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- Aaron advises employers through inspections and enforcement actions involving fed. OSHA and state OSH programs, while managing the full range of litigation against OSHA.
- Based in Chicago, Aaron lead's Conn Maciel Carey's Midwest OSHA practice and is Co-Chair of the firm's COVID-19 Task Force.
- University of Chicago, BA (1992); University of Texas School of Law, JD (1995).

VIRTUAL



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# COVID-19 Exposure Control Plans

The Key to OSHA Compliance During the Pandemic

# What is an ECP?

- Written safety plan outlining how you will prevent the spread of COVID-19 in your workplace
- A single document or a binder
- Big picture distilled down to key elements
- How you address a significant hazard (think LOTO)
- One size does not fit all—ECP should be tailored to your specific site

# Why do we need an ECP?

- OSHA & the CDC recommend them (3/9/20)
- Various jurisdictions require them
- Likely mandated as part of an ETS
- Helps ensure nothing is overlooked
- Effective communication tool
- Improve morale and engagement
- No better document to produce in response to complaint or during inspection

# What should be included in an ECP?

- Hazard elimination measures (work from home)
- Screening measures/keeping sick individuals out
- Social Distancing
- Engineering controls
- Cleaning and sanitizing
- Responding to confirmed cases protocol
- Face coverings & PPE
- Training/communication plan

# How do we prepare an ECP?

- Perform a detailed risk assessment of every aspect of your operation
- Consider levels of risk of various jobs/tasks
- Create cross-functional team of managers and supervisors from various departments
- Solicit input from employees and include unions, if possible
- Consider retaining expert or utilize association resources
- Document decisions, particularly any key CDC/OSHA recommendations or measures that you decide not to adopt