**COVID-19 Exposure control plan (ECP)**

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**CONSTRUCTION**

**Sample Program**

Prepared by ESM Solutions, Inc.   
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**INSTRUCTIONS**

1. Review Exposure Control Plan and amend to match your organization’s policies and procedures
2. Finalize the ECP and review with Managers and Supervisors
3. Review COVID-19 Safety Trainings, Forms and Best Practices (and amend to match your organization’s policies and procedures
4. Provide COVID-10 training to all employees and obtain signatures using the attendance form.
5. Maintain signature pages for recordkeeping

**ADDITIONAL RECOMMENDATIONS**

1. Review your Company’s bloodborne pathogens policy
2. Review your Company’s work from home policy
3. Review your Company’s travel policy

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**Exposure Control Plan Overview**

Communicable Diseases, such as COVID-19, spread through respiratory secretions when exhaled or expelled through coughing, sneezing, etc., and other infectious diseases which are spread through body contact, contact with infected body fluids, or through other vectors and means.

The objective of this plan is to outline the requirements and procedures to reduce the potential for exposure to COVID-19 by developing and implementing effective controls and procedures for employees.

**Policy**

It is the policy of **Company Name** to provide a safe, healthy and secure workplace for all employees by implementing an effective Exposure Control Plan (ECP). Our ECP applies to employees that work in environments where their job tasks have the potential for communicable diseases exposures.

1. **Responsibilities**

**Safety Manager**

* Assists with developing a written program, which complies with Cal/OSHA and CDC standards
* Assists with providing training to all employees on the risks and control procedures of our ECP, including how to recognize communicable disease symptoms and proper response when they appear
* Identifies tasks and work environments where potential communicable disease exposures exist
* Identifies all employees, vendors, and contractors who are required to work on tasks or in areas where there is an increased risk of exposure to communicable diseases
* Ensures effective processes and procedures are developed, implemented, and maintained in accordance with our ECP
* Shall be knowledgeable in infection control principles as they apply specifically to our facilities, jobsites, services, and/or operations
* Works with managers, supervisors and employees to ensure this program is working effectively
* Stays apprised of public exposures and develops action plans and training to mitigate potential exposure

**Department Managers, Supervisors & Leads**

* Ensures that the requirements in this ECP are implemented
* Ensures that affected personnel are trained and follow control procedures outlined in this Plan
* Works with the Safety Manager to provide feedback on the implementation of this program and to ensure this program is working properly within their department

**Affected Employees**

* Complies with **Company Name** Exposure Control Plan
* Attends and understands training on communicable diseases

1. **Worker Exposure Classification**

The level of exposure will vary by job and department. **Company Name** has determined this risk level in the following categories:

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk Category** | **Job/Department** | **Associated Risks** | **PPE required** |
| **Very High**  (jobs with high potential to exposure to known exposure sources during medical processes) |  |  |  |
| **High**  (jobs with high potential to exposure to known exposure sources) |  |  |  |
| **Medium**  (jobs that require close contact to general public and potentially infected people) |  |  |  |
| **Low**  (jobs that have minimal occupational contact with the public and coworkers) |  |  |  |

1. **Site Specific Procedures**

**Company Name** will reduce the risk of transmission of COVID-19 on our jobsites by utilizing the following strategies, as needed by site. These procedures may include:

* Reduced number of individuals on each the site to essential staff to complete the work
* Temporary spaces (e.g. site/job trailers) will be cleaned and disinfected daily
* Anyone who is symptomatic is prohibited from the worksite
  + We will work with our health providers for support and guidance
* Reduce tasks requiring large amounts of people to be in one area and design work to reduce or eliminate trade stacking in the same area
  + Consider limiting meetings to 10 people or less
* Ensure tailgate trainings have adequate spacing and only have one person note who is in attendance
* PPE: for close contact activities that cannot adjust for physical distancing consider enhanced PPE or provide a face shield with a face covering
* Project teams shall clean and disinfect their shared workstations and equipment after use
* Eliminate non-essential visits, such as job tours, vendor demos, etc.
  + Maintain a daily approved visitor log, which should include the date, time, and contact information of the visitor
* Stagger shifts and other trades to isolate and compartmentalize staff. This will allow protection of others if a breakout occurs and reduces / limits the number of people who are exposed.
  + Having the same teams work together or travel together can limit the reach of a potential outbreak
* Consider a 4-day work week to allow for 72 hours of downtime at the project, which will allow for limited exposure to 4 days instead of 5 days
  + CDC and recent studies have shown COVID-19 can stay active up to 3 days on surfaces
* Stop employees from randomly walking floors, between floors, or buildings to reduce cross-contamination
* For complex and large projects, we may consider color code (stickers) on hard hats and restrict access to only the correct color for each building or space
* Provide several hand washing stations with soap and water, portable wash stations and/or hand sanitizer in vehicles and workstations
* Modify break areas to allow for social distancing
  + Stagger breaks to reduce people in break areas
  + Picnic tables should be marked with “X”s to stop people from sitting close to each other
  + Breakrooms should have chairs removed to stop any chance of gathering
  + Janitorial staff should be disinfecting eating areas hourly
* Eliminate sharing personal hand tools and large shared tools shall be cleaned before and after use
* Encourage staff to wash clothes daily and face coverings daily on the warmest setting possible
* Monitor employees’ wellness. If they are not feeling well, stay home

1. **Transmission Control Procedures**

**Company Name** will reduce the risk of transmission of COVID-19, to the extent possible, during the period an employee presenting an exposure risk or that requires isolation at our site or facility. These procedures may include:

* If a positive COVID-19 case amongst the workforce is identified, quickly disinfect spaces the worker was at and complete contact tracing for anyone that may have come in contact with the employee
* Contact tracing and sharing of employee information should be done under the guidance of Human Resources due to privacy requirements of HIPAA and/or ADA
* Employee who tests positive:
  + The employee shall be isolated to the area they are in currently
  + Any individuals working with the employee shall also be isolated and all parties will follow social distancing rules
  + The general contractor/client shall be notified
  + Remove the employee who tested positive for a minimum of 14 days
  + Follow primary care physician (PCP) instructions
  + Follow CDC and health care guidance
  + Follow CDC return-to-work protocol in conjunction with HR return-to-work process if applicable
  + Employees who are ill with non-COVID-19 related symptoms (fever, cough, shortness of breath), shall be sent home for a minimum of 72 hours
    - Returning to work after 72-hours symptom free without aid of medication
  + Cleaning and disinfecting should be done immediately by trained personnel and they must wear appropriate PPE, including face masks and dispose of gloves after use and wash hands and face when completed
* Employer Response to positive case:
  + Immediately isolate, clean/disinfect and contact trace the movement of the employee
  + Trace 72 hours for cleaning of locations employee worked or in contact with
  + Trace 48 hours prior to onset of symptoms for direct contact personnel had contact with the affected employee
* If it has been more than 7 days since the person with suspected/confirmed COVID-19 visited or used the facility, additional cleaning and disinfection is not necessary

1. **Temperature Screening and Testing**

To mitigate the potential for spread of the virus, **Company Name** will implement temperature screening and blood testing, to the extent possible, during the crisis period. These procedures may include:

* Home Assessment
  + Employees are encouraged to self-assess at home using the daily health check form, prior to going to the jobsite. If an employee is experiencing any potential COVID-19 related symptoms, they are required to stay home and notify their superior and/or Human Resources
  + Employees, who monitor their temperature at home, should update their supervisor if they have a temperature exceeding 100.4 degrees Fahrenheit
* Jobsite assessment
  + Screening and Temperature Check Tips for Employees using a touchless thermometer at each jobsite
  + Employees may be required to complete a health assessment prior to being allowed on the jobsite
    - Per the medical questionnaire, any employee who answers “Yes” to any of the questions will be sent to the secondary evaluation area, where the designated onsite safety officer (if available) will assess and determine if they are allowed on the jobsite.
    - Any employee who has a temperature that exceeds 100.4 degrees Fahrenheit will not be able to access the jobsite until their temperature has broken for a minimum of 72 hours without medication
  + Example Medical Questionnaire.
    - Have you, or a person you have been in close contact with, been diagnosed with COVID-19 within the last 14 days? (close contact is 6 feet or less for more than 10 minutes.)
    - Have you, or a person you have been in close contact with, experienced any cold or flu-like symptoms in the last 72 hours (to include fever, shortness of breath, cough, sore throat, or difficulty breathing)?
    - Have you traveled internationally or another hot spot (e.g., New York) in the last 14 days?

1. **Jobsite visitors**

To mitigate additional exposures to jobsite personnel, visitors and non-essential personnel are prohibited from the jobsite, unless prior approval is granted. Authorized visitors must adhere to jobsite protocols:

* Visitors must adhere to social distancing protocols
* Use a face covering when entering the jobsite and inspecting or meeting with workers
* No handshake greetings
* Do not share clipboards, but rather use a white board to demonstrate the concept in the field
* If they are symptomatic, they are prohibited from the jobsite
* Increased use of virtual technology for project tracking and updates to reduce visitors shall be used when available

1. **Decontamination Procedures**

Contaminated waste shall be handled, stored and disposed of all in accordance with all applicable federal, state and local regulations.

"Contaminated Waste" pertaining to COVID-10 means waste containing infectious respiratory secretions (saliva) from coughing or sneezing.

“Cleaning”refers to the removal of dirt and impurities, including germs, from surfaces. Cleaning alone does not kill germs. But by removing the germs, it decreases their number and therefore any risk of spreading infection.

**To discard contaminated waste, place all used gloves, facemasks, and other disposable items in a bag that can be tied closed before placed in another bag with other wastes. Place this bag in a rigid trash container, like a trash can with a lid or dumpster.**

**Hard Surfaces:**

* If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
* For disinfection, most common EPA-registered household disinfectants should be effective.
  + A list of products that are EPA-approved for use against the virus that causes COVID-19 is available on the CDC & EPA websites (<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>).
  + Follow the manufacturer’s instructions for all cleaning and disinfection products for concentration, application method and contact time, etc.
  + Additionally, diluted household bleach solutions (at least 1000ppm sodium hypochlorite) can be used if appropriate for the surface. Follow manufacturer’s instructions for application, ensuring a contact time of at least 1 minute, and allowing proper ventilation during and after application. Check to ensure the product is not past its expiration date.
  + Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.
    - Prepare a bleach solution by mixing:
      * 5 tablespoons (1/3 cup) bleach per gallon of water or
      * 4 teaspoons bleach per quart of water

**Soft (Porous) Surfaces**

* For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces. After cleaning:
  + If the items can be laundered, launder items in accordance with the manufacturer’s instructions using the warmest appropriate water setting for the items and then dry items completely.
    - Otherwise, use products that are EPA-approved for use against the virus that causes COVID-19 and that are suitable for porous surfaces

**Electronics**

* For electronics such as tablets, touch screens, keyboards, remote controls, and ATM machines, remove visible contamination if present
  + Follow the manufacturer’s instructions for all cleaning and disinfection products.
  + Consider use of wipeable covers for electronics
  + If no manufacturer guidance is available, consider the use of alcohol-based wipes or sprays containing at least 70% alcohol to disinfect touch screens. Dry surfaces thoroughly to avoid pooling of liquids

**Linens, Clothing, and Other Items That Go in the Laundry**

* In order to minimize the possibility of dispersing virus through the air, do not shake dirty laundry
* Wash items as appropriate in accordance with the manufacturer’s instructions. If possible, launder items using the warmest appropriate water setting for the items and dry items completely. Dirty laundry that has been in contact with an ill person can be washed with other people’s items
* Clean and disinfect hampers or other carts for transporting laundry according to guidance above for hard or soft surfaces

**Personal Protective Equipment**

* **The risk of exposure to cleaning staff is inherently low**
* **Cleaning staff should wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash**
  + Gloves and gowns should be compatible with the disinfectant products being used
  + Additional PPE might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash
  + Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area. Be sure to clean hands after removing gloves
  + If gowns are not available, coveralls, aprons or work uniforms can be worn during cleaning and disinfecting. Reusable (washable) clothing should be laundered afterwards.
    - Clean hands after handling dirty laundry
* Gloves should be removed after cleaning a room or area occupied by ill persons.
  + Clean hands immediately after gloves are removed
* Cleaning staff should immediately report breaches in PPE such as a tear in gloves or any other potential exposures to their supervisor
* **Cleaning staff and others should clean hands often, including** immediately after removing gloves and after contact with an ill person, by washing hands with soap and water for 20 seconds.
  + If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains at least 60% alcohol may be used

1. **Health, Housekeeping, and Hygiene Procedures**

**Company Name** shall implement and enforce policies to prevent the spread of illnesses within the organization so as to provide a safe and healthful work environment, and to develop a system for ensuring that employees comply with safe and healthy work practices.

General CDC health hygiene best practices include:

* Employees who have symptoms of acute respiratory illness are recommended to stay home and not come to work until they are free of fever (100.4° +), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines
* Employees should notify their supervisor and stay home if they are sick or to stay at home to take care of a sick relative
* Employees who appear to have acute respiratory illness symptoms (i.e. cough, shortness of breath) upon arrival to work or become sick during the day will be separated from other employees and be sent home immediately
* Sick employees should cover their noses and mouths with a tissue when coughing or sneezing
* Use tissues and no-touch disposal receptacles
* Employees are recommended to clean their hands often with an alcohol-based hand sanitizer that contains at least 60-95% alcohol or wash their hands with soap and water for at least 20 seconds Soap and water should be used preferentially if hands are visibly dirty
* Work policies and “stay at home” policies for employees with respiratory and viral illnesses, flu-like symptoms, and/or with open wounds will be considered
* Maintenance of company facilities and jobsites in a healthy and clean condition to prevent the spread of illnesses, infections, and food borne illnesses

1. **Reporting**

Employees are required to report all potential incidents, including those involving the presence of contaminated waste to their supervisor and/or safety manager immediately.

Additionally, employees that suspect there is a potential exposure to a communicable disease, must report the potential exposure to their supervisor and/or safety manager immediately.

Department Managers and/or the Safety Manager will then determine the appropriate decontamination procedures.

Employees that are sick or have flu-like symptoms are encouraged to stay home and to notify their supervisor of their illness immediately.

1. **Personal Protective Equipment**

**Company Name** shall evaluate, identify, and provide personal protective and other equipment necessary to minimize employee exposure communicable diseases as needed. PPE will depend on the risk factors of each job and department and may consist of:

* Disposable gloves
* Filtering facepieces (N95 masks, surgical masks and/or respirators)
* Face shields
* Googles
* Aprons
* Boots

Additional training and procedures on PPE may be required.

1. **Worksite (office) Controls**

Dependent upon the level of exposure, **Company Name** will implement engineering controls, administrative controls and/or other general safe work practices.

Engineering controls will be designed to isolate employees from work related hazards and may include:

* Physical barriers to minimize potential spread
* High efficiency air filters

Administrative controls will be a modification to procedures in order to minimize exposures to the hazard and may consist of:

* Requiring sick workers to say at home
* Replacing in-person meetings with virtual meetings
* Alternate workdays/shifts to reduce the number of employees in the facility
* Additional training for donning / doffing PPE
* Increase space between workers to minimize potential spread
* Increased sanitation frequency in common areas (break rooms, bathrooms, conference rooms, etc.)

Depending on the hazards, additional safe work practices may be implemented such as:

* Increased health and hygiene requirements
  + handwashing frequency
  + hand sanitizer stations
  + Uniform/PPE washing
* Increased frequency of sanitizing workstations

1. **Training**

All employees with the potential for occupational exposure will be provided training on **Company Name‘s** Exposure Control Plan.

* Training shall be provided at the time of initial assignment to tasks where occupational exposure may take place and at least annually thereafter
* For existing employees, training shall be provided within 90 days (3 months) of implementation of this ECP and at least annually thereafter
* Additional training shall be provided when there are changes in the workplace or when there are changes in procedures that could affect worker exposure

1. **Recordkeeping**

Company Name will maintain training records, medical evaluation records, vaccination records, records of exposure incidents, injury/infection logs, and records of inspection, testing, and maintenance of non-disposable engineering controls.

All records prepared in association with this program shall be managed in accordance with our Injury & Illness Prevention Program.