

**[INSERT COMPANY NAME]**

# Virginia OSHA COVID-19 Infectious Disease Preparedness and Response Plan for Medium and Lower Exposure Workplaces

Developed by:



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## **Policy Statement**

[Insert Company Name] (“[Company Name]”) is committed to ensuring that our worksites, associates, subcontractors, and vendors are prepared for and in compliance with the Virginia Occupational Safety and Health Program (VOSH), the Centers for Disease Control and Prevention (CDC), and local, state, and federal guidance regarding COVID-19. Our leadership team fully supports this global effort. The health and safety of our employees is the paramount concern for our Company.

This plan is developed in accordance with the guidelines outlined by the CDC and VOSH, as well as the [Company Name] Safety Manual, in addition to state and local guidelines and best practices.

The Company will ensure compliance with all requirements of the Virginia OSHA [Emergency Temporary Standard](#) on COVID-19 or any Virginia executive order or order of public health emergency related to the novel coronavirus or COVID-19.

## Classifying Worker Exposure

[Company Name]'s business operations fall under ["lower" or "medium"] exposure categories based on VOSH guidelines. We recognize that VOSH and CDC guidelines may differ in defining exposures to workers on the job. It is [Company Name]'s intent to reference both governing agencies and defer to whichever requirement is more stringent.

VOSH defines **Medium Exposure Risk** as jobs that require frequent and/or close contact with (i.e. within six feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients. In areas where there is ongoing community transmission, workers in this category may have contact with the general public. VOSH identifies poultry and meat processing, retail stores, and manufacturing settings as likely medium exposure jobs.

VOSH defines **Lower Exposure Risk** as jobs that are not otherwise classified in a higher designation that do not require contact inside six feet with persons known to be, or suspected of being, or who may be infected with SARS-CoV-2. Employees in this category have minimal occupational contact with other employees, other persons, or the general public, such as in an office building setting; or are able to achieve minimal occupational contact through the implementation of engineering, administrative, and work practice controls, such as physical barriers, telecommuting, staggered work shifts, remote service delivery, physical distancing, and use of face coverings.

Concerning the selection of a risk category, the Company will review all activities to ensure that the appropriate category and corresponding protection for workers are provided, including a review of employees' interaction with the public and customers, those who may be at higher risk of COVID-19 infection, individuals' risk factors, and engineering, administrative, work practice, and personal protective controls.

[Company Name]'s management has addressed potential hazards with the following controls when developing the Job Hazard Analysis:

1. Engineering Controls
2. Administrative Controls
3. Personal Protective Equipment (PPE)

**If the proper controls cannot be safely implemented, work shall not proceed. A Job Hazard Analysis will be documented for each task at the facility, signed and dated by the manager conducting the analysis.**

## **VOSH and CDC Preventative Guidance**

VOSH and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Wear cloth face coverings at all times unless instructed not to do so.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.
- Always wash your hands:
  - after coughing or sneezing;
  - after toilet use;
  - when hands are dirty;
  - after handling animals or animal waste; and
  - before, during and after you prepare food and before and after eating.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

- Tiredness;
- Coughing;
- Fever;
- Sore Muscles;
- New Loss of Smell or Taste;
- Aches and Pains;
- Nasal Congestion;
- Runny Nose;

- Sore Throat;
- Nausea or vomiting;
- Diarrhea; and
- Shortness of breath or difficulty breathing.

Anyone who has or has had these symptoms and were not medically confirmed or tested for COVID-19 must inform their supervisor and stay out of the workplace until all three of the following conditions are met:

- No fever for 72 hours without the use of fever reducing medications;
- Other symptoms have improved; AND
- At least 10 days have passed since symptoms first appeared.

Alternatively, individuals may come into the workplace if they:

- Have received two negative COVID-19 tests at least 24 hours apart;
- Have no fever without the use of fever reducing medications; AND
- Have improvement in any respiratory issues (e.g., cough and shortness of breath).

Anyone who has had known [direct exposure](#) to a confirmed or suspected case of COVID-19, which mean contact with (within six feet for 15 minutes or more during the time period of 48 hours before the infected person exhibits symptoms until they released from [self-isolation](#)), living with, an intimate partner with, or who is caring for a person who is medically confirmed or tested for COVID-19 may not enter the workplace until the end of the 14-day self-quarantine period from the last date of exposure. During the 14-day period, these individuals should self-monitor for symptoms, avoid contact with high risk individuals, and follow CDC guidelines if symptoms develop.

**[NOTE TO EMPLOYERS: If you qualify as a [critical infrastructure employer](#), those employees who have direct exposure to COVID-19 may continue to work as long as they are asymptomatic and you follow the [CDC's guidance for critical infrastructure employees for the 14 days following their exposure](#)].**

## **Roles & Responsibilities**

[Company Name]'s team members all share unique roles and responsibilities within our company, many of these responsibilities are outlined in [Company Name]'s Safety Manual. COVID-19 presents a need for these roles and responsibilities to grow to enact both our safety protocols and our business continuity response plan.

Below is a general guideline of Roles and Responsibilities. The COVID-19 Safety Monitor will train all associates on their roles and responsibility with regards to this plan. Managers and supervisors are familiar with this plan and are prepared to answer any questions.

**Stop work authority** – All [Company Name] team members have the authority and responsibility to stop work if they feel there is an unsafe condition or if the activity is not in alignment with this program.

**COVID-19 Safety Monitor** – [Company Name] has designated at least one person per work shift as the COVID-19 Site Safety Monitor.

COVID-19 Site Safety Monitors, including [Names of Site Safety Monitors], will work directly with [Company Name]'s leadership to execute the [Company Name] COVID-19 safety plan and monitor compliance. The Safety Monitors will duly report to the [Company Name]'s manager. The Site Safety Monitors will also ensure compliance with all requirements of the VOSH Emergency Temporary Standard on COVID-19 or any Virginia executive order or order of public health emergency related to the novel coronavirus or COVID-19.

The following items outline the expectation and responsibility of the COVID-19 Site Safety Monitor(s). **The Site Safety Monitors ARE NOT the sole associates responsible for COVID-19 Safety. All associates all have roles and responsibilities defined as part of this program.**

The COVID-19 Site Monitor Duties include:

- Monitoring compliance with the six-foot social distancing protocols.
- Ensuring workers that must work within six feet of each other are properly protected.
- Enforcing the 100% cloth face covering requirement when appropriate.
- Resource to monitor and answer questions from field associates on safe work practices and communicate to leadership in a timely manner.

### **Managers**

- Responsible for overall implementation and enforcement of this plan.
- Responsible for job site compliance and work health and safety.
- Ensuring proper required signage is current and properly posted.

- Coordinating among the [Company Name] team, subcontractors, customers, etc. with regards to facility operations and COVID-19 response.
- Responsible for ensuring proper training of [Company Name]'s employees.
- Enforcing rules including re-training and potential discipline for safety policy violations.
- Ensuring tenants and subcontractors incorporate COVID-19 safety protocols.
- Ensuring daily changes are communicated to the team and trade partners.

### **Supervisors**

- Assist with implementation of this program.
- Identify and communicate any worker training needs.
- Lead social distancing efforts by ensuring contractors, vendors, and third-parties have implemented their site-specific plan.
- Participate in a daily check-in with leadership to understand changes in local ordinances.

### **Team Members (associates)**

- Help minimize the spread of COVID-19.
- Participate in and understand Response Plan.
- Practice good hygiene.
- Immediately report sickness or potential sickness to supervision.
- Support and emphasize social distancing practices.

### **Engineering Controls**

Engineering controls help reduce exposure to hazards by isolating employees from the hazards. The Company has implemented the following engineering controls to increase employee safety:

- Increased ventilation in the work environment.
- Installing plastic barriers between employees when performing temperature taking.
- Limiting interactions between employees and customers.



## **Administrative Controls**

Administrative controls require action by both the employee and the Company. These are changes in work policies and procedures to reduce or minimize exposure to COVID-19 in the workplace. These changes include:

- Requiring sick employees to stay at home.
- Minimizing contact between employees through social distancing.
- Providing employees with up-to-date education and training on COVID-19 and protective behaviors (e.g., proper hygiene, PPE, and cough etiquette).
- Providing employees with and training employees on proper use of personal protective equipment.
- Requiring regular hand washing and use of hand sanitizer.
- Staggering work schedules.
- Implementing alternative travel arrangements in lieu of car-pooling.
- Changes in schedules in the case of increase absenteeism.
- Changes in practices due to delays in supply chain deliveries.

## **Personal Protective Equipment**

Teams have reviewed required and necessary PPE for each task and will ensure that workers are properly trained to utilize PPE. VOSH's standard on PPE shall be followed in addition to the respiratory protection program.

Cloth face coverings may be required at all times and are not a substitute for social distancing. The cloth face coverings recommended are not surgical masks or N-95 respirators. Those are critical supplies that must continue to be reserved for healthcare workers and other medical first responders.

Masks may be removed: to eat or drink, provided social distancing is maintained; when in an office alone with the door closed, provided that a mask is put on when the employee

leaves their office or when someone comes in to the office, or as otherwise may be authorized by management for safety reasons.

Due to the current shortage of N95 respirators/masks, the following Work Practice Controls should be followed:

- Reduce dust by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
- Limit exposure time to the extent practicable.
- Isolate workers in dusty operations by using a containment structure or distance to limit dust exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.
- Housekeeping efforts to reduce dust levels on the project site.

### **Eye Protection:**

Employees must use appropriate eye or face protection when exposed to eye or face hazards from airborne COVID-19 particles, liquid chemicals, acids, or caustic liquids or chemical gases or vapours.

### **Hand Protection:**

- Gloves are required to be worn when performing work which may potentially expose the hands' surfaces to chemicals.
- Chemical Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify that PPE gloves should be used.

The Company will issue those associates working with chemicals their own individual gloves for hygiene purposes, or associates should use a new pair of disposable gloves with each job task.

## **Training Requirements**

[Company Name] will train associates on the potential hazards of COVID-19 and will utilize CDC guidelines as a baseline for meeting this training requirement. This training will include the characteristics and methods of transmission of COVID-19; the symptoms

of COVID-19; and the ability of pre-symptomatic and asymptomatic COVID-19 persons to transmit COVID-19.

All training shall be performed by a competent person and documented.

[Company Name]'s associates and those working on [Company Name]'s property must be properly trained in the following categories by the COVID-19 monitor when required based on exposure assessment, VOSH regulation, and/or CDC guidelines:

- This Policy
  - VOSH's emergency temporary standard on COVID-19
  - Respiratory protection
  - Bloodborne Pathogens
  - Hygiene (i.e. proper handwashing)
  - Sanitation
  - SDS sheets and product data
  - Emergency procedures
  - PPE
  - Cough and sneeze etiquette
  - Hand hygiene
  - Avoiding close contact with sick persons
  - Avoiding touching eyes, nose and mouth with unwashed hands
  - Avoiding sharing personal items with coworkers
  - Safe use of cleaners and disinfectants by following label directions and wearing proper personal protective equipment
- Advising employees to check CDC Health Travel Notice before traveling

## **Facility Access**

Employees, visitors, contractors, and customers will be orientated on facility procedures to ensure program compliance.

### **Orientation will include at a minimum:**

1. [Company Name]'s Safety Orientation Content (reference [Company Name]'s Safety Manual).
2. Applicable Site Access Protocols (i.e. temperature screening, attestation form, exit/ re-entry requirements, etc.).
3. PPE Requirements – Cloth Face Covering Requirement, etc.

4. Site Sanitation Program.
  - a. Hygiene requirements (Personal, PPE, Tools, etc.)
  - b. Toilet locations
  - c. Hand wash locations and Handwashing protocols
  - d. Waste removal
  - e. Break/meal protocols
  - f. Shared access/equipment use
5. Social distancing requirements.
6. Safety hazard notification system (emergency contacts, etc.).
7. CDC guidelines for reporting illness.

## **Operation Best Practices**

1. Facility access will be limited to employees, customers, and the customer's immediate family. No guests are permitted in the Company's facility.
2. Employees or guest should wash hands or use hand sanitizer upon arrival at facility.
3. Gates or doors that requires PIN code or card reader should remain open during normal business hours.
4. Social distancing in areas when crowds normally gather is required (restroom, break room, etc.).
5. Avoid shared use of phones, desks, radios, tools, etc.
6. Leave windows, where safe and secure to do so, open to increase ventilation.
7. Encourage payment via credit/debit card.
8. Common areas will be sanitized daily (restrooms, etc.).
9. Employees will be provided disinfectant or sanitizing wipes to clean their workspace, equipment, and tools daily.

## **Cleaning Procedures**

[Company Name] will implement increased cleaning and sanitation efforts on all project sites. In the event employees are performing cleaning methods, proper training and protective equipment will be available and must be utilized. Supervisors will review product safety data sheets (SDS sheets) and train all workers on the product that is being utilized. SDS sheets must always be made available to workers.

It is [Company Name]'s expectation that job sites are cleaned on a frequent and consistent basis in a manner appropriate with its exposure. Bathrooms, doors, high use areas, etc. shall be cleaned daily. Workstations shall be cleaned daily or as needed.

High use or communal areas shall be given special attention and identified in site-specific programs. Logs shall be kept ensuring the program is being executed, these logs shall be reviewed as part of the job site inspection process on a regular basis. If cleaning procedures or practices are found to be inadequate, site supervision shall make immediate adjustments to meet CDC guidelines and/or close the area to workers until it can be properly cleaned.

- Restrooms and break/lunchrooms must be cleaned at least once per day
- Trash cans and debris bins shall be cleaned, sanitized, and emptied as needed but at least daily
- Company vehicles, tools, and equipment shall be cleaned at least daily and before any new user.

Teams shall take steps to obtain emergency cleaning services and/or obtain emergency cleaning products in adequate supply to perform site cleaning if a positive COVID-19 case is confirmed at a project site. Extreme care shall be taken to ensure that the products being utilized to disinfect and sanitize an area are designed for COVID-19 and that workers performing the cleaning are adequately protected.

When selecting cleaning products, teams shall reference the approved EPA/CDC list of products prior to utilizing, ensuring that the product is appropriate for the intended surface.

## **Site Sanitation**

[Company Name] has implemented a site sanitation program consistent with VOSH and CDC requirements, with an increased focus on worker hygiene and sanitation. Teams shall consider the availability of equipment and cleaning products such as hand sanitizer and soap that is essential to workers maintaining proper hygiene.

If proper sanitation cannot be maintained or if essential products are not available, [Company Name]'s supervision may reduce, limit, or stagger work activities to ensure sanitation can be obtained.

Workers are encouraged to continuously wash their hands to prevent the potential spread of COVID-19. Hand washing stations, and hand sanitizer, will be made available to employees.

Employees are required to clean and sanitize their work area prior to leaving at the end of the work day.

## **Social Distancing**

Social distancing shall be practiced in accordance with [Company Name]'s CDC, and VOSH guidelines. Below is a summary of guidelines:

- Meetings, toolbox talks, and gatherings are restricted to no more than 10 people or latest guidelines while keeping six feet apart.
- Social distancing protocols require that workers maintain six feet personal separation from others while working including conducting work tasks, meetings, discussions, gatherings, etc. as much as possible, with the only exceptions being the safe performance of the task if social distancing cannot be maintained without threatening the safety of the workers or others. Alternative means of performing the task will be prioritized over working at less than six feet of distance or more from others, if feasible.
- In the event a work task absolutely requires working within six feet of other workers, the number of workers must be limited to small groups, properly trained including pre-task analysis, and shall observe and utilize proper PPE requirements.
- Verbal announcements, signage, or visual cues will be used to promote social distancing.
- Access to common areas, breakrooms, and lunchrooms will be controlled. All gathering areas will have posted the maximum safe capacity/occupancy limit, requirements for hand washing/sanitizing, physical distancing, and cleaning and disinfecting shared surfaces.
- Start times will be staggered as necessary.

- Interactions amongst customer and employees will be limited.
- All workers will have access to clean, potable water throughout their work shift.
- Workers will be provided short breaks at least once per four hours worked to allow proper hygiene.
- Workers must limit or eliminate the sharing of tools and equipment. If sharing is not avoidable, use sanitation supplies to properly clean that equipment and tools.
- Employees are encouraged to minimize ride sharing or carpooling during this time.
- Employees are encouraged to drive/operate the same piece of equipment throughout the work shift to minimize cross contamination and need for sanitation.
- Implementing employee temperature checks is not in lieu of social distancing. Temperature checks should not give a false sense of security on social distancing. It is possible for a person to have COVID-19 and be asymptomatic or not presenting any obvious symptoms.

## **Enforcement and Reinforcement**

All workers are responsible for enforcing social distancing. [Company Name]'s shall monitor for compliance.

## **Temperature Screening & Attestation**

When required, [Company Name] will utilize worksite entry temperature screening guidelines in accordance to any and all applicable local, state, or federally mandated procedures. Extreme care will be taken to keep workers personal information private and to avoid evaluation/classification of illness by those who are not qualified.

Prior to each work shift, employees will be prescreened to verify each employee is not COVID-19 symptomatic. If an employee becomes infected with COVID-19 when not at work, they shall notify their manager immediately.

[Company Name] has implemented a program that allows for and encourages proper social distancing, and protection of those performing the scanning. Any individual tasked with performing scanning operations will be properly trained.

The Company will ensure that the facility's HVAC is properly working and maintained in accordance with the manufacturer's instructions, and complies with the American National

Standards Institute/American Society of Heating, Refrigerating and Air-Conditioning (ASHRAE) Standards.

The **Company** will implement staggered work shifts and breaks to the extent possible.

The **Company** will conduct a worksite assessment to determine what personal protective equipment is required for each job task.

## **Employee Protections**

### **Confirmed or Probable Case of COVID-19**

[**Company Name**] will follow this four-step plan when addressing a confirmed COVID-19 case in the workplace:

#### **1. Isolate/Quarantine Confirmed Employees**

The infected employee should remain at home until released by a physician or public health official. If a medical note releasing the employee is unavailable, the employee shall contact management to discuss guidelines on when an employee may discontinue self-isolation.

#### **2. Address And Isolate Employees Working Near An Infected Co-Worker\**

When engaging in contact tracing, the infected employee will be asked to identify all individuals who have had [direct exposure](#) (within **six** feet) for a prolonged period of time (more than **15** minutes of close exposure) with them from the **48**-hour period before the onset of symptoms until the infected employee is cleared to discontinue self-isolation.

All employees who had [direct exposure](#) closely with the infected employee will be sent home for 14 days after last exposure to ensure the infection does not spread. While quarantined, those employees should self-monitor for symptoms (check temperature twice a day, watch for fever, cough, or shortness of breath), avoid contact with high-risk individuals, and follow CDC guidance if symptoms develop.

**[NOTE TO EMPLOYERS: If you qualify as a [critical infrastructure employer](#), those employees who have direct exposure to COVID-19 may continue to work as long as they are asymptomatic and you follow the [CDC's guidance for critical infrastructure employees](#) for the 14 days following their exposure]**

#### **3. Clean and Disinfect the Workplace**



After a confirmed COVID-19 case, [Company Name] will follow the CDC and Virginia guidelines for cleaning and disinfecting the workplace. These guidelines include:

- Follow all directions regarding the use of personal protective equipment and other instructions on the chemicals' safety data sheets.
- Closing off areas where the person who is a probable or confirmed case of COVID-19 worked, and if possible, opening outside doors and windows and using ventilation fans to increase air circulation in the area.
- Waiting as long as practical before beginning cleaning and disinfection.
- Cleaning staff shall clean and disinfect all areas such as offices, bathrooms, and common areas used by the ill employee.
- Have our landlord/facility owner clean common areas.

#### **4. Notify Employees and Others**

Within 24 hours of learning of a confirmed COVID-19 case occurring within the last 14 days, and as recommended by the CDC, [Company Name] will notify all employees who have worked at the location where the infected employee works within the last 14 days of the infection, other employers working at the site during the last 14 days, any building owner or landlord, and the Virginia Department of Health. The Virginia Department of Labor and Industry will also be notified within 24 hours of 3 confirmed cases within 14 days of each other. [Company Name] will do so without revealing any confidential medical information such as the name of the infected employee, unless the employee has signed an authorization to disclose their diagnosis. [Company Name] will inform employees of the actions it has taken, including requiring employees who worked closely to the infected worker to go home. [Company Name] will let employees know about its sanitizing and cleaning efforts and remind employees to seek medical attention if they exhibit symptoms.

## **Confidentiality/Privacy**

Except for circumstances in which [Company Name] is legally required to report workplace occurrences of communicable disease, and/or the individual provides a written authorization to disclose their diagnosis to coworkers, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed

that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. [Company Name] reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. [Company Name] also reserves the right to inform subcontractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

## **No Retaliation**

The Company will not terminate or retaliate in any way against an employee for exercising any rights they have under any Virginia OSHA regulation, statute, or order.

## **EMPLOYEE ACKNOWLEDGMENT OF COVID-19 SAFETY AND HEALTH PROCEDURES**

In 2020, the novel coronavirus/COVID-19 swept the country, requiring an urgent and extensive public health response, including sometimes lengthy stay-at-home orders imposed by state and local governments. There still is no vaccine for the virus, and treatments are still being investigated. [Company Name] is committed to the health and safety of all employees. Therefore, as the stay-at-home orders are relaxed and we return to the workplace, safely working will require a commitment by everyone to new procedures and measures to protect employee health. These measures include referenced in this Program and also include:

1. If an employee tests positive for COVID-19, they will not be permitted to enter the workplace and must seek immediate medical attention. An employee testing positive must stay away from the workplace and self-quarantine for the appropriate period required by public health officials. The results of the test will be kept confidential to the greatest degree possible, except that the results will be provided to appropriate officials or managers of the Company who have a need to know this information and, if legally required, to appropriate public health officials.

2. Coronavirus is spread through close contact. Even as stay-at-home orders are eased, government officials still require social distancing. Employees should maintain a safe distance of at least six feet from one another at all times.

3. Employees are required to wear a cloth face mask at all times unless a specific exception applies, as contained in this Plan, or may wear masks of their own, provided they fully cover the mouth and nose.

4. Employees may not congregate in any area. Social distance must be maintained during meetings. If a meeting requires more than two attendees, additional participants should be allowed to participate by telephone or video.

5. Employees should frequently wash their hands throughout the day, at least every hour.

6. The Company will provide hand sanitizer throughout the building. Employees should use hand sanitizer after touching surfaces that may have been touched by others, such as doorknobs, handles and countertops.

7. Employees should report to management if they have had direct exposure to someone who has been diagnosed with COVID-19 or who is exhibiting symptoms consistent with the virus.

8. Employees should avoid using bathrooms when they are already in use.

9. Employees should frequently clean and sanitize the workplace. Disinfectants and cleaning supplies will be available. Desks, computers, phones, pens and other office equipment must not be shared.

10. For the protection of all employees, employees are not permitted to have family members or other visitors in the workplace. Employees should limit in-person visits with customers or contractors to the greatest extent.

### EMPLOYEE ACKNOWLEDGMENT

I understand that the Company is providing the personal protective equipment and other safety measures described above and agree to use it/follow them as required and to follow the above procedures to protect my health and the health of others. I understand that failure to do so may result in discipline, up to and including termination of employment. If, at any time, I have any concerns regarding how to work safely and protect my health or the health of others, I will contact a supervisor.

\_\_\_\_\_  
Signature

Employee name (PLEASE PRINT): \_\_\_\_\_

Date: \_\_\_\_\_