

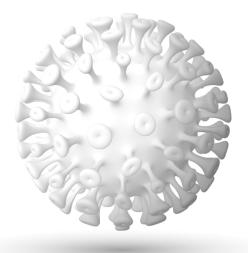


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Introduction



Unlike natural disasters or terrorist events, a pandemic will be widespread, affecting multiple areas of the United States and other countries at the same time. A pandemic will also be an extended event, with multiple waves of outbreaks in the same geographic area; each outbreak could last from 6 to 8 weeks. Waves of outbreaks may occur over a year or more.

COVID-19, like any other virus, spreads more quickly when people are close, such as within 6 feet of one another. Microbial Aerosols can become an issue during a pandemic when employees work together in small working groups, clusters, or on projects in small conference rooms.

Several employees working in small areas may accelerate employees getting sick faster and at a higher rate. Also, workers in open office spaces take more sick days than people in enclosed offices, so the company's work environment can contribute to the risk of pathogen transmission.

Your company may also be affected by local quarantines, travel controls and restrictions, and limitations on public assemblies. Public transportation may be closed or limited. These indirect effects will likely cause most of the economic damages.

Your workflow may also be affected even if your employees are healthy, as they take time to care for sick family members.

The guidelines listed in this plan highlight steps a small business should take to help mitigate the inherent risks during a pandemic.



1.0 Immediate Steps

- Tell sick employees to stay home.
 Businesses that do not offer paid sick leave should consider temporarily offering sick leave.
- Identify critical employee groups, such as the shipping department, or the payment processing team, or any functions that the company absolutely must have to operate every day. Then consider whether employees can cover some of these functions at a different location. For example, is it possible for one regional office to provide service to another office whose employees are sick?
- Identify employees with critical skills who are not easily replaced on short notice. Look for others who could learn the task, recent retirees, or consider an outsourcing plan.

- Ensure that work-at-home systems are running well, which includes computer security. Be aware of scam emails that tell an employee to send a payment to a new supplier. With many people working at home, businesses need protocols for phone conversations to limit this risk.
- Talk to critical suppliers of both goods and services about their ability to deliver reliably. Have a dialog with them and set up alternative suppliers if needed.
- Plan for closing. You may have to close some of your locations temporarily or permanently. Think through security and equipment maintenance issues ahead of time.





2.0 Protect Your Employees

During a pandemic, it is essential to identify the type of risk your employees face in your industry. Educate and train employees in proper hand hygiene, cough etiquette, and social distancing techniques and understand and develop work practice and engineering controls that could provide additional protection to your employees.

While these are not comprehensive recommendations, the most important part of pandemic planning is to work with your employees, local and state agencies, and other employers to develop cooperative pandemic plans to maintain your operations and keep your employees and the public safe.

2.1 Classifying Employee Exposure to Pandemic Influenza at Work

To help employers determine appropriate work practices and precautions and how to protect your employees, OSHA has divided workplaces and work operations into four risk zones, according to the likelihood of employees' occupational exposure to the pandemic virus.



Occupational Risk Pyramid for Pandemic Influenza

Occupational Risk Pyramid https://www.osha.gov/Publications/influenza_pandemic.html

These zones are shown in the shape of a pyramid to represent how the risk will likely be distributed. The vast majority of American workplaces are likely to be in the medium exposure risk or lower exposure risk (caution) groups.

Very High Exposure Risk: Healthcare employees (for example, doctors, nurses, dentists)
performing aerosol-generating procedures on known or suspected pandemic patients
(for example, cough induction procedures, bronchoscopies, some dental procedures, or
invasive specimen collection). Health and laboratory professions (for example,



workers that collect or handle specimens from known or suspected patients and manipulate cultures from known or suspected pandemic influenza patients).

- High Exposure Risk: Healthcare delivery and support staff exposed to known or suspected pandemic patients (for example, doctors, nurses, nursing home and other hospital staff that must enter patients' rooms). Staff involved in the medical transport of known or suspected pandemic patients in enclosed vehicles (for example, emergency medical technicians). Staff performing autopsies on known or suspected pandemic patients (for example, morque and mortuary employees).
- Medium Exposure Risk: Employees with high-frequency contacts with the general population (for example, pharmacies, schools, grocery stores, high population density work environments, and other high volume retail).
- Lower Exposure Risk (Caution): Employees who have minimal occupational contacts with the general public and other coworkers (for example, office employees).

Employers of critical infrastructure and key resource employees (such as law enforcement, emergency response, or public utility employees) may consider upgrading protective measures for employees beyond what would be suggested by their exposure risk. The upgrade ensures critical equipment is available during any type of outbreak shortage and makes certain essential functions of society are not interrupted.



** Actual Federal, State, and Local assessment for risk exposure during a pandemic may differ.



2.2 Educate and Train Your Employees

According to the CDC, COVID-19 is primarily spread by close contact and touching infected surfaces. Consider training your employees with the following best practices:

- Ask your employees to stay home if they are feeling ill.
- Use hand sanitizer with at least 60 percent alcohol and disinfectant wipes at public facilities.
- Avoid face, nose, mouth, and eyes touching. The thin membranes in the mouth, nose, and eyes may easily transmit the virus into the body after touching an infected surface.
- To kill germs, infectious-disease experts recommend washing with soap and water for at least 20 seconds and use special care to wash between your fingers. Dry your hands with a paper towel, then use the towel to shut off the faucet and open the bathroom door.











- Use good cough/sneeze etiquette. Turn your head and cough or sneeze into a
 disposable tissue or the inside of your elbow if no tissue is available. Don't cough or sneeze
 into your hands. Dispose of the tissue and wash your hands or use hand sanitizer
 immediately. Place all contaminated disposable items in lined containers before
 disposing of them with other household waste. The clothing on your elbow will contain an
 infectious virus that can be passed on for up to a week or more.
- Promote healthy lifestyles, including good nutrition, exercise, and smoking cessation. A
 person's overall health impacts their body's immune system and can affect their ability to
 fight off, or recover from, an infectious disease.
- Employees should avoid close contact with their coworkers and customers (maintain a separation of at least 6 feet). They should avoid shaking hands and always wash their hands after contact with others. Even if employees wear gloves, they should wash their hands upon removal of the gloves in case their hand(s) became contaminated during the removal process.
- Keep work surfaces, telephones, computer equipment, and other frequently touched surfaces and office equipment clean. Be sure that any cleaner used is safe and will not harm your employees or your office equipment. Use only disinfectants registered by the U.S. Environmental Protection Agency (EPA) and follow all directions and safety precautions indicated on the label.



• Discourage your employees from using other employees' phones, desks, offices, or other work tools and equipment.



 Reducing or eliminating unnecessary social interactions can be very effective in controlling the spread of infectious diseases. Reconsider all situations that permit or require employees, customers, and visitors (including family members) to enter the workplace. Workplaces that allow family visitors on site should consider restricting or eliminating that option during a pandemic. Worksites with on-site daycare should consider in advance whether these facilities will remain open or closed and the impact of such decisions on employees and the business.



The CDC states that the virus is thought to spread mainly from person-to-person and primarily between people who are in close contact with one another (within about 6 feet). It is thought that one can infect other via respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.



Secondly, this virus can be spread from contact with infected surfaces or objects. It may be possible for a person to get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes; however, this is not thought to be the main way the virus spreads.



2.3 Hierarchy of Controls & Intervention Strategies

Occupational safety and health professionals use a framework called the "hierarchy of controls" to select ways of dealing with workplace hazards. The hierarchy of controls prioritizes intervention strategies based on the premise that the best way to control a hazard is to systematically remove it from the workplace rather than relying on employees to reduce their exposure.

In the setting of a pandemic, this hierarchy should be used in concert with current public health recommendations.

The types of measures that may be used to protect yourself, your employees, and your customers (listed from most effective to least effective) are engineering controls, administrative controls, work practices, and personal protective equipment (PPE). Most employers will use a combination of control methods. There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. For example, hygiene and social distancing can be implemented relatively easily and with little expense, but this control method requires employees to modify and maintain their behavior, which may be difficult to sustain.

On the other hand, installing clear plastic barriers or a drive-through window will be more expensive and take a longer time to implement, although in the long run may be more effective at preventing transmission during a pandemic. Employers must evaluate their particular workplace to develop a plan for protecting their employees that may combine both immediate actions as well as longer-term solutions.

- Engineering Controls involve making changes to the work environment to reduce
 work-related hazards. These types of controls are preferred over all others because they
 make permanent changes that reduce exposure to hazards and do not rely on
 employee or customer behavior. By reducing a hazard in the workplace, engineering
 controls can be the most cost-effective solutions for employers to implement.
 - During a pandemic, engineering controls such as clear plastic sneeze guard, drivethrough windows, and specialized negative pressure ventilation may be effective in reducing exposure to some sources of pandemic viruses and not others.
- Administrative Controls include controlling employees' exposure by scheduling their work tasks in ways that minimize their exposure levels. Some examples of administrative controls include:
 - o Developing policies that encourage ill employees to stay at home without fear of any reprisals, including updating sick leave policies or other benefits.
 - o Considering practices to minimize face-to-face contact between employees, such as email, websites, and teleconferences. Where possible, encourage flexible work arrangements such as telecommuting or flexible work hours to reduce the number of your employees who must be at work at one time or in one specific location.

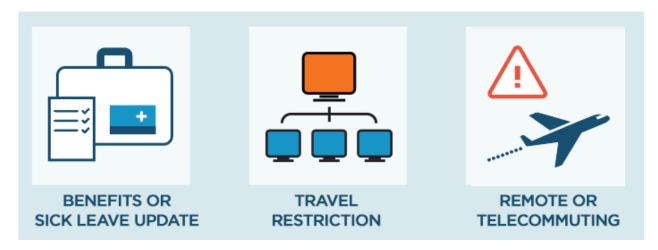


 The discontinuation of unessential travel to locations with high illness transmission rates.

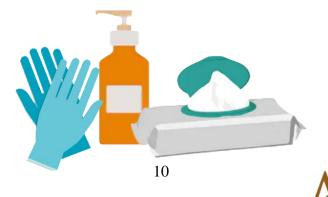
Note: The U.S. Department of State has asked its embassies and consulates to consider preparedness measures that take into consideration the fact that travel into or out of a country may not be possible, safe, or medically advisable during a pandemic. Embassy stocks cannot be made available to private American citizens abroad; therefore, employers and employees are encouraged to prepare appropriately. It is also likely that governments will respond to a pandemic by imposing public health measures that restrict domestic and international movement, further limiting the U.S. government's ability to assist Americans in these countries. As these measures may be implemented very quickly, it is important that employers and employees plan appropriately.

More information on pandemic influenza planning for employees living and traveling abroad can be found at:

- www.pandemicflu.gov/travel/index.html
- www.cdc.gov/travel
- www.state.gov/travelandbusines



Work Practice Controls - Providing resources and a work environment that promotes
personal hygiene. For example, provide tissues, no-touch trash cans, hand soap, hand
sanitizer, disinfectants, and disposable towels for employees to clean their work
surfaces.



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Personal Protective Equipment (PPE) - While administrative and engineering controls
and proper work practices are considered to be more effective in minimizing exposure
to the virus, the use of PPE may also be indicated during specific exposures. If used
correctly, PPE can help prevent some exposures; however, they should not take the
place of other prevention interventions, such as engineering controls, cough etiquette,
and hand hygiene (see www.cdc.gov/flu/protect/stopgerms.htm).

Examples of personal protective equipment are gloves, goggles, face shields, surgical masks, and respirators (for example, N-95). Employers are obligated to provide their employees with the protective gear needed to keep them safe while performing their jobs. The types of PPE recommended for a pandemic will be based on the risk of contracting the virus while working and the availability of PPE. Check the www.pandemicflu.gov website for the latest guidance. Personal protective equipment must be:

- Selected based upon the hazard to the employee
- Properly fitted and some must be periodically refitted
- Conscientiously and properly worn
- Regularly maintained and replaced, as necessary
- Properly removed and disposed of to avoid contamination of self, others, or the environment.

It is important that employers and employees understand the significant differences between these types of personal protective equipment. The decision on whether or not to require employees to use either surgical/procedure masks or respirators must be based upon a hazard analysis of the employees' specific work environment and the different protective properties of each type of personal protective equipment.

A NOTE ON FACE MASKS: February 29, 2020



Unless hazard analysis of an employee's specific work environment requires the use of face mask, the US Surgeon General Dr. Jerome Adams, urged the public to stop buying masks, warning that it won't prevent the spread of the coronavirus but will take away important resources from health care professionals.

"They are NOT effective in preventing general public from catching #Coronavirus, but if health care providers can't get them to care for sick patients, it puts them and our communities at risk!"



3.0 Business Continuity

To reduce the impact of a pandemic on your operations, employees, customers, and the general public, it is important for all businesses and organizations to begin continuity planning for a pandemic now. Lack of continuity planning can result in a cascade of failures as employers attempt to address the challenges of a pandemic with insufficient resources and employees who might not be adequately trained. Proper planning will allow employers to protect their employees better and prepare for changing patterns of commerce and potential disruptions in supplies or services. Important tools for pandemic planning for employers are located at www.pandemicflu.gov.

Immediate possible impacts include:

- Absenteeism A pandemic could affect as many as 40-percent of the workforce during periods of peak influenza illness. Employees could be absent because they are sick, must care for sick family members, must stay home for their children if schools and daycare centers are closed, are afraid to come to work, or have had a death in the family.
- Change in patterns of commerce During a pandemic, consumer demand for items related to infection control is likely to increase dramatically, while consumer interest in other goods may decline. Consumers may also change how they shop as a result of the pandemic. Consumers may try to shop at off-peak hours to reduce contact with other people, show increased interest for home delivery services, or prefer other options, such as drive-through services, to reduce person-to-person contact.
- **Interrupted supply and delivery** Shipments of items from geographic areas severely affected by the pandemic may be delayed or canceled.

The U.S. government has placed a special emphasis on supporting pandemic planning for public and private sector businesses deemed to be **critical industries** and **key resources** (CI/KR).

- Critical industries include sectors that provide the production of essential goods and services, interconnectedness and operability, public safety, and security that contribute to a strong national defense and thriving economy.
- Key resources are facilities, sites, and groups of organized people whose destruction could cause large-scale injury, death, or destruction of property or profoundly damage our national prestige and confidence.

With 85 percent of the nation's critical infrastructure in the hands of the private sector, the business community plays a vital role in ensuring national pandemic preparedness and response. Find additional guidance for CI/KR business at www.pandemicflu.gov/plan/pdf.



3.1 Maintain Operations During a Pandemic

As an employer, you have an important role in protecting employee health and safety and limiting the impact of an influenza pandemic. It is important to work with community planners to integrate your pandemic plan into local and state planning, particularly if your operations are part of the nation's critical infrastructure or key resources. Integration with local community planners will allow you to access resources and information promptly to maintain operations and keep your employees safe.

Administration and Human Resource Management

- Develop a Disaster Plan Develop a disaster plan that includes pandemic preparedness (See www.pandemicflu.gov/plan/businesschecklist.html) and review it and conduct drills regularly.
- Be aware of and review federal, state, and local health department pandemic plans.
 Incorporate appropriate actions from these plans into workplace disaster plans.
- Develop a sick leave policy that does not penalize sick employees, thereby encouraging employees who have pandemic related symptoms (e.g., fever, headache, cough, sore throat, runny or stuffy nose, muscle aches, or upset stomach) to stay home so that they do not infect other employees. Recognize that employees with ill family members may need to stay home to care for them.
- Recognize that, in the course of normal daily life, all employees will have nonoccupational risk factors at home and in community settings that should be reduced to
 the extent possible. Some employees will also have individual risk factors that should be
 considered by employers as they plan how the organization will respond to a potential
 pandemic (e.g., immuno-compromised individuals and pregnant women).
- Assist employees in managing additional stressors related to the pandemic. These are likely to include distress related to personal or family illness, life disruption, grief related to loss of family, friends or coworkers, loss of routine support systems, and similar challenges. Assuring timely and accurate communication will also be important throughout the duration of the pandemic in decreasing fear or worry. Employers should provide opportunities for support, counseling, and mental health assessment and referral should these be necessary. If present, Employee Assistance Programs can offer training and provide resources and other guidance on mental health and resiliency before and during a pandemic.
- Plan for downsizing services but also anticipate a scenario that may require a surge in your services.



Operations - Employee Training, Education and Management

- Identify possible exposure and health risks to your employees. Are employees potentially in contact with people with the illness such as in a hospital or clinic? Are your employees expected to have much contact with the general public?
- Provide your employees and customers in your workplace with easy access to infection control supplies, such as soap, hand sanitizers, personal protective equipment (such as gloves or surgical masks if required), tissues, and office cleaning supplies.
- Identify business-essential positions and people required to sustain business-necessary
 functions and operations. Prepare to cross-train or develop ways to function in the
 absence of these positions. It is recommended that employers train three or more
 employees to be able to sustain business-necessary functions and operations and
 communicate the expectation for available employees to perform these functions if
 needed during a pandemic.
- Develop policies and practices that distance employees from each other, customers, and the general public. Consider methods to minimize face-to-face contact between employees, such as email, websites, and teleconferences. Policies and practices that allow employees to work from home or to stagger their work shifts may be important as absenteeism rises.
- Provide training, education, and informational material about business-essential job
 functions and employee health and safety, including proper hygiene practices and the
 use of any personal protective equipment to be used in the workplace. Be sure that
 informational material is available in a usable format for individuals with sensory
 disabilities or limited English proficiency. Encourage employees to take care of their
 health by eating right, getting plenty of rest, and getting a seasonal flu vaccination.

Equipment

• Stockpile items such as soap, tissue, hand sanitizer, cleaning supplies, and recommended personal protective equipment. When stockpiling items, be aware of each product's shelf life and storage conditions (e.g., avoid areas that are damp or have temperature extremes) and incorporate product rotation (e.g., consume oldest supplies first) into your stockpile management program.

Communication

 Organize and identify a central team of people or a focal point to serve as a communication source so that your employees and customers can have accurate information during the crisis.



• Minimize exposure to fellow employees or the public. For example, will more of your employees work from home? If so, this may require the enhancement of technology and communications equipment.

Supply Chain and Strategic Business Partners

- Work with your suppliers and business partners to ensure that you can continue to operate and provide services.
- Work with your employees and, if applicable, their union(s) to address leave, pay, transportation, travel, childcare, absence, and other human resource issues.
- Work with your insurance companies and state and local health agencies to provide information to employees and customers about medical care in the event of a pandemic.

4.0 Resources and More Information

Federal, state, and local government agencies are your best source of information should a pandemic take place. It is essential to stay informed about the latest developments and recommendations since specific guidance may change based upon the characteristics of the eventual pandemic virus strain (for example, the severity of the disease, the importance of various modes of transmission).

Below are several recommended websites that you can rely on for the most current and accurate information:

- www.pandemicflu.gov (Managed by the Department of Health and Human Services; offers one-stop access, including toll-free phone numbers, to U.S. government avian and pandemic flu information.)
- www.osha.gov (Occupational Safety and Health Administration website)
- www.cdc.gov/niosh (National Institute for Occupational Safety and Health website)
- www.cdc.gov (Centers for Disease Control and Prevention website)
- www.fda.gov/cdrh/ppe/fluoutbreaks.html (U.S. Food and Drug Administration website)



