

COVID-19 EXPOSURE CONTROL PLAN TEMPLATE

1. PURPOSE

The purpose of this Plan is to prepare XYZ Law Office facilities and workplaces for re-opening and operating safely during the current COVID-19 pandemic by:

- Implementing measures to minimize the risk of infection to employees, clients, and others present at XYZ Law Office facilities;
- Establishing procedures for rapid response if individuals develop symptoms of illness while working or visiting XYZ Law Office facilities;
- Maintaining high levels of sanitation and personal hygiene at the facilities at all times; and
- Ensuring compliance with all applicable Occupational Safety and Health requirements (“OSHA regulations”) and the guidelines of the U.S. Centers for Disease Control and Prevention and other public health agency guidelines (“Guidelines”).

2. ROLES & RESPONSIBILITIES

2.1 Employer

As employer, XYZ Law Office is responsible for the overall implementation of the Plan, including by:

- Providing the leadership and resources necessary for the effective implementation of the Plan;
- Appointing a competent person to serve as COVID-19 Coordinator;
- Regularly reviewing the Plan;
- Monitoring the pandemic situation as it evolves to ensure that the Plan remains timely and in compliance with the most recent Guidelines; and
- Ensuring that workers receive the most current information about the pandemic and implementation of the Plan.

2.2 COVID-19 Coordinator

The COVID-19 Coordinator is responsible for the day-to-day implementation of the Plan, including ensuring that:

- The COVID-19 workplace hazard assessment is carried out;
- Appropriate infection prevention and engineering and administrative controls are implemented to eliminate or minimize identified COVID-19 hazards;
- Medical screening and self-isolation procedures are carried out in a way that is fair, consistent, safe and as minimally privacy invasive as possible;
- All exposed workers receive and properly use the required PPE;
- All workers receive and follow their COVID-19 safety training and instruction;
- All clients and visitors comply with Plan requirements; and

- All COVID-19 incidents are properly investigated and, if necessary, reported to OSHA, the Workers Compensation Board and other regulatory officials or entities.

2.3 Supervisors

Supervisors are responsible for:

- Developing and carrying out the safe work procedures necessary to implement the Plan;
- Ensuring the required COVID-19 field level hazard assessment is carried out before work begins;
- Delivering COVID-19 safety training and verifying that workers understand and are capable of following it on the job;
- Ensuring workers properly use, inspect, clean and store required PPE;
- Enforcing the requirements of the Plan and safe work procedures including, if necessary, via the imposition of discipline against workers that commit infractions; and
- Communicating with workers in self-isolation.

2.4 Workers

Workers are responsible for:

- Not coming to work if they feel ill;
- Complying with all XYZ Law Office infection control and social distancing rules and COVID-19 safe work procedures;
- Properly using the required PPE; and
- Reporting any violations of this Plan to their supervisor or other appropriate XYZ Law Office officials.

3. COVID-19 HAZARD ASSESSMENT

3.1 Job Classification Hazard Assessment

The COVID-19 Coordinator will create a written inventory of COVID-19 hazards by job classification and/or operations undertaken at the site. Using the inventory of identified hazards, the Coordinator will then perform a COVID-19 hazard assessment by assigning each job classification one of the following levels of exposure:

- Very high;
- High;
- Medium; or
- Low.

In rating each job classification, the Coordinator will consider COVID-19 risk factors, including:

- Physical distance of workers from co-workers, clients and other persons at the site;
- Effectiveness of current ventilating, air circulation and HVAC systems;
- Operations requiring close contact, e.g., sharing of vehicles;

- Age, respiratory or immune disorders, or other chronic medical conditions or physical characteristics making persons at the site unusually susceptible to COVID-19 infection; and
- Availability of respirator masks and other necessary PPE.

3.2 Field Level Hazard Assessments

In addition and as a supplement to the above job hazard classification, a competent worker or supervisor at the site will perform a COVID-19 field level hazard assessment before work begins.

3.3 Review & Revision

All hazard assessments will be regularly reviewed and revised to ensure they reflect current site conditions and operations and comply with most recent OSHA regulations and Guidelines requirements.

4. COVID-19 SAFETY CONTROLS

XYZ Law Office will implement appropriate safety measures to control the COVID-19 hazards identified during hazard assessment in accordance with the assigned level of exposure and following principles:

- Where reasonably practicable, XYZ Law Office will take measures that completely eliminate the hazard, e.g., by letting susceptible workers work from home or eliminating operations requiring one or more worker to be in a vehicle at the same time;
- Where elimination is not reasonably practicable, XYZ Law Office will implement engineering controls to minimize COVID-19 hazards, e.g., air-circulating and ventilating systems or physical partitions ensuring people at the office remain separated;
- XYZ Law Office will implement administrative controls, either in lieu of or in combination with engineering controls to minimize COVID-19 hazards, including the social distancing, medical screening, cleaning and disinfection and safety training protocols set forth below; and
- As a last resort where COVID-19 hazards cannot be eliminated or engineered away, XYZ Law Office will ensure that all persons exposed to COVID-19 hazards have and properly use the appropriate PPE while present at the site, in accordance with Section 9 below.

5. SOCIAL DISTANCING

XYZ Law Office will implement appropriate and reasonably practicable measures to ensure that persons at the workplace remain at least 6 feet apart. Such measures may include:

- Reviewing floor plans to determine how to maintain distance between work stations and separate workers from clients and visitors;
- Installing physical separation equipment such as Plexiglas screening;
- Posting signs warning occupants to maintain social distancing;
- Marking out designated traffic flow paths for high volume areas;

- Marking the distance of checkout areas;
- Limiting the number of persons allowed to enter the office at any one time;
- Staggering work shifts to keep on-site staffing levels to the minimum possible;
- Staggering breaks, restricting access to and/or reducing seating capacity/density in reception areas, lunchrooms, meeting rooms and other gathering places;
- Creating an elevator usage plan limiting the number of people allowed in elevators at one time;
- Substituting virtual meetings for in-person meetings whenever possible
- Where in-person meetings can't be avoided, limiting them to the fewest participants possible and holding them in the biggest space available;
- Allowing employees not needed at the site work from home;
- Establishing and strictly enforcing clear social distancing rules and protocols; and
- Using encounter logs, contact tracing apps or other methods to track the physical whereabouts of occupants and ensure they are complying with social distancing protocols while at the site.

6. MEDICAL SCREENING

Until the current public health emergency ends, all persons seeking entrance to XYZ Law Office sites must undergo medical screening at checkpoints established at building entrances in accordance with the Medical Screening Policy created by XYZ Law Office to ensure that medical screening protocols:

- Respect the privacy rights of persons undergoing screening;
- Are carried out fairly and consistently without regard to race, age, disability, religion, sex or any other personal characteristic protected by federal and state discrimination laws;
- Are performed safely by medical professionals or personnel with appropriate medical training using the appropriate PPE and protective equipment; and
- Comply with the most current Guidelines.

7. SELF-ISOLATION

7.1 Policy Statement

Workers who test positive for, exhibit symptoms of or are at otherwise at high risk of infection due to travel or direct and recent contact with a person that has COVID-19 not be allowed to enter or remain in the workplace and must go into and remain in self-isolation in accordance with current Guidelines.

7.2 Self-Isolation Procedures

Workers that meet the criteria for self-isolation described above must immediately notify their supervisors, explain their situation, e.g., tested positive or symptomatic, and identify all co-workers and others with whom they had close contact at the facility in the past 48 hours. The supervisor will immediately contact individuals identified as having had close contact with the worker and require them to go into self-isolation (subject to exceptions for health care and

essential service workers). If workers are at the work site at the time their illness, symptoms or exposure are disclosed, arrangements will be made to safely transport them to their homes or other location where they can self-isolate.

7.3 Return to Work

Workers in self-isolation should remain in regular contact with their supervisors and provide notification of their expected return date as soon as possible. Workers returning to work will be subject to medical screening to verify that they can safely come back.

8. SANITATION & INFECTION CONTROL

XYZ Law Office will implement appropriate sanitary, cleaning and disinfection measures to minimize the risk of COVID-19 infection, including, at a minimum:

- Frequent and regular cleaning and disinfection of surfaces, equipment, door knobs, sinks, handles, keyboards, light switches and other touch points with products approved by the EPA;
- Keeping wash rooms accessible, clean and amply supplied with soap, water and paper towels;
- Requiring workers and other occupants to wash their hands frequently while they are present at and immediately before leaving the workplace;
- Posting signs demonstrating proper hand washing techniques in wash areas;
- Implementing safe work procedures to minimize and ensure the safe handling of mail, packages, materials and goods entering and exiting the workplace;
- Providing all workers clear COVID-19 infection control information and instruction;
- Requiring all workers to use “respiratory etiquette” and properly cover their mouth when they cough and sneeze;
- Disciplining workers who don’t follow proper cleanliness and hygiene requirements; and
- Furnishing and ensuring the proper use of PPE in accordance with Section 9 below.

In addition to the above, XYZ Law Office will consider and adopt other sanitation and hygiene measures to control COVID-19 infection risks that it deems reasonably practicable, which may include:

- Installation or refitting of ventilation, air circulating and HVAC systems or equipment;
- Providing sanitizer dispensers at office entrances and common areas;
- Ensuring ample supplies of hand sanitizing wipes to workers for use at their own work stations;
- Removing doors from hinges;
- Banning workers from sharing tools or equipment;
- Removing or restricting use of shared equipment like drinking fountains, coffee machines, kettles, microwaves, fridges, vending machines, water coolers, photocopiers, fax machines and printers; and

- Establishing “cough safe areas” in locations where people can cough or sneeze without exposing others to infection risks.

9. PPE

When COVID-19 hazards cannot be eliminated or controlled by engineering and/or administrative measures alone, all persons will be required to use appropriate PPE depending on the exposure level assigned to their job classification in accordance with Section 3.1 above.

Job Classification	Required PPE
Very High + High (mostly health care workers, EMTs, ambulance and medical support staff)	N95 particulate filtering masks + protective gloves + aprons at a minimum (more extensive protection such as face shields, goggles, SCBA respirators may also be required)
Medium + Low (vast majority of workers)	Non-medical face masks + protective gloves

XYZ Law Office will furnish all required PPE to workers at no cost to them and ensure that the PPE:

- Is properly used, stored and maintained in accordance with the manufacturer’s instructions;
- Properly fits the worker, including by fit testing workers required to use tight-fitting masks that rely on an effective seal;
- Is safely discarded if it’s disposable or is properly cleaned and disinfected if it’s designed for reuse; and
- Is not shared with any other person.

10. SAFETY INFORMATION & TRAINING

All workers at risk of exposure will receive COVID-19 safety information and training covering, at a minimum:

- How the virus spreads;
- The fact that there is currently no vaccine for COVID-19;
- How to reduce the risk of infection;
- The measures taken by XYZ Law Office to minimize infection risks; and
- What to do and who to call if they believe they have been exposed.

11. POSTING

XYZ Law Office will post a copy of this Plan on its website and in the workplace in one or more conspicuous locations where all workers will be able to see it.