

DATE: March 24, 2020

SUBJECT: INFECTIOUS DISEASE PREPAREDNESS AND RESPONSE PLAN

REGULATORY STANDARD: Section 5(a)(1) of the OSHA Act
Centers for Disease Control

BASIS: A pandemic is a global disease outbreak. A pandemic occurs when a new influenza, or other virus emerges for which there is little or no immunity in the human population, begins to cause serious illness and then spreads easily person-to-person worldwide. A worldwide pandemic could have a major effect on the global economy, including travel, trade, tourism, food, consumption and eventually, investment and financial markets. Planning for pandemic issues by business and industry is essential to minimize a pandemic's impact. Companies that provide critical infrastructure services, such as power and telecommunications, also have a special responsibility to plan for continued operation in a crisis and should plan accordingly. As with any catastrophe, having a contingency plan is essential.

GENERAL: NOWLAND ASSOCIATES, INC will use this planning guidance to help identify risk levels in workplace settings and appropriate control measures that include good hygiene, cough etiquette, social distancing, the use of personal protective equipment and staying home from work when ill. Up-to-date information and guidance are available to the public through the www.pandemicflu.gov website and OSHA.gov.

RESPONSIBILITY: The company Safety Officer is solely responsible for all facets of this policy and has full authority to make necessary decisions to ensure its success.

Contents of the Pandemic Program

- 1. Pandemic Affects in the Workplace.**
- 2. Virus Spread.**
- 3. Employee Classification.**
- 4. Employee Protection.**
- 5. Risk Reduction.**
- 6. Pandemic Checklist.**

Pandemic Affects in the Workplace. Unlike natural disasters or terrorist events, an infectious disease (SARS, COVID-19, etc.) pandemic will be widespread, affecting multiple areas of the United States and other countries at the same time. A pandemic will also be an extended event, with multiple waves of outbreaks in the same geographic area; each outbreak could last from 6 to 8 weeks. Waves of outbreaks may occur over a year or more. Your workplace will likely experience:

- Absenteeism - A pandemic could affect as many as 40 percent of the workforce during periods of peak influenza illness. Employees could be absent because they are sick, must care for sick family members or for children if schools or day care centers

are closed, are afraid to come to work, or the employer might not be notified that the employee has died.

- Change in patterns of commerce - During a pandemic, consumer demand for items related to infection control is likely to increase dramatically, while consumer interest in other goods may decline. Consumers may also change the ways in which they shop as a result of the pandemic. Consumers may try to shop at off-peak hours to reduce contact with other people, show increased interest in home delivery services, or prefer other options, such as drive-through service, to reduce person-to-person contact.
- Interrupted supply/delivery - Shipments of items from those geographic areas severely affected by the pandemic may be delayed or cancelled.

Virus Spread. Influenza, and other viruses, are thought to be primarily spread through large droplets (droplet transmission) that directly contact the nose, mouth or eyes. These droplets are produced when infected people cough, sneeze or talk, sending the relatively large infectious droplets and very small sprays (aerosols) into the nearby air and into contact with other people. Large droplets can only travel a limited range; therefore, people should limit close contact (within 6 feet) with others when possible. To a lesser degree, human influenza is spread by touching objects contaminated with influenza viruses and then transferring the infected material from the hands to the nose, mouth or eyes. Airborne viruses may also be spread by very small infectious particles (aerosols) traveling in the air. The contribution of each route of exposure to influenza-type disease transmission is uncertain at this time and may vary based upon the characteristics of the actual strain.

Employee Classification. Employee risks of occupational exposure to infectious diseases during a pandemic may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on whether or not jobs require close proximity to people potentially infected with the pandemic airborne virus, or whether they are required to have either repeated or extended contact with known or suspected sources of pandemic airborne virus such as coworkers, the general public, outpatients, school children or other such individuals or groups.

- Very high exposure risk occupations are those with high potential exposure to high concentrations of known or suspected sources of pandemic viruses during specific medical or laboratory procedures.
- High exposure risk occupations are those with high potential for exposure to known or suspected sources of pandemic viruses.
- Medium exposure risk occupations include jobs that require frequent, close contact (within 6 feet) exposures to other people.
- Lower exposure risk (caution) occupations are those that do not require contact with people known to be infected with the pandemic virus, nor frequent close contact (within 6 feet) with the public. Even at lower risk levels, however, employers should be cautious and develop preparedness plans to minimize employee infections. Employers of critical infrastructure and key resource employees (such as law enforcement, emergency response, or public utility employees) may consider upgrading protective measures for these employees beyond what would be suggested by their

exposure risk due to the necessity of such services for the functioning of society as well as the potential difficulties in replacing them during a pandemic (for example, due to extensive training or licensing requirements).

To help employers determine appropriate work practices and precautions, OSHA has divided workplaces and work operations into four risk zones, according to the likelihood of employees' occupational exposure to pandemic viruses. Most American workplaces are likely to be in the medium exposure risk or lower exposure risk (caution) groups.

Employee Protection. For most employers, protecting their employees will depend on emphasizing proper hygiene (disinfecting hands and surfaces) and practicing social distancing (see page 26 for more information). Social distancing means reducing the frequency, proximity, and duration of contact between people (both employees and customers) to reduce the chances of spreading pandemic viruses from person-to-person. All employers should implement good hygiene and infection control practices. Occupational safety and health professionals use a framework called the "hierarchy of controls" to select ways of dealing with workplace hazards. The hierarchy of controls prioritizes intervention strategies based on the premise that the best way to control a hazard is to systematically remove it from the workplace, rather than relying on employees to reduce their exposure. In the setting of a pandemic, this hierarchy should be used in concert with current public health recommendations. The types of measures that may be used to protect yourself, your employees, and your customers (listed from most effective to least effective) are engineering controls, administrative controls, work practices, and personal protective equipment (PPE). Most employers will use a combination of control methods. There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. For example, hygiene and social distancing can be implemented relatively easily and with little expense, but this control method requires employees to modify and maintain their behavior, which may be difficult to sustain. On the other hand, installing clear plastic barriers or a drive-through window will be more expensive and take a longer time to implement, although in the long run may be more effective at preventing transmission during a pandemic. Employers must evaluate their workplace to develop a plan for protecting their employees that may combine both immediate actions as well as longer term solutions. Here is a description of each type of control:

Work Practice and Engineering Controls - Historically, infection control professionals have relied on personal protective equipment (for example, surgical masks and gloves) to serve as a physical barrier in order to prevent the transmission of an infectious disease from one person to another. This reflects the fact that close interactions with infectious patients is an unavoidable part of many healthcare occupations. The principles of industrial hygiene demonstrate that work practice controls and engineering controls can also serve as barriers to transmission and are less reliant on employee behavior to provide protection. Work practice controls are procedures for safe and proper work that are used to reduce the duration, frequency or intensity of exposure to a hazard. When defining safe work practice controls, it is a good idea to ask your employees for their suggestions, since they have firsthand experience with the tasks. These controls should be understood and followed by

managers, supervisors and employees. When work practice controls are insufficient to protect employees, some employers may also need engineering controls.

Engineering controls involve making changes to the work environment to reduce work-related hazards. These types of controls are preferred over all others because they make permanent changes that reduce exposure to hazards and do not rely on employee or customer behavior. By reducing a hazard in the workplace, engineering controls can be the most cost-effective solutions for employers to implement. During a pandemic, engineering controls may be effective in reducing exposure to some sources of pandemic viruses and not others. For example, installing sneeze guards between customers and employees would provide a barrier to transmission. The use of barrier protections, such as sneeze guards, is common practice for both infection control and industrial hygiene. However, while the installation of sneeze guards may reduce or prevent transmission between customers and employees, transmission may still occur between coworkers. Therefore, administrative controls and public health measures should be implemented along with engineering controls.