

EHS NOW

An Online Educational Experience
EHS Daily Advisor



EHS NOW SPECIAL REPORT

Applying the Hierarchy of Controls
to Your Safety Plans, Policies, and
Procedures for COVID-19 and Beyond

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INTRODUCTION

Emergency preparedness and response is an important aspect of the environment, health, and safety (EHS) function, and never has it felt more pressing than during the COVID-19 pandemic. Occupational health and safety are currently top of mind for businesses, perhaps more than ever before in our careers, and now is the time to ensure that our safety management plans, policies, and procedures are attuned to the hazards our workforces face every day at our organizations. This state of readiness does not apply solely to COVID-19 but must also be geared toward all of the other potential EHS hazards, incidents, emergencies, and disruptions to come.

At the *EHS Daily Advisor's* EHS Now Virtual Event on June 17, 2020, these issues were addressed in an educational session titled "*Workplace Plans, Policies, Documentation, and Data Collection During a Pandemic*," sponsored by Skillsoft. Over the course of the presentation, Norman Ford, VP of Compliance Products for Skillsoft, and Donna McEntee, Skillsoft's Workplace Safety and Health Solution Director, led an in-depth discussion regarding the complexities of managing safety through this difficult public health crisis and beyond.

In this Special Report, we will share key takeaways from Ford and McEntee's session, including:

1. How this world of change highlights the importance of reexamining your existing safety and preparedness programs;
2. How to create new policies, standards, and controls (or improve your existing procedures) by applying the Hierarchy of Controls; *and*
3. Strategies for overcoming the challenges of implementing change within safety management so you can empower employees to participate in safety and better ensure business continuity.



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A WORLD OF CHANGE

In December 2019, the SARS-CoV-2 novel coronavirus, the virus that causes the respiratory illness COVID-19, first appeared in Wuhan, China. The World Health Organization reported on January 13th a case in Thailand, the first outside of China, in a woman who had arrived from Wuhan. On January 17th, a second death was reported in Wuhan. Authorities in the US, Nepal, France, Australia, Malaysia, Singapore, South Korea, Vietnam and Taiwan confirmed cases over the following days.

In the same month, health leaders confirmed human-to-human transmission of COVID-19, and initial cases, all with a connection to Wuhan, were diagnosed in the United States. This discovery was followed with the declaration of a public health emergency, and, silently but rapidly, transmission of the virus continued throughout the month of February as the first deaths occurred. A critical personal protective equipment (PPE) shortage developed as public concern grew over the spread of COVID-19, and people responded by clearing the shelves of items such as surgical masks, gloves, and isopropyl alcohol.

As the scope of the crisis became clearer in March, state governors across the country began issuing orders requiring nonessential workers to stay at home and, if possible, for nonessential businesses to temporarily shut down. Essential businesses were forced to quickly adapt to new guidelines and implement measures to protect the health and safety of both workers and customers.

One thing is abundantly clear: The way we do business has likely changed for the long term in the wake of rapid organizational adaptation to a host of new guidance, recommendations, and requirements issued by federal and state governments, the *Centers for Disease Control and Prevention (CDC)*, the *Occupational Safety and Health Administration (OSHA)*, and the *National Safety Council (NSC)*, among others. Stay-at-home and safer-at-home orders helped flatten the curve in some areas and pave the way for the phased re-openings we're seeing across the country, but the fact remains that these changes will have a lasting impact.

It's also important to remember that the response to COVID-19 has been a global effort. Guidance and resources from the *World Health Organization (WHO)*, *International Labor Organization (ILO)*, and the *European Union (EU)* add valuable information for multinational organizations looking to keep their worldwide workforces health, safe, and productive. National directives and information from the *United Kingdom*, *Australia*, and *India* have guided their country's responses to the coronavirus, and the *Canadian Centre for Occupational Health*



and Safety (CCOHS) has provided its populace with an *overview of the hierarchy of controls* that provides important considerations for addressing the COVID-19 threat.

The real question is, now that we're starting to come out of an extended period of lockdown and seeing another spike in cases, what changes will your organization need to make to its business continuity plan and safety management systems in order to weather the remainder of this pandemic? Better yet, what steps will you put in place now to prepare for another disruptive event in the future?

WHAT'S YOUR LEVEL OF PREPAREDNESS?

To gauge the level of preparedness to meet current challenges surrounding the pandemic, Ford and McEntee asked their EHS Now audience if their organization had a policy in place to guide how employees should report that they have COVID-19-related symptoms while at work or at home. An overwhelming majority (**92%**) said yes, they do have such a policy in place, which is a testament to the vigilance and readiness of the EHS community.

While no organization is completely safe from the devastating effects of a pandemic event, there are plenty of steps you can take now to prepare your business in the event of a future emergency, whether it be another pandemic, a natural disaster, or an act of workplace violence.

At a high level, employers must establish a preparedness and response plan that considers guidance from federal, state, local, tribal, and/or territorial health agencies. To establish this plan, employers will want to evaluate the what, where, and how of the hazards to which workers might be vulnerable and then determine the controls they can put in place to mitigate risk.

Every employer should:

- Conduct hazard vulnerability assessments of all buildings on its site and strengthen hazardous structures where necessary.
- Eliminate nonstructural hazards that could exacerbate a disaster, such as ensuring containers carrying hazardous substances are properly secured.
- Conduct emergency drills, and train employees in preparedness and response.
- Identify vital business records, and protect computer data and equipment, including any cloud-based or other off-site backup system that maintains essential records.



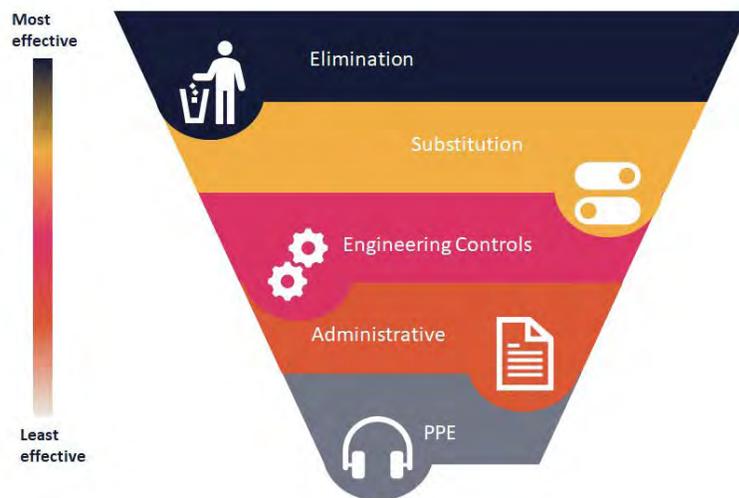
Remember, a thorough risk assessment not only identifies hazards and threats but also affords you the opportunity to prevent hazards and mitigate risks. [Ready.gov](https://www.ready.gov), operated by the Federal Emergency Management Agency (FEMA), has a variety of resources to help you get thinking about how you can develop preparedness and response plans, including for directly addressing pandemics.

No one organization's needs are exactly the same as another's, however, and EHS managers and professionals must take a customized approach to ensure their businesses are prepared. While the individual plans may be unique, policies and preparations can be guided by a proven and easily accessible framework: The Hierarchy of Controls.

APPLYING THE HIERARCHY OF CONTROLS

The Hierarchy of Controls was created by the National Institute for Occupational Safety and Health (NIOSH) as part of its Prevention Through Design initiative. While it was developed to help EHS professionals identify and mitigate the day-to-day hazards across a wide range of industries, Ford and McEntee assert that we can harness the strategy to help businesses navigate infectious disease outbreaks.

Hierarchy of Controls



According to the Hierarchy of Controls, there are five categories of controls safety professionals can implement to address hazards and risks (including disease) in the workplace. The first, and most effective, calls for the **elimination** of the hazard. Next, if the hazard cannot be eliminated, provide an appropriate **substitute** to address the hazard. Then, if a hazard cannot be eliminated or substituted, implementing



engineering controls will mitigate exposure by physically separating workers from the hazard. Use **administrative controls** to provide guidance to employees so they can change the way they work, thereby helping to minimize risk. Lastly, **PPE** serves as a last line of defense to protect workers from the hazard; however, this final layer is considered the least effective when compared with higher-level controls.

Relying on a well-tested method such as the Hierarchy of Controls makes sense—but to address the serious health and safety concerns a pandemic or an infectious disease outbreak presents, we need to get a clearer picture of what the control categories would look like in practice. Ford and McEntee provided the following insights to the EHS Now virtual attendees.

▶ **Elimination and Substitution**

While you cannot completely **eliminate** a virus's ability to spread through your organization or perform **substitutions** to replace a virus with a nonhazardous substance, you can take steps such as implementing stay-at-home policies for nonessential workers. Additionally, you can provide flexible leave policies for employees who become ill or have a family member who becomes ill. These types of policies will help protect the essential workers at your organization by minimizing the number of people with whom they come into contact on a daily basis.

▶ **Engineering Controls**

There are a number of **engineering controls** you can put in place at your facilities to put some physical distance between employees, helping minimize risk. These include updating disinfecting policies and procedures; utilizing rope and stanchion systems to help control movement; implementing barriers like partitions (plexiglass or otherwise) between workstations; installing sneeze guards; and/or providing hands-free trash bins, soap dispensers, and disposable towel dispensers.

▶ **Administrative Controls**

There are also a wide range of **administrative controls** your organization can develop and deploy to change how employees interact. Implementing changes to remote work and travel policies empowers workers to utilize technology as both a tool and a barrier, allowing them to productively complete work while minimizing potential exposure to the hazard. Develop policies for workers who must come into your facilities that tap into the guidance provided by state governments and federal agencies. These would include social distancing and face coverage guidelines, along with setting hygiene standards such as a cough and sneeze etiquette policy. For any customer-facing employees, set policies that modify such interactions in accordance with expert guidelines. Reinforce all of these policies with signage placed throughout the facility.



Another administrative step you can take is reinforcing health monitoring and possibly even providing health screening for workers coming into your facility. Develop a policy that provides a clear path for returning to work for any employees who have recovered from an infection, and ensure these employees are trained on any new or updated policies before they return to their position following an illness.

▶ PPE

Lastly, ensure workers have access to and are trained in using **PPE** as a last line of defense. Help them understand the differences between respirators, masks, and face coverings—OSHA has *recently provided guidance* on these differentiations. Implement training to teach workers how to apply and remove their PPE. For those required to use a respirator, remind them of your organization’s cleaning and storage policies. Update and communicate changes to these policies as needed.

Ford and McEntee’s presentation demonstrated the Hierarchy of Control’s effectiveness in approaching a pandemic situation, but as you read these insights, it becomes apparent that it can be a useful tool for informing nearly all areas of concern within your safety program.

OVERCOMING IMPLEMENTATION CHALLENGES

In today’s working world, policy implementation is a challenge even without the added obstacle of a worldwide pandemic. The added complexities of COVID-19 were reflected in a poll of attendees in Ford and McEntee’s educational session—59% of the EHS Now audience works at an organization with employees located in different cities where return-to-work requirements differ from location to location. Gaining buy-in across the organization, providing easily accessible training, and clear communication are all necessary steps.

Here are some considerations to keep in mind when addressing any challenges you may experience during policy implementations:

- Provide each team member with role-appropriate training, education, and informational material about changes to job functions, worker health and safety, workplace controls (including PPE), and medical care in the event of an outbreak.
- Address dispersed and possibly inconsistent or incongruous procedures and policies across your facilities and employee population that may include differences related to geography, job function, and even language. Fifty-six percent of the EHS Now audience did not provide training, policies, and communications in multiple languages—it is important to ensure you are communicating to all employees using a language they understand.



- Use flexible tools such as online training, checklists, and communication to drive adoption and reinforcement of safety policy in the workplace. Software solutions, such as *Skillsoft Certitude*, can be invaluable to simplifying and streamlining all of the processes necessary to put these tools to good use.

Frequent, transparent, and effective communication with both your customers and your workforce remains the cornerstone of EHS success; this principle is even more crucial when facing changes as drastic as those faced by businesses today.

LOOKING TO THE FUTURE OF SAFETY MANAGEMENT

What new policies, standards, and controls may be formed in the wake of the COVID-19 crisis? While we won't know the full scope of the pandemic's impact for months or even years, it has clearly led to a shift in the way organizations and even society as a whole view workplace safety. Rather than PPE, many have come to view preventive measures as CPE—*community* protective equipment.

With a renewed focus on the safety of our work and home communities, safety management will likely evolve to include remote work policies, health and wellness programs, considerations for employee mental health, and shifts in how OSHA recordable cases are treated during a pandemic. Contact tracing programs are among the various controls to stem the hazards posed by COVID-19 organizations are considering—but these must be done in a way that ensures employee privacy, as they will certainly involve personal questions and resulting private data. When teamed with the proper communication strategies and reinforced by the support of upper management and supervisors, these policies and procedures can build the confidence of employees and employers alike, even in a constant atmosphere of uncertainty.

Underlying all of this, EHS professionals must be open to new ways of working together and with employees—and must especially be ready to implement policies and train accordingly.