**COVID – 19**

**Exposure Control Plan**

**GCSAA**

**2020**

Due to the Coronavirus Disease 2019 (COVID-19) Virus, Occupational Safety and Health Administration (OSHA) has issued guidance for preparing the workplace to deal with COVID-19.

Spread from China to other countries, including the Unites States, COVID-19 is a respiratory disease caused by the COVID-19 virus.

To reduce the impact of COVID-19 outbreak conditions on businesses, workers, customers, and the public, employers must plan now. OSHA developed COVID-19 planning guidance based on traditional infection prevention and industrial hygiene practices. It focuses on the need for employers to implement control measures – engineering, administrative, and work practice controls – as well as re-evaluate the protective abilities of personal protective equipment (PPE) already in use in the workplace.

For employers who already have a written Exposure Control Plan (ECP), planning for COVID-19 may involve updating plans to address the specific exposure risks, sources of exposure, routes of transmission, and other unique characteristics of COVID-19.

Employers should use this OSHA guidance to help identify risk levels in the workplace and to determine appropriate controls measures. The OSHA COVID-19 webpage offers information specifically for workers and employers: [www.osha.gov/covid-19](http://www.osha.gov/covid-19).

This guidance is advisory in nature and informational in content. It is not a standard or a regulation, and it neither creates new legal obligations nor alters existing obligations created by OSHA standards or the *Occupational Safety and Health Act* (OSH Act).

**How COVID-19 Spreads**

The virus is thought to spread mainly from person-to-person, including:

* Between people who are in close contact with one another (within 6 feet)
* Through respiratory droplets produced when an infected person coughs or sneezes
* It may be possible that a person can get COVID-19 by touching a surface or object that has COVID-19 on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the primary way the virus spreads

**Steps Employers Can Take to Reduce Workers’ Risk of Exposure to COVID-19**

Measures for protecting workers from exposure to, and infection, with the novel coronavirus, COVID-19 depend on the type of work being performed and exposure risk. Employers should adapt infection controls strategies based on a thorough hazard assessment, using appropriate combination of engineering and administrative controls, safe work practices, and personal protective equipment (PPE) to prevent employee exposure.

1. Develop COVID-19 Exposure Control Plan (ECP) to guide protective actions against COVID-19
2. Conduct COVID-19 training for all employees
   * Recognizing symptoms
   * Recognizing workplace risks
   * Identifying personal risks
   * Identifying and using control measures
   * Self-monitoring
   * Exposure Incidents
   * Housekeeping
   * Hygiene practices
3. Conduct Risk Assessment for COVID-19
   1. Address levels of risk associated with various job tasks
   2. Where, how, and to what sources of COVID-19 might workers be exposed to, including:
      1. General public, customers, coworkers
      2. Sick individuals or those at particularly high risk of infection
   3. Worker’s individual risk factors (e.g., older age; chronic medical conditions)
   4. Identify control measures necessary to address those risks
4. Stay aware of federal, state, local guidance and consider how to incorporate those recommendations into workplace-specific plans
5. Contingency Plans
   1. Need for social distancing - staggered work shifts, downsizing operations, delivering services remotely
   2. Conducting essential operations with a reduced workforce

**GCSAA’s COVID-19 Plan**

**Classifying Worker Exposure to COVID-19**

Worker risk of exposure to COVID-19, the virus that causes COVID-19, during an outbreak may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with COVID-19, or requirement for repeated or extended contact with person known to be, or suspected of being, infected with COVID-19.

The physical layout and dimensions of the golf course sites provide ample social distancing when the ground or golf crews are performing their job assignments. Typically, the maintenance facilities are separated from the clubhouses. Additionally, interaction between ground and golf crews golf course staff and clubhouse staff is extremely limited and usually occurs one-on-one between golf course staff and clubhouse staff.

In addition to the required posting of the OSH Act (1903.2), the Tennessee poster (1902.9) describing employees’ protections covered by the State plan, and the 2020 Families First Coronavirus Response Act (FFCRA), listed below are basic control measures that can be easily used in this type of workplace environment.

1. **Basic Infection Prevention Measures**

* Hand Washing
  + Workers, customers, worksite visitors
* Encourage respiratory etiquette – covering coughs and sneezes
* Providing tissues and trash receptacles
* Discourage workers from using others’ phones, desks, offices, work tools and equipment
* Maintain regular housekeeping practices
* Encourage employees to self-monitor for signs and symptoms
* Immediately isolate people who have signs and symptoms
* Provide face masks to limit spread of respiratory secretions for voluntary use
* Provide adequate, usable, and appropriate training, education and informational material about grounds or golf course essential job functions and worker health and safety, including proper hygiene practices and the use of any workplace controls (PPE)

**Knowing What Workplace Controls to Implement**

In all workplaces where exposure to the COVID-19 may occur, prompt identification and isolation of potentially infectious individuals is a critical first step in protecting workers, visitors, and others at the worksite.

A COVID-19 Exposure Risk Assessment using OSHA’s Occupational Risk Pyramid will be conducted to identify the level of risk for golf course employees. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with COVID-19 (COVID-19), or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with COVID-19. To help employers determine appropriate precautions, OSHA has divided job tasks into four risk exposure levels: very high, high, medium, and lower risk. Most American workers will likely fall in the lower exposure risk (caution) or medium exposure risk levels.

The Grove, 6467 Eudailey-Covington Road, College Grove, Tn 37046, managed by Joe Kennedy, Director of Agronomy, was the site of the COVID-19 Risk Assessment for the Exposure Control Plan. A private golf course, designed by Greg Norman, the course originally opened in 2012. The course consists of four Par 3's, 10 Par 4's and four Par 5's and plays to a maximum distance of 7368 yards with a course rating of 75.8 and a slope of 142 over 18 holes. Representative of other private golf courses, , it was thought the two employee groups considered in the Risk Assessment – grounds crew and golf crew – would also be representative of typical golf course employee groups and the daily job assignments that might be a COVID-19 exposure hazard.

**After a COVID-19 Risk Assessment was performed at The Grove, the risk level was determined to be Lower Risk.**

Observation was used to evaluate:

* Job tasks involving interaction with coworkers, members, and the public
* How often these interactions occurred
* How long these interactions lasted

With the data from the COVID-19 Risk Assessment, a framework called the “hierarchy of controls” was used to evaluate, select, upgrade or implement ways of controlling workplace hazards. The best way to control a hazard is to systemically remove it from the workplace. During a COVID-19 outbreak, when it may not be possible to eliminate the hazard, the most effect protection measures are: engineering controls, administrative controls, safe work practice controls, and PPE. A combination of control measures might be necessary to protect workers from exposure to COVID-19.

**Engineering Controls**

Engineering controls involve isolating employees from work-related hazards.

* Because of Lower Exposure Risk, additional Engineering controls are not recommended for the ground or golf crews
* ~~GCSAA~~ The golf course should ensure that any engineering control already used to protect crews from other job hazards continue to function as intended

**Administrative Controls**

Administrative controls require action by the worker or employer.

Examples of administrative controls for COVID-19 could include:

* Encouraging sick workers to stay home
  + Training on self-monitoring, COVID-19 symptoms
* Isolating and sending home employees who display COVID-19 symptoms
  + Guidelines on isolation/being sent home depending upon positive exposure or suspected exposures
* Minimizing contact among co-workers, vendors, and members
  + Establishing entry boundaries, equipment pick-up and return
* Minimizing contact among co-workers, vendors, and members by identifying one contact person to interact with the person and then disperse information as required
  + Equipment Manager handles all equipment exchanges on one-to-one basis
* Providing crews with up-to-date education and training on COVID-19 risk factors and protective behaviors
  + Monitor public health communications about COVID-19 recommendations
* Collaborate with workers to designate effective means of communicating important COVID-19 information

**Safe Work Practice Controls**

Safe work practice controls are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard.

Examples of safe work practices for COVID-19 could include:

* Temperature check
  + When arriving at work, crew will remain in their vehicles until signaled to come into the maintenance facility to one specific entrance for the temperature check
  + One at a time, practicing social distance, crew will step in for the temperature check
  + When OKed to move on, crew will clock in, check their assignments, gather necessary gear from lockers, and exit the maintenance facility
* Providing resources for personal hygiene
  + Tissues, no-touch trash cans, hand soap, alcohol-based hand rubs, disinfectants, disposable towels
* Requiring regular hand washing
* Maintaining 6 ft social distance in the lunch room
  + Marking the tables and benches; removing some of the tables and chairs; eating outside on picnic tables; eating in separate areas
* Maintaining 6 ft social distance when performing job tasks
* Providing hand sanitizer for crews
* Post handwashing signs in restrooms
* Regular cleaning of touch point surfaces several times during the day
* Use of gloves while driving carts
* Leave doors open as much as possible to eliminate the need for touching the doors
* Keep members informed about COVID-19 symptoms or new procedures implemented to prevent exposure
* Limit members or public’s access to specific golf courses areas

**Personal Protective Equipment (PPE)**

While engineering and administrative controls are considered more effective in minimizing exposure to COVID-19, PPE may also be needed to prevent certain exposures.

Examples of PPE could include: gloves, and face masks, in addition to the regularly required PPE’s for protection from identified golf course hazards. During an outbreak of an infectious disease, such as COVID-19, recommendations for PPEs specific to job tasks may change depending on updated risk assessments for workers and updated information of PPE effectiveness in preventing the spread of COVID-19.

All types of PPE must be:

* Selected based upon the hazard to the worker
* Consistently and properly worn when required
* Regularly inspected, maintained, and replaced as necessary
* Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, or others

NOTE: As of April 2020, the use of face masks (N95) is voluntary for employees. Should the situation change or confirmed positive cases of COVID-19 emerge, the use of masks and other face covering protective devices will be revisited and the policy revised.

**Environmental Decontamination**

When someone touches a surface or object contaminated with the virus that causes COVID-19, and then touches their own eyes, nose, or mouth, they may expose themselves to the virus.

Because the transmissibility of COVID-19 from contaminated environment surfaces and objects is not fully understood, the employer should carefully evaluate whether or not work areas occupied by people suspected to have the virus may have been contaminated and whether or not they need to be decontaminated in response.

Examples of GCSSAA’s environmental decontamination could include:

* Regular cleaning of the breakroom and bathrooms with appropriate disinfectant
* Continuous cleaning of surfaces after work activities or eating food
* Continuous cleaning of touch surfaces such as door knobs

**Refer to GCSAA’s Guidelines for Coronavirus (COVID-19) information sheet and other resources on** [*https://www.gcsaa.org/resources/covid-19-pandemic-resources*](https://www.gcsaa.org/resources/covid-19-pandemic-resources)

**Employee Training**

Employer will train all crew with reasonable anticipated occupational exposure to COVID-19 about the sources of exposure to the virus, the hazards associated with that exposure, and appropriate workplace protocols in place to prevent or reduce the likelihood of exposure. Immediate and annual training will include information about how to isolate individuals with suspected or confirmed COVID-19 or other infectious diseases, and how to report possible cases.

Workers required to use PPE must be trained according to PPE (29 CFR 1910.132), Eye and Face Protection (29 CFR 1910.133), and Hand Protection (29 CFR 1910.138).

The training will also include review of the golf course COVID-19 Exposure Control Plan.

1. **Identifying and Isolating Suspected Positive Cases**

In all workplaces where exposure to COVID-19 may occur, prompt identification and isolation of potentially infectious individuals is a critical first step in protecting workers, visitors, and others at the golf course.

Upon recognition of or suspicion of COVID-19 and/or symptoms (i.e., temperature of 100.4°, coughing, shortness of breath), employer will:

* Immediately isolate people suspected of having COVID-19
  + Move potentially infectious people to isolation rooms and close the doors
* Provide the potentially infectious person with a facemask to limit the spread of the person’s infectious respiratory secretions
* Arrange transportation home or to a medical facility
* Protect workers in close contact with the sick person by using additional control measures such as immediate hand-washing, immediately removing gloves and replacing with a fresh pair, immediately removing mask and replacing with a fresh mask, immediately maintaining the 6ft social distance, and requiring immediate self-monitoring
  + Close contact includes instances where there is direct contact with secretions while not wearing recommended PPE

NOTE: Close contact generally does not include brief interactions, such as walking past a person

1. **Identifying and Isolating Possible Exposure Cases**

Upon suspicion of possible COVID-19 exposures, employer will:

* Immediately isolate people suspected of possible COVID-19 exposure
  + Move potentially infectious people to isolation rooms and close the doors
* Provide the potentially infectious person with a facemask to limit the spread of the person’s infectious respiratory secretions
* Arrange transportation home for self-isolation based on
  + 7 days with no symptoms
  + 3 days after testing negative
* Protect workers in close contact with the sick person by using additional control measures such as immediate hand-washing, immediately removing gloves and replacing with a fresh pair, immediately removing mask and replacing with a fresh mask, immediately maintaining the 6ft social distance, and requiring immediate self-monitoring
  + Close contact includes instances where there is direct contact with secretions while not wearing recommended PPE

NOTE: Close contact generally does not include brief interactions, such as walking past a person

1. **Return to Work**

Employer will follow OSHA’s and the Center for Disease Controls guidelines for return to work following a confirmed positive COVID-19 or possible COVID-19 exposure.

1. Test-based strategy*.* Exclude from work until
   * Resolution of fever without the use of fever-reducing medications **and**
   * Improvement in respiratory symptoms (e.g., cough, shortness of breath), **and**
   * Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from at least two consecutive nasopharyngeal swab specimens collected ≥24 hours apart (total of two negative specimens)
2. Non-test-based strategy. Exclude from work until
   * At least 3 days (72 hours) have passed *since recovery* defined as resolution of fever without the use of fever-reducing medications **and** improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**,
   * At least 7 days have passed *since symptoms first appeared*
3. Suspected Exposure

* 7 days with no symptoms

1. **Following Existing OSHA Standards**

Existing OSHA standards may apply to protecting crews from exposure to and infection with COVID-19.

While there is no specific OSHA standard covering COVID-19 exposure, some OSHA requirements may apply to preventing exposure to COVID-19.

* Personal Protective Equipment (PPE) - 29 CFR 1910 Subpart I
  + Requires the use of gloves, eye and face protection and respiratory protection
  + When respirators are necessary, employers must implement a comprehensive written respiratory protection program- 29 CFR 1910.134
* General Duty Clause, Section 5(a)(1)
  + Requires employers to furnish to each worker “employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm.”
* Bloodborne Pathogens – 29 CFR 1910.1030
  + Though it applies to exposure to blood and other potentially infectious materials, the provisions of the standard offer a framework that may help control some sources of the virus, including exposure to body fluids (e.g., respiratory secretions)