

# Reopening a Business with Workers of Lower to Medium Exposure Risk to SARS-CoV-2

(see *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020 and *CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*)

This document is intended to be a guide, or template, for the generation of a Business Reopening Plan that should be followed to ensure that Occupational Safety and Health Administration as well as Centers for Disease Control requirements and suggestions are met. At all times the controlling documents are the latest versions of *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020 and *CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*, and supersede any recommendation issued herein.

Following this template will both streamline the reopening planning process, as well as ensure consistency of plans between economic sectors including agriculture, childcare, k-21 and post-secondary education, manufacturing, retail, services, and tourism. All of which are generally considered Lower to Medium Exposure Risk businesses (see definitions below).

Definition of risk classification associated with jobs:

1. **Lower Exposure Risk** - those that 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. Workers in this category have minimal occupational contact with the public and other coworkers
  - a. Manufacturing
  - b. Agriculture
2. **Medium Exposure Risk** - 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, i.e. general public
  - a. Restaurants/Retail
  - b. K-12/Post-secondary education/Workforce Development
  - c. Tourism/Hospitality/Attractions
  - d. Services
    - i. Office Based
      1. Financial institutions/Wealth Management/Accounting
    - ii. On-site
      1. Contractors/Plumbers/Electricians/other
  - e. Childcare
3. **High or Very High Exposure Risk** - jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:
  - a. Healthcare workers including laboratory personnel
  - b. Medical transport

- c. Morgue and Mortuary workers  
(In workplaces where workers have high or very high exposure risk, employers should follow the guidance in *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020)

## **Sector Template** (See Appendix for detailed guidance)

- 1. Plan components to be developed and recommended by each economic sector grouping**  
(specific grayed areas are areas on which sector groups should focus input)
  - a. [Develop an Infectious Disease Preparedness and Response Plan](#)
  - b. [Implement basic infection prevention measures](#)
  - c. [Develop policies and procedures for prompt identification and isolation if sick employees](#)
  - d. [Develop, implement, and communicate about workplace flexibilities and protections](#)
  - e. [Implement workplace controls](#)
  - f. [Continued adherence to all existing OSHA standards](#)
  
- 2. Plan components to be developed and implemented at an individual company level:**
  - a. Analysis of current capacity and capabilities for disease control and prevention
    - i. Identify gaps in necessary workplace controls
      1. i.e. table spacing in a restaurant, distance between register and customer, use of rest rooms, breaks and break rooms, other.
    - ii. Rectify gaps in necessary workplace controls
      1. Tied to OSHA/CDC requirements
  - b. Identification of vulnerable employees
    - i. Those of advanced age (>65)
    - ii. Those with chronic medical conditions
      1. Asthma or lung disease
      2. Heart conditions
      3. Immunocompromised
      4. Severely obese (BMI>40)
      5. Diabetics
      6. Those with liver or kidney disease undergoing dialysis
  - c. Implement controls to address the vulnerable
    - i. Minimize face-to-face contact between these employees or assign work tasks that allow them to maintain a distance of six feet from other workers, customers and visitors, or to telework if possible.
  - d. Identification of any idiosyncrasies associated with a particular business
    - i. I.e. Employee travel to and from customer sites, customer visits, cleaning of items frequently handled by customers and/or employees, etc.

# Appendix

## Requirements of OSHA and CDC

For Lower to Medium Exposure risk workers (see *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020 for further details on all risk levels and CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)).

This guide is not intended to be definitive, but to address situations where **lower to medium exposure risk** workers are not within 6 feet of someone known, or suspected to have, SARS-CoV-2, and not performing body fluid aerosol-generating procedures.

Definition of risk classification associated with jobs:

1. **Lower Exposure Risk** - those that 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. Workers in this category have minimal occupational contact with the public and other coworkers
  - a. Manufacturing
  - b. Agriculture
2. **Medium Exposure Risk** - 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, i.e. general public
  - a. Restaurants/Retail
  - b. K-12/Post-secondary education/Workforce Development
  - c. Tourism/Hospitality/Attractions
  - d. Services
    - i. Office Based
      1. Financial institutions/Wealth Management/Accounting
    - ii. On-site
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  - e. Childcare
3. **High or Very High Exposure Risk** - jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:
  - a. Healthcare workers including laboratory personnel
  - b. Medical transport
  - c. Morgue and Mortuary workers

(In workplaces where workers have high or very high exposure risk, employers should follow the guidance in *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020)

The following section describes basic steps that every employer can take to reduce the risk of worker exposure to SARS-CoV-2, the virus that causes COVID-19, in their workplace.

### **1. Each company to develop an Infectious Disease Preparedness and Response Plan**

- a. Address the level of risk associated with various worksites and job tasks
  - i. Sources of SARS-CoV-2 exposure
    1. General public, customers, co-workers, high risk individuals (those who travel to infected areas, healthcare workers, etc.)
  - ii. Non-occupational risk factors at home and in community
  - iii. Workers individual risk factors
    1. Those of age > 65, chronic medical conditions, etc.
      - a. Asthma or lung disease
      - b. Heart conditions
      - c. Immunocompromised
      - d. Severely obese (BMI>40)
      - e. Diabetics
      - f. Those with liver or kidney disease undergoing dialysis
- b. Controls necessary to address those risks
  - i. Consider minimizing face-to-face contact between these employees or assign work tasks that allow them to maintain a distance of six feet from other workers, customers and visitors, or to telework if possible
- c. Procedure to address a suspected infection
  - i. Isolation
  - ii. Quarantine
  - iii. Communication to Public Health officials
- d. Outbreak contingency plan to deal with:
  - i. Increased absenteeism
  - ii. Need for social distancing, staggered work shifts, downsizing operations, other exposure-reducing measures
  - iii. Conducting essential operations with reduced workforce
    1. Cross training of workforce
  - iv. Interrupted supply chains

### **2. Implement basic infection prevention measures**

- a. Promote frequent and thorough [hand washing](#), including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol
- b. Encourage workers to stay home if they are sick
- c. Encourage respiratory etiquette, including covering coughs and sneezes
- d. Provide customers and the public with tissues and trash receptacles
- e. Employers should explore whether they can establish policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees and between employees and others if state and local health authorities recommend the use of social distancing strategies.

- f. Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible
- g. Maintain regular housekeeping practices, including routine cleaning and disinfecting of all frequently touched surfaces, equipment, and other elements of the work environment. When choosing cleaning chemicals, employers should consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens
- h. Provide tissues and no-touch disposal receptacles.
- i. Provide soap and water in the workplace. If soap and water are not readily available, use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer. Ensure that adequate supplies are maintained.
- j. Place hand sanitizers in multiple locations to encourage hand hygiene.
- k. Place posters that encourage hand hygiene to help stop the spread at the entrance to your workplace and in other workplace areas where they are likely to be seen.
- l. Discourage handshaking - encourage the use of other noncontact methods of greeting.
- m. Direct employees to visit the coughing and sneezing etiquette and clean hands webpage for more information  
([https://www.cdc.gov/healthywater/hygiene/etiquette/coughing\\_sneezing.html](https://www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html))

### **3. Develop policies and procedures for prompt identification and isolation if sick employees**

- a. Employers should inform and encourage employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure
- b. Employers should develop policies and procedures for employees to report when they are sick or experiencing symptoms of COVID-19
- c. Where appropriate, employers should develop policies and procedures for immediately isolating people who have signs and/or symptoms of COVID-19, and train workers to implement them. Move potentially infectious people to a location away from workers, customers, and other visitors. Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until potentially sick people can be removed from the worksite
- d. If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). The employer should instruct fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure
- e. If a sick employee is suspected or confirmed to have COVID-19, follow the CDC cleaning and disinfection recommendations (<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>)
- f. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments.
- g. Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC recommended precautions.

#### **4. Develop, implement, and communicate about workplace flexibilities and protections**

- a. Actively encourage sick employees to stay home
- b. Ensure that sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies
- c. Talk with companies that provide your business with contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies
- d. Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness or to return to work, as healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way
- e. Maintain flexible policies that permit employees to stay home to care for a sick family member. Employers should be aware that more employees may need to stay at home to care for sick children or other sick family members than is usual

#### **5. Implement workplace controls - with some recommended examples**

- a. Engineering controls – does not rely upon worker behavior, i.e. isolation of employees from work-space hazards
  - i. Air filters/filtration
  - ii. Increase ventilation rates
  - iii. Install physical barriers (i.e. plastic sneeze guards)
  - iv. Drive through window for customer service
- b. Administrative controls - requires action by the worker or employer
  - i. Sick workers to stay at home.
  - ii. Use virtual communications and telework when feasible
  - iii. Establishing alternating days or extra shifts to reduce the number of employees in a facility at a given time
  - iv. Discontinuing nonessential travel to locations with ongoing COVID-19 outbreaks
  - v. Developing emergency communications plans, including a forum for answering workers' concerns
  - vi. Worker education and training on COVID-19 risk factors and protective behaviors (e.g., cough etiquette and care of PPE)
- c. Safe work practices - procedures for safe and proper work
  - i. Providing resources and a work environment that promotes personal hygiene. For example, provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs containing at least 60 percent alcohol, disinfectants, and disposable towels for workers to clean their work surfaces
  - ii. Requiring regular hand washing or using of alcohol-based hand rubs. Workers should always wash hands when they are visibly soiled and after removing any PPE
  - iii. Post handwashing signs in restrooms

- d. Personal protective equipment – as needed. Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs. The types of PPE required during a COVID-19 outbreak will be based on the risk of being infected with SARS-CoV-2 while working and job tasks that may lead to exposure
  - i. Selected based upon the hazard to the worker
  - ii. Properly fitted and periodically refitted, as applicable (e.g., respirators)
  - iii. Consistently and properly worn when required

**6. Continued adherence to all existing OSHA standards**

- a. <https://www.osha.gov/>

**View Industry Examples:**

- <https://www.chautauquachamber.org/covid-19-and-the-workplace.html#restart>

**Source Documents:**

- <https://www.osha.gov/Publications/OSHA3990.pdf>
- <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>