**Injury and Illness Prevention Program**

**COVID-19 Supplement**

**Instructions**

On May 14, 2020, Cal/OSHA revised the [Interim General Guidelines on Protecting Workers from COVID-19](https://www.dir.ca.gov/dosh/coronavirus/General-Industry.html). The new guideline outlines **mandatory** control measures most California employers must implement and document within their written Injury & Illness Prevention Program (IIPP).

All California employers are required to establish and implement an IIPP ([Title 8 Section 3203](https://www.dir.ca.gov/title8/3203.html)) to protect employees from workplace hazards. Under the hazard assessment requirement, employers are required to determine if COVID-19 infection is a hazard in their workplace. If it is a workplace hazard, then employers must implement infection control measures, including applicable and relevant recommendations from the Centers for Disease Control and Prevention (CDC).

This sample COVID-19 IIPP Supplement includes the infection prevention measures outlined in the Cal/OSHA guidance posted on May 14, 2020. There are several areas in the supplement that will need to be modified or customized, which will be indicated by BLUE TEXT.

***Important Note:***

*The COVID-19 IIPP Supplement does not replace the requirements in the Cal/OSHA Aerosol Transmissible Diseases (ATD) Standard (*[*Title 8 Section 5199*](https://www.dir.ca.gov/title8/5199.html)*) for covered employees. In general, covered employees for our clients include emergency medical services, medical transport services, certain police services, correctional facilities, and homeless shelters. The regulation provides a complete list of covered employees.*

*Review the regulation for a complete list of covered employees and any current interim compliance guidance on the Cal/OSHA website for further information.*

**Name of Entity**

**IIPP - COVID-19 Supplement**

**Date**

# Policy

This COVID-19 IIPP Supplement has been established in accordance with the Cal/OSHA [Interim General Guidelines on Protecting Workers from COVID-19](https://www.dir.ca.gov/dosh/coronavirus/General-Industry.html) and the Injury & Illness Prevention Program ([Title 8 Section 3203](https://www.dir.ca.gov/title8/3203.html)) requirements.

Under the IIPP hazard assessment requirements, it has been determined exposure to the COVID-19 virus is a potential hazard in our workplace. Therefore, infection control measures as directed in the Cal/OSHA mandatory guidance have been developed and implemented.

# Responsibilities

NAME OF PERSON/JOB TITLE has the authority and responsibility for:

* Implementing the infection control measures as outlined in this supplement
* Ensuring the outlined sanitation and disinfection efforts are conducted
* Conducting regular inventories to ensure all needed supplies and personal protective equipment (PPE) are available
* Making certain COVID-19 training (as outlined in the training section) is conducted and documented for all employees
* Ensuring our entity is aware of, and complying with, the COVID-19 employee requirements in the [Families First Coronavirus Response Act](https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave)

**Managers & Supervisors**

Managers and supervisors are responsible for implementing and maintaining the infection control measures in their work areas. They are responsible for answering employee questions and setting a good example by following the guidance in this supplement.

**Employees**

All employees are responsible for understanding and following the infection control measures and for asking questions when direction is unclear. Employees are expected to report any unsafe conditions to their supervisor.

*Once you’ve reviewed this section consider if any other responsibilities need to be added or modified. For example, if your safety committee, HR department, emergency response team, or any other group are playing a role in the COVID-19 response add their responsibilities.*

# Compliance

Our primary goal is to prevent the spread of COVID-19 and protect our employees. All managers, supervisors, and employees are required to strictly adhere to all the outlined infection control measures in this supplement. Our compliance measures include, but are not limited to, the following:

* Informing employees of these requirements in a readily understandable language
* Training all employees on the infection control measures
* Disciplining employees for failure to comply with the requirements in this supplement

# Communication

All employees will be trained on the infection control measures in a form readily understandable by all. Our communication system encourages all employees to inform their managers and supervisors of any unsafe working conditions without fear of reprisal. Employees can report COVID-19 specific or any workplace hazards anonymously by ENTER SPECIFIC INSTRUCTIONS.

# Hazard Assessment & Infection Control Measures

The IIPP regulation requires us to conduct a hazard assessment to identify, evaluate, and implement control measures whenever we are made aware of a new or previously unrecognized hazard. It has been determined that exposure to the COVID-19 virus is a potential hazard in our workplace. Therefore, infection control measures as directed in the Cal/OSHA mandatory guidance have been developed and implemented.

*If your entity has already developed written procedures that include the infection control measures outlined below, consider including the location of these procedures in this section.*

# Infection Control Measures

**Administrative Controls**

* All sick employees will be actively encouraged to stay home.
* Employees will be immediately sent home or to medical care, as needed, if they have a frequent cough, fever, difficulty breathing, chills, muscle pain, headache, sore throat, or recent loss of taste or smell.
* Employees who are out ill with fever or acute respiratory symptoms are not allowed to return to work until both of the following occur:
  + At least three full days pass with no fever (without the use of fever-reducing medications) and no acute respiratory illness symptoms; and
  + At least 10 days pass since the symptoms first appeared.
* Employees who return to work following an illness are required to report any recurrence of symptoms.
* Teleworking options will be supported where feasible. ADD TELEWORKING OPTIONS IF AVAILABLE.
* Employees will be advised of any non-essential travel requirements. INCLUDE TRAVEL LIMITATIONS IF KNOWN.

**Physical Distancing**

* Physical distancing will be practiced by cancelling in-person meetings and using video or telephonic meetings when possible.
* A distance of at least 6 feet between persons will be maintained at the workplace when possible.
* Shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools and equipment) will be avoided when possible. If workspaces and work items must be shared, they will be cleaned and disinfected before and after use.

**Face Covering**

Employees will be provided with cloth face covers or encouraged to use their own face covers whenever they may be in workplaces with other persons. Cloth face coverings are not PPE, but combined with physical distancing of at least six feet, they may help prevent infected persons without symptoms from unknowingly spreading COVID-19.

**Cleaning & Disinfection**

Procedures have been established to routinely clean and disinfect commonly touched objects and surfaces such as elevator buttons, handrails, copy machines, faucets, and doorknobs. Surfaces are cleaned with soap and water prior to disinfection. These procedures should include:

* Using disinfectants that are [EPA-Approved](https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2) for use against the virus that causes COVID-19.
* Providing EPA-registered disposable wipes for employees to wipe down commonly used surfaces before use.
* Following the manufacturer’s instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time).
* Ensuring there are adequate supplies to support cleaning and disinfection practices.

**Confirmed Cases of Employee Exposure to COVID-19**

If an employee is confirmed to have COVID-19 infection, the following measures will take place:

* Inform employees of their possible exposure to COVID-19 in the workplace, but maintain confidentiality as required by the Americans with Disabilities Act (ADA) and the California Department of Fair Employment and Housing.
* Temporarily close the general area where the infected employee worked until cleaning is completed.
* Conduct deep cleaning of the entire general area where the infected employee worked and may have been, including breakrooms, restrooms and travel areas, with a cleaning agent approved for use by the EPA against coronavirus. Ideally, the deep cleaning should be performed by a professional cleaning service.
  + Any person cleaning the area will be equipped with the proper PPE for COVID-19 disinfection (disposable gown, gloves, eye protection, mask, or respirator if required) in addition to PPE required for cleaning products.

**Engineering Controls for Customer Service Areas**

For employees who have frequent contact with the public, the following measures will be implemented that take into account the possibility that the public is a possible contamination source, including:

* Conducting even more frequent cleaning and disinfection of surfaces touched by the public such as credit card machines, touch screens, doorknobs, etc.
* Where feasible, employees who have frequent interaction with the public will be protected with engineering controls such as Plexiglas screens, tables or other physical barriers, or spatial barriers of at least six feet.
* If exposures to the general public cannot be eliminated with engineering controls, customers will be required or encouraged to wear face coverings and physical distancing.
* Hand sanitizer stations will be provided, and employees will be encouraged to frequently wash their hands with soap and water for 20 seconds.
* Physical distancing will be enforced by limiting the number of customers in the space, where feasible.
* Disposable gloves will be provided to employees who handle items touched by the public.

# Hazard Correction

Any reported COVID-19 related unsafe or unhealthy work conditions, practices, or procedures will be investigated and, if warranted, corrected in a timely manner.

# Accident/Incident Investigations

Accident/incident investigations, for potentially work-related COVID 19 illnesses, will be conducted as required by Cal/OSHA.

*Cal/OSHA’s reporting requirements are outlined at* [*https://www.dir.ca.gov/dosh/coronavirus/Reporting-Requirements-COVID-19.html*](https://www.dir.ca.gov/dosh/coronavirus/Reporting-Requirements-COVID-19.html)*.*

*Cal/OSHA’s Q&A on Executive Order N-62-20 is available at* [*https://www.dir.ca.gov/dwc/Covid-19/FAQs.html*](https://www.dir.ca.gov/dwc/Covid-19/FAQs.html)

# Training

All employees will receive training in a language that is readily understandable to them. Training will include a review of this IIPP - COVID-19 Supplement and the following topics:

* General description of COVID-19, symptoms, when to seek medical attention, how to prevent its spread, and the employer’s procedures for preventing its spread at the workplace.
* How an infected person can spread COVID-19 to others even if they are not sick.
* How to prevent the spread of COVID-19 by using cloth face covers, including:
  + CDC guidelines that everyone should use cloth face covers when around other persons.
  + How cloth face covers can help protect persons around the user when combined with physical distancing and frequent hand washing.
  + Information that cloth face covers are not protective equipment and do not protect the person wearing a cloth face cover from COVID-19.
  + Instructions on washing and sanitizing hands before and after using face coverings, which should be washed after each shift.
* Cough and sneeze etiquette.
* Washing hands with soap and water for at least 20 seconds after interacting with other persons and after contacting shared surfaces or objects.
* Avoiding touching eyes, nose, and mouth with unwashed hands.
* Avoiding sharing personal items with co-workers (i.e., dishes, cups, utensils, towels).
* Providing tissues, no-touch disposal trash cans, and hand sanitizer for use by employees.
* Safely using cleaners and disinfectants, which includes:
  + The hazards of the cleaners and disinfectants used at the worksite.
  + Wearing PPE (such as gloves).
  + Ensuring cleaners and disinfectants are used in a manner that does not endanger employees.

# Record Keeping

All COVID-19 related training records, inspections, and investigations will be maintained as outlined in our IIPP Recordkeeping section.