

EXPOSURE CONTROL PLAN (ECP)

SAMPLE PROGRAM



Prepared by ESM Solutions, Inc.
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INSTRUCTIONS

1. Review Exposure Control Plan and amend to match your organization's policies and procedures
2. Finalize the ECP and review with Managers and Supervisors
3. Review Coronavirus Safety Tips (provided in English & Spanish) and amend to match your organization's policies and procedures
4. Provide Coronavirus training to all employees and obtain signatures using the attendance form.
5. Maintain signature pages for recordkeeping

ADDITIONAL RECOMMENDATIONS

1. Review your Company's bloodborne pathogens policy
2. Review your Company's work from home policy
3. Review your Company's travel policy

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Exposure Control Plan Overview

Communicable Diseases are infectious diseases such as Blood Borne Pathogens (BBP), spread through contact with blood and other potentially infectious materials, Aerosol Transmissible Diseases (ATD) which are spread through respiratory secretions when exhaled or expelled through coughing, sneezing, etc., and other infectious diseases which are spread through body contact, contact with infected body fluids, or through other vectors and means.

These infectious diseases are categorized by means of transmission:

- Those requiring direct contact precautions, such as hepatitis B virus, hepatitis C virus, and HIV/AIDS
- Those requiring airborne infection isolation, such as tuberculosis, SARS, smallpox, influenza and measles

The objective of this plan is to outline the requirements and procedures to reduce the potential for exposure to communicable diseases by developing and implementing effective controls and procedures for employees.

Policy

It is the policy of Our Company to provide a safe, healthy and secure workplace for all employees by implementing an effective Exposure Control Plan (ECP). Our ECP applies to employees that work in environments where their job tasks have the potential for communicable diseases exposures.

A. Responsibilities

Safety Manager

- Assists with developing a written program, which complies with Cal/OSHA standards
- Assists with providing training tools to all employees on the risks and control procedures of our ECP, including how to recognize communicable disease symptoms and proper response when they appear
- Identifies tasks and work environments where potential communicable disease exposures exist
- Identify all employees, vendors, and contractors who are required to work on tasks or in areas where there is an increased risk of exposure to communicable diseases
- Ensure effective processes and procedures are developed, implemented, and maintained in accordance with our ECP
- Shall be knowledgeable in infection control principles as they apply specifically to our facilities, services, and/or operations
- Works with managers, supervisors and employees to ensure this program is working effectively
- Stays apprised of public exposures and develops action plans and training to mitigate potential exposure

Department Managers, Supervisors & Leads

- Ensure that the requirements in this ECP are implemented
- Ensure that affected personnel are trained and follow control procedures outlined in this Plan
- Works with the Safety Manager to provide feedback on the implementation of this program and to ensure this program is working properly within their department

Affected Employees

- Complies with our Company's Exposure Control Plan
- Attend and understand training on communicable diseases

B. Transmission Control Procedures

Our Company will reduce the risk of transmission of aerosol transmissible disease (ATDs) and bloodborne pathogens (BBPs), to the extent possible, during the period an employee presenting an exposure risk or that requires isolation in our facility. These procedures may include:

- Utilizing universal precautions to prevent exposure to ATDs, or contact with BBPs and other

potentially infectious materials (OPIMs)

- Treating employees exhibiting flu-like symptoms as infectious
- Treating all blood and body fluids as infectious
- Ensuring safe needle and sharps handling and disposal
- Ensure safe handling of blood or OPIM specimens
 - All procedures involving blood or OPIM shall be performed to minimize splashing, spraying, splattering, and generation of droplets of these substances
- Utilizing personal hygiene practices such as thoroughly washing hands
- Utilizing personal protective equipment and respiratory protection requirements as needed
 - Employee use of effective respiratory protection
- Cleaning and decontaminating work areas, vehicles, and equipment that may become contaminated

C. Decontamination Procedures

An affected department shall ensure that the worksite is maintained in a clean and sanitary condition. The Safety Manager, in conjunction with the Department Managers, shall determine and implement appropriate methods and schedules for cleaning and decontamination of:

- Personal Protective Equipment
- Work uniforms (if applicable), or other clothing, if utilized as PPE
- Machinery, hand tools, workstations and other department related equipment
- Vehicles

For successful decontamination, the Safety Manager and the Department Manager will consider the following:

- Location within the facility
- The type of surface or equipment to be decontaminated
- The type of contamination
- Job tasks being performed in the department

All equipment and work surfaces shall be cleaned and decontaminated as soon as the exposure is known, including when:

- The work surfaces become contaminated
- A blood spill or OPIM
- There is exposure to a potential airborne contaminant

All cleaning materials must be disposed of in accordance with our bloodborne pathogens program, including:

- Contaminated personal protective equipment shall be handled as little as possible and bagged and prepared for decontamination
- All infectious or contaminated waste receptacles intended for reuse should be inspected for contamination and decontaminated prior to reuse
- Protective coverings used to cover equipment and surfaces shall be removed and replaced when contaminated

D. Medical Waste Disposal Procedures

Contaminated waste shall be handled, stored and disposed of all in accordance with all applicable federal, state and local regulations.

"Regulated Waste" means waste that is any of the following:

- Liquid or semi-liquid blood or OPIM
- Contaminated items that:
 - Contain liquid or semi-liquid blood, or are contaminated with dried blood or OPIM
 - Are capable of releasing these materials when handled or compressed
 - Are contaminated sharps
 - Are pathological and microbiological wastes containing blood or OPIM

Requirements for waste containers, include:

- All sharps containers for contaminated sharps shall be puncture resistant, leakproof on the sides and bottom, portable, if portability is necessary to ensure easy access and labeled in accordance.
 - Sharps containers must have the words "sharps waste" and/or the biohazard symbol and the word "BIOHAZARD"

- Waste not consisting of sharps shall:
 - Be disposed of in containers which are closable
 - Constructed to contain all contents and prevent leakage during handling, storage or transporting
 - Closed prior to removal to prevent spillage or protrusion of contents during handling, storage or transporting
- Waste containers shall be labeled:
 - Containers may be of any color and shall be labeled with the words “Biohazardous Waste”, the biohazard symbol or the word “BIOHAZARD” on the lid and on the sides
 - Potentially contaminated equipment and materials and contaminated waste containers shall be stored in designated areas away from any common areas, food handling or preparation areas.

Waste Container Storage Location	
Department 1:	
Location:	
Department 2:	
Location:	

E. Health, Housekeeping, and Hygiene Procedures

Our Company shall implement and enforce policies to prevent the spread of illnesses within the organization so as to provide a safe and healthful work environment, and to develop a system for ensuring that employees comply with safe and healthy work practices.

General CDC health hygiene best practices include:

- Employees who have symptoms of acute respiratory illness are recommended to stay home and not come to work until they are free of fever (100.4° +), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines
- Employees should notify their supervisor and stay home if they are sick or to stay at home to take care of a sick relative
- Employees who appear to have acute respiratory illness symptoms (i.e. cough, shortness of breath) upon arrival to work or become sick during the day will be separated from other employees and be sent home immediately
- Sick employees should cover their noses and mouths with a tissue when coughing or sneezing
- Use tissues and no-touch disposal receptacles
- Employees are recommended to clean their hands often with an alcohol-based hand sanitizer that contains at least 60-95% alcohol or wash their hands with soap and water for at least 20 seconds. Soap and water should be used preferentially if hands are visibly dirty
- Work policies and “stay at home” policies for employees with respiratory and viral illnesses, flu-like symptoms, and/or with open wounds will be considered
- Maintenance of company facilities in a healthy and clean condition to prevent the spread of illnesses, infections, and food borne illnesses
- Kitchens and eating areas must be cleaned after each use, and before each shift change
- If traveling:
 - Check the CDC’s Traveler’s Health Notices website for the latest guidance and recommendations for each country to which you will travel. Specific travel information for travelers going to and returning from China, and information for aircrew, can be found at on the CDC website
 - Check yourself for symptoms of acute respiratory illness before starting travel and notify your supervisor and stay home if you are sick
 - Employees who become sick while traveling or on temporary assignment should notify their supervisor and should promptly call a healthcare provider for advice if needed

F. Reporting

Employees are required to report all first aid incidents, including those involving the presence of blood or OPIM to their supervisor and/or safety manager immediately.

Additionally, employees that suspect there is a potential exposure to a communicable disease, must report the potential exposure to their supervisor and/or safety manager immediately.

Department Managers and/or the Safety Manager will then determine the appropriate decontamination procedures.

G. Personal Protective Equipment

Our company shall evaluate, identify, and provide personal protective and other equipment necessary to minimize employee exposure communicable diseases as needed.

H. Training

All employees with the potential for occupational exposure will be provided training on our Company's Exposure Control Plan.

- Training shall be provided at the time of initial assignment to tasks where occupational exposure may take place and at least annually thereafter
- For existing employees, training shall be provided within 90 days (3 months) of implementation of this ECP and at least annually thereafter
- Additional training shall be provided when there are changes in the workplace or when there are changes in procedures that could affect worker exposure

I. Recordkeeping

Our company will maintain training records, medical evaluation records, vaccination records, records of exposure incidents, Sharps Injury Logs, and records of inspection, testing, and maintenance of non-disposable engineering controls.

All records prepared in association with the Communicable Diseases Program shall be managed in accordance with our Injury & Illness Prevention Program.