


Acknowledgement


To the best of our knowledge, the information presented during this session and the reference material(s) provided is current as of the presentation date. Information on risks, policies and government regulations may change over time. Should changes occur, it is your responsibility to determine the impact on this material and we suggest you update your practice(s)/procedure(s) as needed.

The information within this presentation is not intended to be comprehensive and additional information may be necessary to meet your specific needs.



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COVID-19 Pandemic Plan Development

A Simple Checklist Will Not Address Your Exposures As No One Size Fits All

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Tony Kuehn, CSP, OHST, ALCM
Health & Safety Services Director/Consultant
Integrated Loss Control, Inc.



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Objectives

- COVID-19/SARS CoV-2 Facts and Figures
- Discuss the performance standard approach to developing a pandemic plan
- Review some of the details of the four main steps any employer will need to go through to minimize occupational exposure (e.g. COVID-19):
 - Reviewing organization operations, exposures present or anticipated
 - Review guidelines, resources and references relating to potential exposure
 - Assign a team/individual to set policies, train employees
 - Have an assigned person/team periodically re-evaluate the procedures/policies
- Provide insight on the various controls being used during this pandemic using the Hierarchy of Controls (Avoidance, Engineering, Substitution, Administrative and Personal Protective Equipment(PPE)).
- Provide Necessary References
- Answer questions




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Performance Standard

The performance standard approach to developing a pandemic plan

- OSHA does not have a specific set of rules or standard for compliance purposes. No infectious diseases standard is forthcoming either (at the Federal level). The state, local departments of health and CDC are setting the standards.
- Some OSHA requirements may apply to preventing occupational exposure to biologicals during a pandemic outbreak which include: Personal Protective Equipment (PPE) 29 CFR 1910.132-1910.133 and 1910.38 using gloves, eye and face protection; and Respiratory Protection 29 CFR 1910.134
- OSHA's Bloodborne Pathogens (BBP) standard 29 CFR 1910.1030 applies to occupational exposure to human blood and other potentially infectious materials that typically do not include respiratory secretions that may transmit pathogens. However, the provisions of the standard offer a framework that may help control some sources of the virus, including exposures to body fluids (e.g.- respiratory secretions) not covered by the BBP standard.

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Performance Standard

The performance standard approach to developing a pandemic plan

- Employer must also protect their workers from exposure to hazardous chemical used for cleaning and disinfection. Employers should be aware that common sanitizers and sterilizers (such as those on the EPA "N" list) could contain hazardous chemicals. Where exposures exist, employers must comply with OSHA's Hazard Communication standard 29 CFR 1910.1200.
- Parts of 29 CFR 1910.141 Sanitation apply as well as General Duty Clause 5(a) requires employers to furnish to each worker "employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm."
- OSHA leaves it up to you as the employer how to accomplish compliance or achieve hazard minimization through written programs and implementation.**


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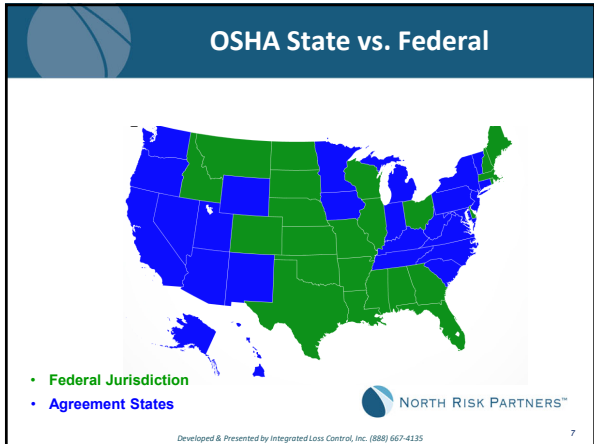
Development of Plan

A pandemic plan, checklist, or training program when developed, has to reflect the uniqueness of your organization (state, locations, operations, employee population, specific controls that will be implemented).

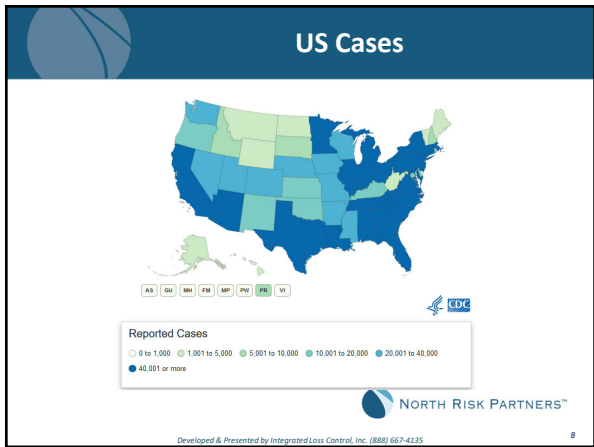
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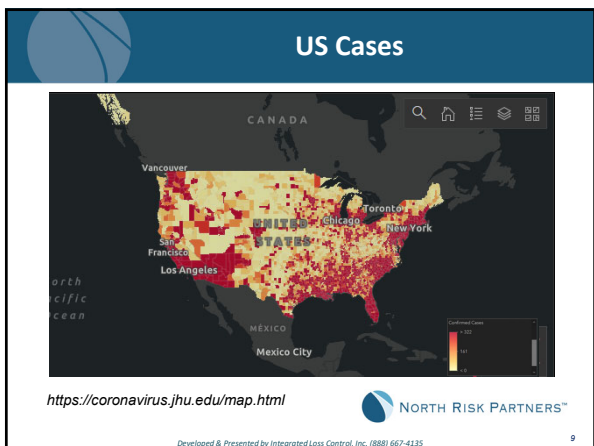
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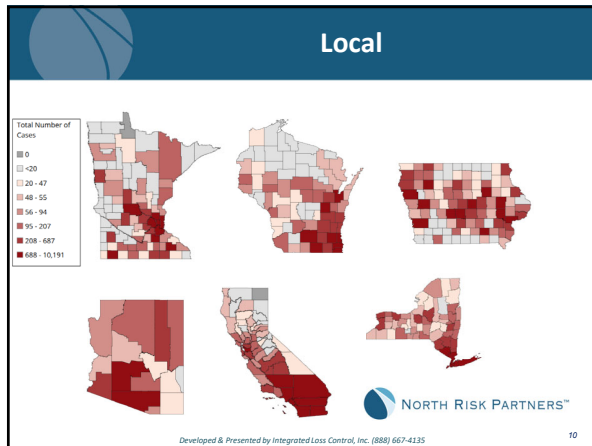
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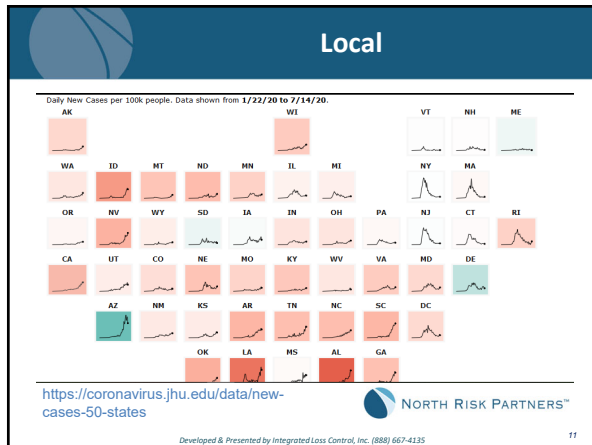
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COVID-19/SARS CoV-2

- COVID-19 initiates infection in the respiratory system and may impact other organs and tissues.
- SARS CoV-2 just like SARS CoV requires the angiotensin converting enzyme 2 (ACE2) as a receptor to enter cells.
 - Upper Respiratory tract has limited distribution of ACE2
 - Lower Respiratory tract is rich with ACE2.
- Epidemiological evidence of aerosol transmission in family clusters, buses, meetings, restaurants, funerals, choir practice, etc. (also indicate its aerosol transmission) .
- Animal models show aerosol transmission(ferrets, macaques)


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COVID-19/SARS CoV-2

- SARS CoV-2 **survives** on smooth surfaces (hours, days)
- SARS CoV-2 **survives** in the air for up to 16 hours (no half life)
- SARS CoV-2 **survives** in viral transport medium at 4C (40 degrees F) up to 14 days (5 minutes at 70C/158 degrees F)



1 van Doremalen, Neeltje, et al. "Aerosol and surface stability of SARS-CoV-2 as compared with SARS-CoV-1." *New England Journal of Medicine* (2020).
 2 Kuan, Hsuan-C, et al. "Comparative dynamic aerosol efficiencies of three emergent coronaviruses and the unusual persistence of SARS-CoV-2 in aerosol suspensions." *medRxiv* (2020).
 3 Chin, Alex, et al. "Stability of SARS-CoV-2 in different environmental conditions." *medRxiv* (2020).

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4 Key Steps

Details of the four main steps any employer will need to go through to minimize occupational exposure (e.g. COVID-19):

- 1-Reviewing organization operations, exposures present or anticipated
- 2-Review guidelines, resources and references relating to potential exposure
- 3-Assign a team/individual to set policies, train employees
- 4-Have an assigned person/team periodically re-evaluate the procedures/policies

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4 Key Steps- Step 1

Reviewing organization operations, exposures present or anticipated

Organization A:

- Manufacturing
- Fixed Location
- Part-time, Full time employees
- Multiple Shifts
- Limited Number of Visitors
- Products Drop Shipped, No Client pick-up
- No installation, Set-Up of Product at Client Sites(s)

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4 Key Steps- Step 1

Reviewing organization operations, exposures present or anticipated

Organization B:

- Construction Contractor
- Mobile employees
- Full-Time, Part-Time, Seasonal Employees
- Shared Equipment
- Shared Transportation(maybe)
- Multi-employer Job Sites (shared work area)
- Shared Break Area
- Vendor, Equipment, Materials Delivery to the Site
- Travel to Sites for Breaks, Equip. Materials, Supplies.

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4 Key Steps-Step 1

Reviewing organization operations, exposures present or anticipated

Organization C:

- Service Provider
- Mobile employees
- Full-Time, Part-Time, Seasonal Employees
- Public Transportation, Client Transportation
- Non-Owned Job Sites (possible shared work area)
- Client Screened, or Unknown
- Employee is the visitor to the Location

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4 Key Steps-Step 1

Reviewing organization operations, exposures present or anticipated

Organization D: Is This You??

- What Are Your Specific Operations, Services Offered?
- Type of Employees?
- Work Shifts?
- Client, Vendor Contacts?
- Site Type?
- Can You Control the Site or Does Someone Else?
- Where are Your Employees Exposed?
- What Controls Will Work?
- Who Will Evaluate the Plan?
- Employees Need to See Your Plan, and Understand It?
- Do You Need to Submit Your Plan to Your Clients, Customers?

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4 Key Steps-Step 2

Review guidelines, resources and references relating to potential exposure for your operations, services provided:

- Governor's Association
- Federal OSHA
- Local OSHA
- FEMA
- Local Department of Health
- CDC/NIOSH
- National Safety Council (NSC)
- State/ Region Safety Council
- Department of Human Services
- WHO*
- Your Physician ,Health Care Provider
- State Workers' Compensation Commission
- Your WC Carrier
- Insurance Agency, Risk Advisor-North Risk Partners
- Trade Associations (Association of Safety Professionals, Industrial Hygienists-AIHA, ACGIH)

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4 Key Steps-Step 3

Assign a team/individual to set policies, train employees (multiple levels)

- Plan Administrator(s) or Coordinator
- Who Will Be On Your Team:
 - Upper Management
 - Middle Management
 - Team Leads, Foreman, Superintendents, Project Managers, Controller
 - Employee Safety Committee
 - Employees, Production, General Laborer, Client Sales, Service
 - Trade Association Rep
 - Union Rep
 - General Contractor Rep
 - Subcontractor Rep
 - Others??

Coordination and collaboration will be necessary for the team, or teams to limit, control the exposure

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4 Key Steps-Step 4

Have an assigned person/team periodically re-evaluate the procedures/policies

- Is The Plan Working? (Who Will Determine This)
- How Will You Know?
- How Can It Be Demonstrated to Others?
- Utilize the Positive Lessons Learned
- Limit Repeated Mistakes
- Be Successful!!!


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Hierarchy of Controls

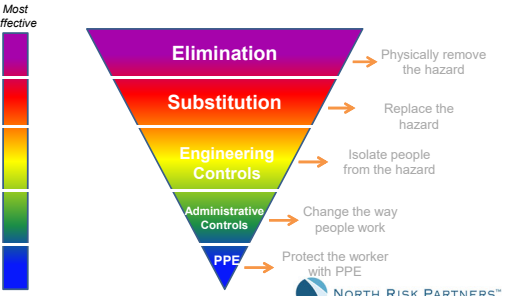
Provide insight on the various controls being used during this pandemic using the Hierarchy of Controls (Avoidance, Engineering, Substitution, Administrative and Personal Protective Equipment (PPE)).



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Hierarchy of Controls




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Pandemic Controls

Engineering and Work Practice (Administrative, Substitution) Controls:

- Working Remotely if Possible (e.g. COVID-19 concerns)
- Employee, Visitor Distancing (6 ft. or more- COVID-19); Increased Distancing
- Barriers if Distancing Cannot be Achieved (COVID-19)
- Minimizing Employee Meetings in Large Numbers (10 or more)
- Sharps Disposal Containers (mostly BBP), Other Waste Containers (All)
- Hand hygiene (Washing, Alcohol hand gel-BBP and COVID-19, Plus Seasonal flu, Norovirus and others)
- Surface Cleaning, Disinfection, Sanitization (EPA "N" List)
- Grouping: Limit Common Assembly Areas (Food, Water, Transportation, Elevators), Implement Traffic Controls, Manage Flow of People




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Pandemic Controls

Engineering and Work Practice (Administrative Substitution) Controls cont.:

- Minimize Sharing of Equipment, No Loaning of Equipment
- Respiratory hygiene/Cough Etiquette (Especially COVID-19)
- Informing Management of Illness, Symptoms (All)
- Stay at Home if Sick or Have Symptoms of Illness (Especially COVID-19)
- Leave Work if Sick or Develop Symptoms (Especially COVID-19)
- Employee, Vendor, Visitor Screening (Questionnaires, Taking Temps)
- Changing the Ventilation in Occupied Spaces (ASHRAE, Maintenance Eng.)
- Access Control-Keep a Log (not a sign in/sign out sheet) in Case Needed for Tracing
- Dedicated Areas for Delivery, Mail, Article Isolation
- Others???

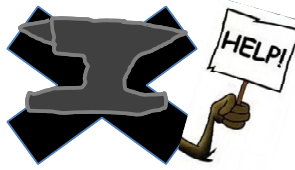
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Pandemic Controls

Engineering and Work Practice (Administrative Substitution) Controls :



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Pandemic Controls

Personal Protective Equipment FAQs:


PPE Definition- PPE is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical, or other workplace hazards.

Who Pays For It?(check your state, for example- employer required in MN)

PPE Hazard Assessment is Required (except for Construction, where it is still a best practice)

Examples-Safety Glasses/Goggles, Face Shields, Gloves, Gowns, Aprons, Footwear

Note: Facial Cloth Coverings Are Not Considered PPE (*OSHA classifies them as Administrative Controls on its website and published documents*)

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Pandemic Controls

The employer determines the necessary PPE required for the job task(s). The employer is responsible for payment, replacement, maintenance, cleaning, laundering, and disposal of PPE. Training should be provided to employees regarding proper use, limitations, care, and maintenance of PPE. Where respirators are provided, the following table outlines additional requirements:

Employer Guide to Voluntary vs. Required Respirator Use

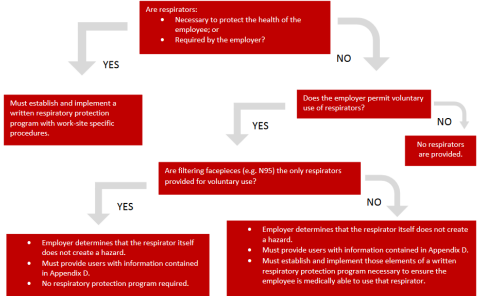
	Filtering Facepiece Respirator (e.g. N95)	
	Required Use	Voluntary Use
Fit Testing	Yes	No
Medical Evaluation	Yes	No
Facial Hair Prohibited	Yes	No
Appendix D Provided	No	Yes
Training per 1910.134(k)	Yes	No
Cleaning, Storage & Maintenance of Respirator	Yes	Yes


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Pandemic Controls



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Masks/Respirators

Performance of Masks & Respirators Depends Upon Three Things:

- **Efficiency of the Filter** - How Well does the Filter Collect Airborne Particles?
- **Fit** - How Well does the filtering facepiece prevent inward leakage of particles?
- **Proper use** - Proper donning and checking the seal may affect performance

Availability is also a concern.....

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Challenges to Rules, Guidelines, Mandates

Law suits challenging facial coverings, mask mandates are on-going.

Some Examples Include:

- Florida
- New Hampshire
- California

Also some Trade Associations are publishing position statements objecting to facial cover/mask mandates (e.g. Child, Adult Day Care, Restaurant Assoc.)

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Summary

If an employer goes through this performance review process (the exercise) they demonstrate their due diligence relevant to the determination of potential work place COVID-19 exposures and controls.

This approach has worked for the exposures before COVID-19 and it will likely work for future pandemic exposures to be encountered.

But you need to go through the exercise..... 

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References:


OSHA-Federal www.osha.gov Especially documents 3990 and 4045-06

National Governor's Association: <https://www.nga.org/coronavirus/>

Minnesota-DOLI
<https://www.dli.mn.gov/business/workplace-safety-and-health/mnosh-compliance-novel-coronavirus-covid-19>

Centers for Disease Control (CDC) www.cdc.gov

Minnesota Department of Health (MDH)
<https://www.health.state.mn.us/diseases/coronavirus/index.html>

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References Cont.:

Minnesota OSHA – COVID-19 Preparedness Plan template and instructions at www.dli.mn.gov/updates

Minnesota Department of Workers Compensation www.dli.mn.gov/updates

U.S. Department of Labor, Occupational Safety and Health Administration- Guidance for Preparing Workplaces for COVID-19 at www.osha.gov/Publications/OSHA3990.pdf

California OSHA –Aerosol transmissible diseases model exposure control plan at www.dir.ca.gov/dosh/coronavirus/Health-Care-General-Industry.html

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Questions?

Thank you for attending!

Stay Tuned....

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