposure-reducing measures?

Sector Input:

iii. Do you have a plan for conducting essential operations with reduced workforce?

1. *Note: Consider cross training of workforce*

Sector Input:

iv. How will you manage your business while experience interrupted supply chains?

Sector Input:

## 2. Implement basic infection prevention measures.

a. Do you have the resources you need to promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands?

i. *Note: If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol*

b. Are you encouraging workers to stay home if they are sick?

c. Are you encouraging respiratory etiquette, including covering coughs and sneezes?

d. Are you providing customers and the public with tissues and trash receptacles?

e. Have you developed policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees and between employees and others if state and local health authorities recommend the use of social distancing strategies?

Sector Input:

f. Are you discouraging workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible?

g. Have you developed and are you maintaining housekeeping practices, including routine cleaning and disinfecting of all frequently touched surfaces, equipment, and other elements of the work environment. When choosing cleaning chemicals, employers should consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens?

Sector Input:

h. Are you providing tissues and no-touch disposal receptacles?

i. Are you providing soap and water in the workplace. If soap and water are not readily available, use alcohol-based hand sanitizer that is at least 60% alcohol? Note that if hands are visibly dirty, soap and water should be chosen over hand sanitizer. Ensure that adequate supplies are maintained.

j. Are you placing hand sanitizers in multiple locations to encourage hand hygiene?

k. Are you placing posters that encourage hand hygiene to help stop the spread at the entrance to your workplace and in other workplace areas where they are likely to be seen?

l. Are you discouraging handshaking?

i. *Note: Encourage the use of other noncontact methods of greeting.*

- m. Are you directing employees to visit the coughing and sneezing etiquette and clean hands webpage for more information?  
([https://www.cdc.gov/healthywater/hygiene/etiquette/coughing\\_sneezing.html](https://www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html))

**3. Develop policies and procedures for prompt identification and isolation of sick employees.**

- a. What are you doing to inform and encourage employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure?
- b. Have you developed policies and procedures for employees to report when they are sick or experiencing symptoms of COVID-19?

Sector Input:

- c. Have you developed policies and procedures for immediately isolating people who have signs and/or symptoms of COVID-19, and train workers to implement them?
  - i. Do those policies and procedures move potentially infectious people to a location away from workers, customers, and other visitors?

Sector Input:

- ii. Do you have an isolation rooms, designated areas with closable doors may serve as isolation rooms until potentially sick people can be removed from the worksite?

Sector Input:

- d. Do you have a plan to address if an employee is confirmed to have COVID-19 infection, how you will inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA) ([https://www.eeoc.gov/facts/pandemic\\_flu.html](https://www.eeoc.gov/facts/pandemic_flu.html))?

Sector Input:

- i. Do you have instructions for fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure (<https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>)?

Sector Input:

- e. When a sick employee is suspected or confirmed to have COVID-19 do you have a disinfection plan?
  - i. Are you following the CDC cleaning and disinfection recommendations? (<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>)
- f. Have you communicated to your employees that if they are COVID-19 infected that they should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments?

- g. Have you informed your employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC recommended precautions?

**4. Develop, implement, and communicate about workplace flexibilities and protections.**

- a. Are you actively encouraging sick employees to stay home?
  - i. *Note: You may not want to require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness or to return to work, as healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way*
- b. Have you reviewed your sick leave policies to make sure they are flexible and consistent with public health guidance and that employees are aware of these policies?

Sector Input:

- c. Have you talked with companies that provide your business with contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies?
- d. Have you developed flexible policies that permit employees to stay home to care for a sick family member?
  - i. *Note: Employers should be aware that more employees may need to stay at home to care for sick children or other sick family members than is usual*

Sector Input:

**5. Implement workplace controls.**

- a. Have you implemented engineering controls in the workplace such as those that do not rely upon worker behavior, i.e. isolation of employees from work-place hazards?

Sector Input:

- i. Have you thought of ways to improve air filtration/installed new air filters?

Sector Input:

- ii. Have you thought of ways to increase ventilation rates in the workplace?

Sector Input:

- iii. Have you installed physical barriers (i.e. plastic sneeze guards)?

Sector Input:

- iv. Can your business consider or does it have a drive through window or other solutions for customer service?

Sector Input:

- b. Have you implemented administrative controls which would require action by the worker or employer?
  - i. Are you asking sick workers to stay at home?
  - ii. Are you using virtual communications and telework when feasible?
  - iii. Have you established alternating days or extra shifts to reduce the number of employees in a facility at a given time?

Sector Input:

- iv. Have you discontinued nonessential travel to locations with ongoing COVID-19 outbreaks?
- v. Have you developed an emergency communications plans, including a forum for answering workers' concerns?

Sector Input:

- c. Have you implemented safe work practices such as procedures for safe and proper work?
  - i. Are you providing resources and a work environment that promotes personal hygiene?
    - 1. *For example, provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs containing at least 60 percent alcohol, disinfectants, and disposable towels for workers to clean their work surfaces*
  - ii. Are you requiring regular hand washing or using of alcohol-based hand rubs?
    - 1. *Note: Workers should always wash hands when they are visibly soiled and after removing any PPE.*
  - iii. Have you posted handwashing signs in restrooms?
- d. Are you deploying personal protective equipment?
  - 1. *Note: Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs. The types of PPE required during a COVID-19 outbreak will be based on the risk of being infected with SARS-CoV-2 while working and job tasks that may lead to exposure*

Sector Input:

- ii. In considering your plan are you doing it based upon the hazard to the worker?

Sector Input:



- iii. Are you making sure PPE is properly fitted and periodically refitted, as applicable? (e.g., respirators)

Sector Input:

- iv. Are you making sure PPE is consistently and properly worn when required?

Sector Input:

- 6. Continued adherence to all existing OSHA standards (see: <https://www.osha.gov/>)

## Section B

### Additional Plan Components to Integrate at Individual Company Level

- 1. Conduct an analysis of current capacity and capabilities for disease control and prevention.**
  - a. Have you identified gaps in your businesses necessary workplace controls?
    - i. i.e. table spacing in a restaurant, distance between register and customer, use of rest rooms, breaks and break rooms, other.
  - b. How will you rectify gaps in necessary workplace controls tied to OSHA/CDC requirements?
    - a. What controls have you implemented to address the vulnerable?
      - i. Minimize face-to-face contact between these employees or assign work tasks that allow them to maintain a distance of six feet from other workers, customers and visitors, or to telework if possible.
    - b. What have you done to identify any idiosyncrasies associated with a particular business?
      - i. I.e. Employee travel to and from customer sites, customer visits, cleaning of items frequently handled by customers and/or employees, etc.
- 2. Consider employee child care needs.**
  - a. Do you have a plan for referring employees to child care and or offering assistance in paying for child care?
  - b. Have you talked with companies that provide your business with contract or temporary employees about the importance of child care and families leave and encourage them to develop non-punitive leave policies?
  - c. Have you modified your family leave policies to address child care needs?
  - d. Have you considered ways in which your business can help support your employees in finding and paying for child care?
- 3. Conduct employee training and maintain training documentation.**
  - a. Have you developed and implemented employee training? (ex. cough etiquette, how to use PPE, how to disinfect etc.)
  - b. Do you have a system to track and document employee training?
  - c. Do you have a system to routinely audit continued adherence to this safety plan?

## Section C

### Resources

**View Industry Examples:**

- <https://www.chautauquachamber.org/covid-19-and-the-workplace.html#restart>

**Source Documents:**

- <https://www.osha.gov/Publications/OSHA3990.pdf>
- <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>