

Coronavirus and an Infectious Disease Preparedness and Response Plan

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(Note: This is Part 3 in a series of alerts for employers concerning the coronavirus that focuses on being prepared in the workplace. [Read Part 1 here](#) and [Part 2 here](#). Check back for additional alerts coming soon.)

With the World Health Organization's declaration of a pandemic of the COVID-19 virus, it is now critical for employers to develop an infectious disease preparedness and response plan.

The Occupational Safety and Health Administration (OSHA) recently published [Guidance on Preparing Workplaces for COVID-19](#) which outlines steps employers should take to protect the health and safety of their workforces. Among those steps is to develop an infectious disease preparedness and response plan. According to OSHA, the plans should consider and address the level of risk associated with various worksites and tasks workers perform at those sites.

Under the guidance, worker risk is classified into four categories: very high, high, medium and lower risks. The risks category should guide the details of your policy and response plan.

Very high risk exposure groups include, among others, health care workers (doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures (e.g., intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients and health care or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients.

High exposure risk jobs include health care delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients and medical transport workers moving known or suspected COVID-19 patients in enclosed vehicles.

Medium exposure jobs include those that require frequent and/or close contact (i.e., within 6 feet of) with people who may be infected with SARS-CoV-2 but who are not known or suspected COVID-19 patients. In areas where the COVID-19 virus has been identified, this may include workers who come in contact with the public, including in schools or retail settings. Lower exposure risk jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent closed contact with the general public.

In addition to consideration of workers' risks, plans should also take into account contingencies that may arise during the pandemic, including:

- Increased rates of worker absenteeism

- The need for social distancing, staggered work shifts, downsizing operations, delivering services remotely and other exposure-reducing measures
- Options for conducting essential operations with a reduced workforce, including cross-training workers across different jobs in order to continue operations or deliver surge services
- Interrupted supply chains or delayed deliveries

Plans should also address steps employees can take to reduce the risk of exposure, including basic infection-control practices such as handwashing, staying home when sick and respiratory etiquette.

Employers should also develop a procedure for prompt identification and isolation of sick people if appropriate. Employers are encouraged to inform employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure and make clear that employees must report when they are sick or experiencing symptoms of COVID-19. Where appropriate, employers should develop policies and procedures for immediately isolating people who have signs and symptoms of COVID-19. Further, employers should consider updating policies related to sick leave or other paid time off as well as telecommuting or work from home arrangements.

Employers should also review and ensure that they have in place OSHA compliant workplace controls to reduce exposure to COVID-19. This includes review of:

- Engineering controls such as (air filters, increased ventilation and physical barriers)
- Administrative controls such as requiring sick workers to stay home, minimizing contact among workers with avoiding face-to-face meetings, discontinuing nonessential travel, emergency communication plans
- Safe work practices such as promoting personal hygiene practices (hand washing)
- Personal protective equipment such as gloves, face masks, goggles and respiratory protection, when appropriate

Employers needing assistance with infectious disease policies and exposure control plans should [contact me](#) or consult a member of the [Barley Snyder COVID-19 Response Team](#).

More on the legalities of coronavirus:

EDUCATION: [Coronavirus Resources for Schools](#)

EMPLOYMENT: [Coronavirus Risk Assessment, the ADA and FMLA](#)

BUSINESS: [How Governments Could Affect Your Business During Coronavirus Outbreak](#)

EMPLOYMENT: [Coronavirus and Workplace Preparedness](#)

BUSINESS: [Is COVID-19 a "Force Majeure" Event?](#)

SENIOR LIVING: [Coronavirus and Senior Living Facilities](#)

EDUCATION: [Schools Already Planning for Coronavirus](#)

BUSINESS: [Planning for Coronavirus: A Necessary Business Exercise](#)

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