

# Pandemic Infectious Disease Plan Update: Managing a New Normal?

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In March 2020, COVID-19 was declared a pandemic by the WHO and a National Emergency in the United States. Soon thereafter the U.S. saw the cancellation of large-scale events such as concerts, conventions and professional sports, the closure of schools and businesses, and the issuance of shelter-in-place orders to residents of numerous states. Businesses deemed “essential” were permitted to continue operations under new restrictions, while “non-essential”



businesses were temporarily shuttered. In May and June of 2020, as the shelter-in-place restrictions were beginning to lift and businesses were planning their reopening, Jason Lang, CIH, CSP and Frank Pagone, PhD of RHP authored ["Pandemic Infectious Disease Plan: Returning to a New Normal"](#) advocating for the development and implementation of a facility specific school/business pandemic/infectious disease response plan. Lang/Pagone highlighted the importance of an effective response plan for the continued operation of all essential businesses and for the reopening of non-essential businesses in a controlled manner. Regulatory agencies including [OSHA](#) and [CDC](#) have set out and updated their recommendations for reopening and, along with professional organizations such as the [AIHA](#), provide guidance on minimum requirements for reopening and plans ([backtoworksafely.org](#)). Some US cities and counties require a filing of plans for approval prior to reopening.

This past spring, we saw the beginning of COVID-19 related claims against employers and business owners by employees and/or employee family members. Filed claims include workplace safety and health, paid leave, WARN Act, ERISA, employee privacy, worker classification, disability accommodation, and discrimination claims. The filing of claims underscores the need for employers to have defined, clear, achievable and transparent response plans prior to or at the time of opening. Hiring credentialed and experienced safety professionals can provide business owners a reliable resources to understanding the changing regulatory landscape and guidance as well as the control measures, administrative and engineering changes and adaptations specific to a workplace or facility, and best position businesses and business owners for reopening in the safest manner possible.

For employers and business owners developing and/or updating infectious disease/ pandemic response plans, a comprehensive plan should be company, workforce and location specific, and at a minimum should include:

- Purpose of the plan and definitions
- Designated point of contact/coordinator;
- Definition/ determination of essential personnel

- Remote work policies
- Training requirements
- Infection control measures including health certification, engineering and administrative controls, personal protective equipment (PPE), physical distancing and personal hygiene
- Requirements for onsite customer or vendor and interactions
- Examples of guidelines to be posted throughout the facility
- Procedures for addressing a confirmed infection
- Procedures on employee and family medical leave and pay and emergency contact information
- Company specific travel guidance
- Special needs, accommodations and assistance programs
- Business continuity
- Processes for reporting unsafe conditions

If applicable for your workplace, company specific materials and plans should be available in multiple languages to be shared with employees.

As with all safety and health programs, recordkeeping is an important aspect both in understanding employee awareness and training and providing protection for businesses from future claims. Posted materials such as checklists or graphics can serve as reminders to employees and management of the importance of the training and procedures set out to protect all. Diligence in implementing best practices, including recordkeeping, protects a trained workforce, brand reputation, and prevents headaches for management.

Remember, in addition to an infectious disease plan, businesses that have been closed or where building/facility use has been lessened, management and building/facility services should check and flush hot and cold water systems (while avoiding any splashing and aerosolization) for any bacteria (legionella) and/or metal (lead, copper) buildup resulting from non-use. RHP Risk Management's experienced, credentialed and trained public health and scientific professionals continue to monitor, assemble, audit, and assess the evolving information on the current pandemic (SARS-CoV-2) and are developing programs, systems, and plans to help our clients be healthy and safe workplaces and facilities.

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*For more resources concerning COVID-19, visit [www.rhprisk.com/coronavirus](http://www.rhprisk.com/coronavirus)*

