# Sample Written Program

For COVID-19 Management and Control

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# NDOL-Onsite Safety and Health Consultation Program

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# HOW TO USE THIS TEMPLATE

* Fill in the blanks and tables marked in red with your company’s own procedures.
* Your COVID-19 Prevention Program must be specific to your business and accurately describe what you do at your workplace.
* Blue underlined text throughout this template contains hyperlinks to further resources. Review and print any necessary resources to help with your program.

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# PURPOSE

The purpose of this COVID-19 program is to ensure the protection of employees at this establishment by providing information and training on the hazards associated with SARS-CoV-2 exposure. Training will be provided upon initial assignment to duties and repeated or augmented whenever new information is readily available.

[Company Name] is committed to protecting our employees and preventing the spread of COVID-19 at our workplace. We encourage employees to share information about potential COVID-19 hazards at our workplace and assist in evaluating these hazards. We will investigate all workplace illnesses and correct hazards that are identified. We stay informed on the virus presence in our community and recommendations made by national and local health agencies. We review and update this plan as necessary. This plan was last reviewed on [MM/DD/YY].

[Company Name] will work to keep this program plan up to date and based on the latest regulations and guidance. However, even if this plan is not updated, [Company Name] will abide by the latest, in effect regulations and guidance notwithstanding the fact that this plan has not been updated.

If any of the information in this program is not clear to you, do not proceed with your assignment until you have contacted your immediate supervisor for additional information.

ABOUT COVID-19

* Coronavirus Disease 2019 (COVID-19) is a respiratory disease caused by the SARS-CoV-2 virus.
* The [virus is thought](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html) to spread mainly between people in close contact with one another (within about 6 feet). This transmission occurs when respiratory droplets are produced when an infected person coughs, sneezes or talks. These droplets can land in the mouths or noses of nearby people or possibly be inhaled into the lungs.
* SARS CoV-2 may also be spread by people who do not know they are infected (asymptomatic spread).
* Infection with SARS-CoV-2 can cause illnesses ranging from mild to severe and, in some cases, can be fatal.
* [Symptoms](https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html) typically include fever, cough, and shortness of breath. Symptoms of COVID-19 may appear in as few as two days or as long as 14 days after exposure
* Some people infected with the virus have reported experiencing other non-respiratory symptoms.
* [Vaccines](https://www.cdc.gov/coronavirus/2019-ncov/vaccines/your-vaccination.html) authorized by the U.S. Food and Drug Administration in the United States are highly effective at protecting most fully vaccinated people against symptomatic and severe COVID-19.

EXPOSURE RISK ASSESSMENT

Worker risk of occupational exposure to SARS-CoV-2 during an outbreak may vary from very high to high, medium, or lower (caution) risk. To help employers determine appropriate precautions, OSHA has divided job tasks into four risk exposure levels: very high, high, medium, and lower risk. The Occupational Risk Pyramid shows the four exposure risk levels in the shape of a pyramid to represent the probable distribution of risk. Most American workers will likely fall in the lower exposure risk (caution) or medium exposure risk levels. [Company Name] have reviewed [OSHA’s](https://www.osha.gov/coronavirus/safework) hazard recognition levels and determined that our employees fall into the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ exposure category. If more than one risk category is identified for employees, additional risk assessments should be completed.



* ***Very high*** exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures.
* ***High exposure*** risk jobs are those with high potential for exposure to known or suspected sources of COVID-19.
* ***Medium exposure*** risk jobs include 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.
* ***Lower exposure*** risk (caution) jobs 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.

PREVENTION AND PROTECTION

For most employers, protecting workers will emphasize basic infection prevention measures. As appropriate, [Company Name] will implement good hygiene and infection control practices, including:

* We are promoting frequent and thorough hand washing. We will provide workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, we will provide alcohol-based hand rubs containing at least 60% alcohol.
* Encourage our workers to stay home if they are sick.
* Continually encourage respiratory etiquette, including covering coughs and sneezes.
* Provide customers and the public with tissues and trash receptacles.

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* Recommend and allow face coverings usage (where feasible and not posing additional hazards). Masks and respirators can provide different levels of protection depending on the type of mask and how they are used.
* Maintain regular housekeeping practices, including but not limited to routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
* Self-Screening of Visitors - We have a symptom screening form posted at the entrances to our worksite and ask visitors to self-screen before entering the worksite.
* We prohibit any employee or visitor sick with COVID-19 from entering the workplace. Anyone exhibiting any potential symptoms of COVID-19 will immediately contact their manager or supervisor.

INFECTION MANAGEMENT/HEALTH MONITORING

We investigate all COVID-19 cases in the workplace. Our investigation includes seeking information from employees on COVID-19 cases and close contacts, obtaining information on COVID-19 test results and symptom onset, identifying and recording COVID-19 cases, and reporting when required by the regulations.

**REMOVAL FROM WORK**

We may send employees home who meet ANY of the following conditions by testing employees (where possible and available) OR using best judgment:

* Employees with a positive test or diagnosis for COVID-19 until the Return to Work criteria in the next section are met.
* Employees that have had close contact with the COVID-19 case until the Return to Work criteria in the next section are met. This will not apply to the following:
	+ Employees who were fully vaccinated before close contact and do not develop COVID-19 symptoms.
	+ Employees with a prior COVID-19 diagnosis who then met the return to work criteria and have remained symptom-free for 90 days following either 1) the initial onset of their past COVID case symptoms or 2) the first positive test for asymptomatic past COVID-19 cases.

**RETURN TO WORK**

Criteria for returning to work after testing positive for COVID-19 or having close contact with a COVID-19 case are based on [CDC’s](https://www.cdc.gov/media/releases/2021/s1227-isolation-quarantine-guidance.html) most recent recommended isolation and quarantine guidelines. This recommendation is subject to change, but as of December 27, 2021) are, as follows:

|  |  |
| --- | --- |
| **Person Who Test Positive for COVID-19 (Isolation)** | **Recommended Action** |
| Everyone, regardless of vaccination status, previous infection, or lack of symptoms. | * Stay home for 5 days.
* If you have no symptoms or your symptoms are resolving after 5 days, you can leave your house.
* Continue to wear a mask around others for 5 additional days.

*\*If you have a fever, stay home until your fever resolves.* |
| **Persons Who are Exposed to Someone with COVID-19 (Quarantine)** | **Recommended Action** |
| **If you:**Have been boosted**OR**Completed the primary series of Pfizer or Moderna vaccine within the last 6 months**OR**Completed the primary series of J&J vaccine within the last 2 months | * Wear a mask around others for 10 days.
* Test on day 5, if possible.

*\*If you develop symptoms, get a test and stay home.* |
| **Persons Who are Exposed to Someone with COVID-19 (No Quarantine)** | **Recommended Action** |
| **If you:**Completed the primary series of Pfizer or Moderna vaccine over 6 months ago and are not boosted**OR**Completed the primary series of J&J over 2 months ago and are not boosted**OR**Are unvaccinated | * Stay home for 5 days. After that continue to wear a mask around others for 5 additional days.
* If you can’t quarantine you must wear a mask for 10 days.
* Test on day 5 if possible.

*\*If you develop symptoms get a test and stay home*  |

EMPLOYEE TRAINING AND INSTRUCTION

We provide all employees training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at [Company Name] including:

* Information on how COVID-19 spreads, including airborne and asymptomatic transmission.
* The fact that viral particles can travel more than 6’, especially indoors, so physical distancing, face coverings, increased ventilation, and respiratory protection can decrease the spread of COVID-19 but are most effective when used in combination.
* Symptoms of COVID-19.
* The importance of getting a COVID-19 test and staying out of the workplace if you have symptoms.
* The importance of [vaccination against COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/vaccines/vaccine-benefits.html), and the fact that vaccination is effective at preventing serious illness or death.
* Risk of exposure to COVID-19 on the job.
* Cleaning and disinfection schedules and procedures for our workplace.
* Control measures to protect employees from exposure and infection:
	+ Requiring employees to stay home when sick.
	+ Frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing sinks are not readily accessible.
	+ Proper use of face coverings when required and the fact that a face covering is NOT respiratory protection. Face coverings are source control used to contain infectious particles and protect others; respirators protect the wearer from infectious airborne particles.
	+ Covering coughs and sneezes.
* Acceptable PPE and proper use.
* Policies for providing respirators and the right of employees who are not fully vaccinated to request a respirator for voluntary use. When respirators are provided for voluntary use:
	+ How to properly wear the respirator provided, and
	+ How to perform a user seal check each time the respirator is donned, and
	+ Facial hair can interfere with the seal of the respirator and reduce the amount of protection provided.
* What to do if they are sick and how to obtain a COVID-19 test.
* Information on COVID-19-related leave benefits available under legally mandated sick and vaccination leave, if applicable, workers’ compensation law, local governmental requirements, and [Company’s Name] leave policies
* The contents of this plan.

RECORDKEEPING

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus employers are responsible for recording cases of COVID-19, if:

* The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC); and
* The case is work-related as defined by 29 CFR § 1904.5; and
* The case involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.

Recording a COVID-19 illness does not, of itself, mean that the employer has violated any OSHA standard. And pursuant to existing regulations, employers with 10 or fewer employees and certain employers in low hazard industries have no recording obligations; they need only report work-related COVID-19 illnesses that result in a fatality or an employee's in-patient hospitalization, amputation, or loss of an eye.

RESOURCES

[1] Guidance on Preparing Workplaces for COVID-19 <https://www.osha.gov/Publications/OSHA3990.pdf>

[2] CDC’s Workplaces and Businesses

<https://www.cdc.gov/coronavirus/2019-ncov/community/workplaces-businesses/index.html>

[3] How COVID-19 Spreads <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html>

[4] Symptoms of COVID-19 <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

[5] Your COVID-19 Vaccination <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/your-vaccination.html>

[6] Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace <https://www.osha.gov/coronavirus/safework>

[7] CDC Updates and Shortens Recommended Isolation and Quarantine Period for General Population <https://www.cdc.gov/media/releases/2021/s1227-isolation-quarantine-guidance.html>

[8] Benefits of Getting a COVID-19 Vaccine <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/vaccine-benefits.html>

[7] Public Health Guidance for Community-Related Exposure <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>

[8] Information for Health Departments on Reporting Cases of COVID-19 <https://www.cdc.gov/coronavirus/2019-ncov/php/reporting-pui.html>

[9] Recording and Reporting Occupational Injuries and Illness <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.5>

[10] Recordkeeping Forms and Recording Criteria <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.7>

[11] Model COVID-19 Prevention Program <https://www.dir.ca.gov/dosh/coronavirus/ETS.html>