**Sample Workplace COVID-19 Preparedness Plan\***

**(current as of May 3, 2020)**

**Introduction**

Company Name (hereinafter the “Company”) takes the health and safety of our employees very seriously.  With the spread of the coronavirus or “COVID-19,” we must remain vigilant in mitigating the outbreak.  We have been deemed [*essential or nonessential*] as declared by the federal or state government during this declared National Emergency.  In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout the Company.  The Company has also identified a team of employees who will implement this plan as well as monitor local, state and the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available.

This Plan is based on information available from the State of \_\_\_, the CDC and OSHA at the time of its development and is subject to change based on further information provided by these agencies and public officials.  The Company may also amend this Plan based on operational needs.

**How is COVID-19 Spread?**

COVID-19, like other viruses, can spread between people.  Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze.  According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet).  Person-to-person spread is thought to occur mainly via respiratory droplets produced when an infected person coughs or sneezes, like influenza and other respiratory pathogens.  These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.  It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes. Thus far, it is thought to remain the longest on stainless steel.

[*In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties.  Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus.]*

Depending on the work setting, we may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures. There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

**Responsibilities of Manager and Supervisors**

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees.  Managers and supervisors must set a good example by following this Plan at all times.  This involves practicing good personal hygiene and safety practices to prevent the spread of the virus.  Managers and supervisors must encourage this same behavior from all employees.

**Responsibilities of Employees**

The Company is asking each of our employees to help with our prevention efforts while at work.  In order to minimize the spread of COVID-19 at work, everyone must play their part.  As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices, which all employees must follow.  In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below.  If you have a specific question about this Plan or COVID-19, please ask your manager or supervisor or please contact Human Resources.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

* Frequently wash your hands with soap and water for at least 20 seconds.  When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
* Avoid touching your eyes, nose, or mouth with unwashed hands.
* Follow appropriate respiratory etiquette, which includes covering your mouth and nose for coughs and sneezes.
* Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

* Cough;
* Fever;
* Shortness of breath, difficulty breathing; and
* Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK. Please call your supervisor and healthcare provider as soon as possible.  Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

**Business Protection Measures**

The Company has instituted the following protective measures in all offices and job sites.

1. *General Safety Policies and Rules*

* Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the office/jobsite and return home.
* Meetings will be by telephone, if possible.  If meetings are conducted in-person, the meetings will avoid gathering in groups of more than 10 people and participants must remain at least 6 feet apart. Everyone at an in-person meeting must wear a [*company supplied*] mask.
* Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors) to increase personal space to at least 6 feet, where possible.
* Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to fewer than 10 people. [*There will be no common coffee makers, water coolers or microwaves.*]
* The Company will provide cleaning supplies for your office, along with alcohol-based hand sanitizers and/or wipes.
* Employees should limit the use of co-workers’ equipment.  To the extent tools must be shared, the Company will provide alcohol-based wipes to clean tools before and after use.  When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
* The Company will divide employees into dedicated shifts.  If there is a legitimate reason for an employee to change shifts, the Company will have sole discretion in making that change.
* Employees are encouraged to minimize ride-sharing.  While in vehicles, employees must ensure adequate ventilation.
* In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

**Visitors**

The number of visitors to the job site, including a worksite trailer or office, will be limited to only those necessary for the work. All visitors will be screened for symptoms in advance of arriving on the job site.  If the visitor answers “yes” to any of the following questions, he/she must not be permitted to access the jobsite:

* Have you been confirmed positive for COVID-19?
* Are you currently experiencing, or have you recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
* Have you been in close contact with anyone who has been confirmed positive for COVID-19?
* Have you been in close contact with anyone who has traveled and is also exhibiting acute respiratory illness symptoms?

Deliveries will be permitted but should be coordinated with minimal contact and cleaning protocols.  Delivery personnel should remain in their vehicles if at all possible.

**Personal Protective Equipment and Work Practice Controls**

In addition to regular personal protective equipment (“PPE”) for workers engaged in various tasks which require protective wear, the Company will also provide:

* Gloves:  Employees should avoid sharing gloves.
* Masks: [Will they come from the company or not. Identify sanitation process for masks]
* Hand Sanitizer
* [*anything else – such as thermometer*]

The Company has instituted regular housekeeping practices, which include cleaning and disinfecting frequently equipment and other elements of the work environment, where possible.  Employees should regularly do the same in their assigned work areas.

Break/lunchroom areas will be cleaned multiple times per day [identify this].  Employees performing cleaning will be issued proper PPE, such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.

Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves. Bathrooms will be cleaned twice per day [*who will clean and what is the process*].  The Company will ensure that hand sanitizer dispensers are always filled.  Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.

If an employee tests positive or has COVID-19 symptoms, there will be a complete cleaning of the area the individual may have contacted and it will do so before employees can access that workspace again.

If employees observe that PPE or hand sanitizer requires restocking or believe an area needs cleaning or disinfecting, they should notify their manager as soon as possible.

**Cleaning Procedures**

A team will be created to ensure that the following surfaces are cleaned and sanitized according to CDC recommendations (available here: <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>

* All doorknobs and handles (on every floor);
* Counters and desks in the front offices;
* Table(s) and counters in kitchens, dining rooms, and break rooms. Include side arms of common room chairs;
* All refrigerators, including handles;
* Microwave handles and buttons;
* Tops and sides of all trash cans;
* Copy machines;
* Keyboards and mice in the front offices;
* Handrails outside in the front and back of the building;
* All phones in the office and available to clients (headsets and keys);
* Bathroom sinks and faucets; and
* Toilet seats and handles

**If an Employee Exhibits COVID-19 Symptoms**

If an employee exhibits symptoms of COVID-19, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., Tylenol, ibuprofen, or cough suppressants).  The Company will similarly require an employee who reports to work with symptoms to return home until he or she is symptom free for 72 hours (3 full days).  To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

**If an Employee Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work.  Employees who test positive and are symptom free may return to work when at least seven (7) days have passed since the date of his or her first positive test and have not had a subsequent illness.  Employees who test positive and are directed to care for themselves at home may return to work when:

1. At least 72 hours (3 full days) have passed since recovery (recovery is defined as: (a) resolution of fever without the use of fever-reducing medications and (b) improvement in respiratory symptoms (e.g., cough, shortness of breath); and
2. At least seven (7) days have passed since symptoms first appeared.  Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers.  The Company will require an employee to provide documentation clearing his or her return to work.

**If an Employee Has Close Contact with Someone Who Has Tested Positive for COVID-19**

Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual.  Close contact is defined as six (6) feet for a prolonged period of time.

If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee in the prior 14 days and may direct those individuals who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee.  If applicable, the Company will also notify any contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact.

**OSHA Recordkeeping**

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA’s recordkeeping rule. If an employee has a confirmed case of COVID-19, the Company will conduct an assessment of any workplace exposures to determine if the case is work-related.  Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions.  One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside of the work environment.  Thus, if an employee develops COVID-19 solely from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

The Company’s assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread.  Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident.

**Confidentiality**

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances.  When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others.  The Company reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. The Company also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

**Communications and Training of Managers and Workers Necessary to Implement this Plan**

The Company will ensure that messaging across all platforms (including social media, emails, and communications with vendors/guests, are aligned and timely. We promise to react quickly, sincerely and transparently when we are made aware of a COVID-19 situation that employees should be made aware of in order to ensure their health and safety.

[*Here you can prepare sample templates regarding notice of a guest/vendor or employee that has tested positive or is presumed positive. Communications are never more important than during a crisis. Do whatever it takes to help your team understand that there is no shame in testing positive, get full buy-in from your team around hygiene and health protocols, have signage everywhere to remind people how to follow the CDC guidelines and find morale-boosting gestures you can do for your employees*]

[*Prepare a training for manager/supervisors on protocol for cleaning, guests, employees and when there is a positive or presumed positive*]

**Posting**

Educational posters will be posted in multiple locations around the office, including the following:

* COVID-19 flyer
* Hand washing instructions
* Sanitation procedures
* CDC Guidelines

**General Questions**

Given the fast-developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis.  If you have any questions concerning this Plan, please contact          [Title of Designated Individual]                  .

\* Please check your individual state law requirements and be sure to look at both the state government website for continuing and updated information as well as your local/state Department of Health.

*Please note that these are fast-moving times and the information provided is only accurate as of the day posted (May 3, 2020). The information provided does not, and is not intended to, constitute legal advice; instead, all information is prepared and provided for general informational purposes only.*

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