

A & L Cesspool Service Corp.

Infectious
Disease Safety
Program (IDSP)

May 19

2020

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PROGRAM OVERVIEW

POLICY

Infectious diseases such as COVID-19 represent a serious health and safety threat to our employees, our clients, and the public. It is the policy of the company to employ comprehensive measures to address these issues and concerns.¹

OBJECTIVES

- 1) Identify hazards.
- 2) Identify regulatory standards.
- 3) Create a program that addresses hazards and standards.
- 4) Identify affected personnel.
- 5) Acquire appropriate equipment.
- 6) Train and perform to standard.
- 7) Evaluate performance and standards honestly and objectively.
- 8) Monitor compliance and correct deficiencies.
- 9) Maintain records, issue timely notifications and reports.

COSTS

Affected (Enrolled) Personnel: Costs related to company approved, selected, and acquired training, medical services, and equipment, for those affected/enrolled in the program who remain compliant are free.

Non-affected (Non-enrolled) Personnel: Those non-affected/non-enrolled who wish to voluntarily engage in certain aspects of the program may be eligible to do so, however, they may not be able to enroll cost-free. These personnel must obtain written approval from the safety coordinator for cost-free participation.

Costs which have not been pre-approved in writing, or costs associated with non-compliance, illegal activity, voluntary actions, activities, or purchases, or costs which are covered under “free or no-cost services” are not covered under this program and will not be reimbursed by the company. See the Safety Coordinator for a list of free services related to COVID testing and treatment.

REGULATORY REFERENCES

- 1) U.S. Department of Labor: OSHA: Healthcare: Infectious Diseases.
- 2) U.S. Department of Labor: OSHA: COVID-19.
- 3) U.S. Department of Labor: OSHA: COVID-19: Standards.
- 4) U.S. Department of Health and Human Services: CDC: Definitions of Symptoms for Reportable Illnesses.
- 5) U.S. Department of Health and Human Services: CDC: Specific Laws and Regulations Governing the Control of Communicable Diseases.
- 6) U.S. Department of Health and Human Services: CDC: Coronavirus Disease 2019 (COVID-19)
- 7) N.Y.S. Department of Health policies and procedures, and Executive Orders.
- 8) N.Y.C. Department of Health policies and procedures, and Executive Orders.

¹ Bloodborne pathogens are covered in the Confined Space Entry Program (CSEP) Bloodborne Addendum.

PROGRAM MANAGEMENT

PROGRAM MANAGER

The president of the company is the Program Manager and is responsible to:

- 1) Review applicable federal, state, and municipal guidelines.
- 2) Determine hazard assessment.
- 3) Identify affected personnel.
- 4) Assign and supervise the Program Coordinator.
- 5) Ensure appropriate resources are available for program implementation and success.
- 6) Enforce compliance.
- 7) Ensure record keeping and notifications are accurate and timely.

PROGRAM COORDINATOR

The safety coordinator is the Program Coordinator and is responsible to:

- 1) Create a safety program.
- 2) Incorporate applicable federal, state, and municipal guidelines into the program.
- 3) Incorporate hazard assessment mitigation into the program.
- 4) Notify and track affected personnel of program training and updates.
- 5) Coordinate the use of resources for program implementation and success.
- 6) Monitor compliance, enforce standards, report non-compliance, and evaluate program effectiveness.
- 7) Ensure record keeping and notifications are accurate and timely.

SUPERVISORS

Enrolled Supervisors are responsible to:

- 1) Lead by example and follow safety program guidelines.
- 2) Ensure subordinates and those under your supervision comply with safety program guidelines.
- 3) Become familiar with applicable federal, state, and municipal guidelines related to the program.
- 4) Immediately, without delay, notify the program manager or program coordinator of any suggestions or non-compliance.

AFFECTED PERSONNEL

ALL PERSONNEL ARE AFFECTED AND ARE REQUIRED TO ENROLL IN THIS SAFETY PROGRAM.

Enrolled personnel are responsible to:

- 1) Follow safety program guidelines.
- 2) Ensure you and your co-workers comply with safety program guidelines.
- 3) Become familiar with applicable federal, state, and municipal guidelines related to the program.
- 4) Immediately, without delay, notify the program manager or program coordinator of any illness, suggestion, or non-compliance.

HAZARD ASSESSMENT

OVERVIEW

The nature and locations of our company's work exposes our employees, clients, and the public to an increased risk of transmitting and contracting infectious diseases.

The primary routes of infectious disease transmission are **contact, droplet, and airborne**.

Contact transmission can be sub-divided into direct and indirect contact.

Direct contact transmission involves the transfer of infectious agents to a susceptible individual through physical contact with an infected individual (e.g., direct skin-to-skin contact).

Indirect contact transmission occurs when infectious agents are transferred to a susceptible individual when the individual makes physical contact with contaminated items and surfaces (e.g., doorknobs, patient-care instruments or equipment, bed rails, examination table).

Droplets containing infectious agents are generated when an infected person coughs, sneezes, or talks.

Transmission occurs when droplets generated in this way come into direct contact with the eyes, nose, or mouth of a susceptible individual. Droplets are too large to be airborne for long periods of time, and droplet transmission does not occur through the air over long distances.

Airborne transmission occurs through small particles or droplet nuclei that contain infectious agents and can remain suspended in air for extended periods of time. When inhaled by a susceptible individual, they enter the respiratory tract and can cause infection. Since air currents can disperse these particles or droplets over long distances, airborne transmission does not require face-to-face contact with an infected individual. Only a limited number of diseases are transmissible via the airborne route.

RISK ASSESSMENT

AFFECTED PERSONNEL ²		EXPOSURE AT	RISK DEMOGRAPHIC	TRANSMISSION THREAT TO	
Admin Grease Rodding Plant Pumping	Hospitals	Staff, Patients	You = HIGH	Them = HIGH	
	Nursing Homes, Schools	Ages < 6, = > 60 Pre-existing Respiratory Condition	You = MED	Them = HIGH	
	Crowded Facilities	Public, Clients	You = HIGH	Them = HIGH	
	Office's	Clients, Co-workers	You = MED	Them = MED	
	Restaurants	Public, Clients	You = MED	Them = MED	
	Open Areas with Distance	Public	You = LOW	Them = LOW	

² All Affected Personnel must be enrolled in this program.

BEST PRACTICES

PRE-OPERATIONS

ITEM	TASK	LIST	ENSURE
Clocking-in	Symptom Screening	See Dispatcher	<p>All employees are required to comply with a pre-workday/pre-clock-in symptom check³:</p> <p>1) Exposure Screening: Inquire if you have tested positive. And if so, when was the positive result acknowledged. Inquire or check if you are experiencing: cough, fever, shortness of breath, loss of appetite or smell), regardless of age, chronic conditions, or occupation. Inquire if you have had close contact with a confirmed COVID-19 patient or anyone that has experienced COVID-19 symptoms. Inquire if you are scheduled to work in a congregate residential setting (nursing home, shelter, or adult care facility), regardless of symptoms.</p> <p>2) Temperature Check: Physically (non-invasively) check your temperature with laser-type electronic thermometer.</p> <p>IF ANY OF 1) IS YES, OR IF 2) TEMPERATURE IS = > 100.4</p> <p>THEN EMPLOYEE IS CONSIDERED SYMPTOMATIC.</p> <p>EMPLOYEE CANNOT WORK WITHOUT PROVEABLE (IN WRITING) COVID NEGATIVE RESULTS OR WRITTEN MEDICAL APPROVAL TO WORK.</p> <p>The list of free testing and treatment centers in NYC are available from the safety coordinator.</p>

³ ALL EMPLOYEES must report to dispatcher prior to shift to have symptom check.

PPE	Check Basic Issue	See PPE Issue List	Present, Serviceable, Decontaminated
	Check IDSP Basic Issue	Mask (Disposable) ⁴ Disposable Gloves Hand Sanitizer Bootie Covers Area Sanitizer Area Wipes Pathogen Bucket	Present, Serviceable, Decontaminated
	Check IDSP Enhanced Issue	Chem Suit	Present, Serviceable, Decontaminated
Equipment	Check Serviceability	As per assignment	Present, Serviceable, Decontaminated
Vehicle	Interior	Areas previously touched	Decontaminated
Personal	Grooming	Hair (Head) Hair (Facial) Nails	So as not to interfere with PPE deployment Same Shortened, cleaned underside of nails
	Accessories	Glasses Jewelry	Decontaminated Best not worn, else decontaminated
	Clothing	Outerwear Innerwear	Clean, Serviceable

SERVICE OPERATIONS

TASK		PROCEDURE
Traveling	Wear mask	
At site	Social distance from the client where possible, Do not touch the client, Ensure IDSP PPE is used	
Pre-service	Wear IDSP PPE, Apply area sanitizer and wait 10 Min. (Do not over-saturate the area), Use Area Wipes to clean, Deposit wipes in Pathogen Bucket	
Service	Wear IDSP PPE, Touch only what you have pre-sanitized	
Post-service	Apply area sanitizer and wait 10 Min. (Do not over-saturate the area), Use Area Wipes to clean, Deposit wipes and disposable PPE in Pathogen Bucket, Apply IDSP Sticker to work ticket	

POST-OPERATIONS

ITEM	TASK	LIST	ENSURE
Service Equip.	As per assignment		Decontaminated
Personal	Groom	Hair (Head) Hair (Facial) Nails	So as not to interfere with PPE deployment Same Shortened, cleaned underside of nails

⁴ Any person wearing a Respirator with filters that require negative respiration, CANNOT WEAR the respirator (mask) unless they are enrolled in the Respiratory Protection Program (RPP).

	Clean Accessories	Glasses Jewelry	Decontaminated Best not worn, else decontaminated
	Clean Clothing	Outerwear Innerwear	Clean, Serviceable

TRAINING

FREQUENCY

Annual – Location/Date/Time (TBD)

OBJECTIVES

- 1) Train to regulatory standards.
- 2) Train to addresses hazards and standards.
- 3) Train to achieve certification.
- 4) Record and, if necessary, report results/certifications.

TOPICS

- 1) Regulatory Standards.
- 2) Types of Infectious Diseases.
- 3) Methods of Transmission or communication.
- 4) Best Practices and Prevention.
- 5) Identifying-Reporting Symptoms and Infection.
- 6) Testing and Work Requirements.
- 7) Medical Facilities and available Treatments.
- 8) Medical Records Privacy.

RESPONSIBILITIES

- 1) Scheduling (Date/Time/Location): Program Coordinator (PC)
- 2) Notification: PC
- 3) Topics: PC
- 4) Instruction: 3rd Party Instructor (3PI)
- 5) Monitoring: PC
- 6) Testing/Certification: 3 PI
- 7) Record Keeping: PC

RE-TRAINING

- 1) If there is a material change to standards, operations, or guidance.
- 2) If an employee changes position or employment circumstances change.
- 3) If an employee fails to perform to standard.

NON-CERTIFICATION

Failure to train to program standards, failure to gain necessary certification(s), failure to follow company or program guidelines, untruthfulness, or general malfeasance are non-compliance.

Employees that are non-compliant “CANNOT” and “WILL NOT” be allowed on any company site, property, or location and will be prohibited from clocking-in and working and will be prohibited from participating in any company sponsored event.

REPORTING – RECORD KEEPING

NOTIFICATION

If a worker tests positive for COVID-19, the program coordinator must immediately notify state and local health departments and cooperate with contact tracing efforts, including notification of potential contacts, such as workers or visitors who had close contact with the individual, while maintaining confidentiality required by state and federal law and regulations.⁵

If an employee tests positive for COVID-19, employers should inform employees that an employee has tested positive for COVID-19 but not reveal the identity of such employee. The company may notify affected employees in a way that does not reveal the personal health-related information of the infected employee.

Other than communicating the positive test result, the company may not, however, discuss the infected employee's health status with other employees. The company must maintain strict confidentiality of the infected employee's name and health condition.

REPORTING

While OSHA normally exempts employers from recording incidents of employees contracting "common colds and the flu" in the workplace, OSHA has made clear that COVID-19 does not meet this exemption.

Thus, COVID-19 may be a recordable illness if a worker is infected because of performing work-related duties. However, employers are only responsible for recording cases of COVID-19 if all the following are met:

- 1) The case is a confirmed case of COVID-19 (see CDC information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19⁶);
- 2) The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (e.g. medical treatment beyond first-aid, days away from work⁷).

Generally, an employer must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment unless an exception in § 1904.5(b)(2) specifically applies. Assuming the employer determines that the illness is recordable, then the affirmative reporting rule would also apply. In other words, employers are required to notify OSHA of a work-related fatality within eight hours or a work-related hospitalization, amputation, or loss of an eye within 24 hours

RECORDING

The following record keeping requirements for this program are:

- 1) Training, Results, and Certifications – 3 Years or regulatory minimum, whichever is longer.
- 2) Any medical related information – OSHA 300 FORMS INCLUDED - 3 Years or regulatory minimum, whichever is longer.

⁵ <https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/ConstructionShortGuidelines.pdf>

⁶ <https://www.cdc.gov/coronavirus/2019-ncov/php/reporting-pui.html>

⁷ https://www.osha.gov/recordkeeping/faqs/1904_preamble.html

SPECIAL CIRCUMSTANCE CLIENTS (SCC)

IDENTIFICATION

Special Circumstance Clients (SCC) are those clients that have special needs or requirements related to service. See table below for list and requirements.

SCC LIST

NAME	SPECIAL CIRCUMSTANCE	REFERENCE ⁸	ANY ADDITIONAL BENEFITS
NYC Board of Education	A specific set of guidelines must be followed to service their locations	Guidelines for Essential Vendor Services (05/08/20)	Prevailing Wage
Nursing Homes and similarly situated clients	Pre-entry testing must be conducted twice within 7 days of assignment. This testing is inconvenient, invasive, and potentially painful.	NYS Executive Order No. 202.30 (03/07/20)	Hazard Pay is available. Must get hazard pay approved in writing by President or Pit-tank manager "BEFORE" accepting service assignment.

⁸ See Program or Safety Coordinator for the complete list of special circumstances related to the listed entity.

REFERENCE ADDENDUM

REFERENCE	LINK
U.S. Department of Labor: OSHA: Healthcare: Infectious Diseases	https://www.osha.gov/SLTC/healthcarefacilities/infectious_diseases.html
U.S. Department of Labor: OSHA: COVID-19	https://www.osha.gov/SLTC/covid-19/
U.S. Department of Labor: OSHA: COVID-19: Standards	https://www.osha.gov/SLTC/covid-19/standards.html
C Specific Laws and regulations Governing the Control of Communicable Diseases	https://www.cdc.gov/quarantine/specifclawsregulations.html
U.S. Department of Health and Human Services: CDC: Coronavirus Disease 2019 (COVID-19)	https://www.cdc.gov/coronavirus/2019-ncov/communication/guidance-list.html?Sort=Date%3A%3Adesc
U.S. Department of Health and Human Services: CDC: Definitions of Symptoms for Reportable Illnesses	https://www.cdc.gov/quarantine/air/reporting-deaths-illness/definitions-symptoms-reportable-illnesses.html
N.Y.S. Department of Health policies and procedures, and Executive Orders.	https://coronavirus.health.ny.gov/home
N.Y.C. Department of Health policies and procedures, and Executive Orders.	https://www.macny.org/wp-content/uploads/2020/04/COVID-19-Government-Guidances_4-1-20.pdf
Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19), May 2020	https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html