Where to Start

Getting back to business in a COVID-19 environment

CDC and OSHA recommendations and requirements for companies and organizations of all sizes
There is a lot of information out there to “help” businesses get back to work, or increase their current operations as we as a state and country attempt to “normalize” the new landscape.

In this effort that we all share, **Ivy Tech Community College** has put together this information to help all businesses large and small to understand what is **required** and what is **recommended** by the regulating bodies covering working environments, the Centers for Disease Control (CDC), and the Occupational Safety and Health Administration (OSHA).

These procedures as well as other recommendations put forth by the state of Indiana, the Indiana Chamber of Commerce, and the Central Indiana Corporate Partnership (CICP) will help companies navigate the large amount of information currently being offered to the public.
These are the categories/sections that you will be learning about today:

- CDC Guiding principles
- OSHA Recommendations
- OSHA Requirements
The CDC has broken down their Coronavirus guidance into three distinct areas.

- Planning
- Social Distancing
- Cloth Face Coverings
CDC Guidelines

Each of these areas are broken down further to cover specific recommended tasks under each of the three areas.

We will cover each area in detail, and what actions are recommended for each
CDC Guidelines

The Planning guidelines are broken down into the following areas:

• General Businesses and Workplaces
• Cleaning and Disinfecting Your Facility
CDC Guidelines

• General Businesses and Workplaces

All employers need to consider how best to decrease the spread of COVID-19 and lower the impact in their workplace. The three areas to consider to do this is by:

1. Reducing any transmission among employees
2. Maintaining healthy business operations
3. Maintaining a healthy work environment
CDC Guidelines

• Reducing any transmission among employees means that employers should:
  ➢ Actively encourage sick employees to stay home
  ➢ Identify where and how workers might be exposed to COVID-19 at work
  ➢ Separate sick employees
  ➢ Educate employees about how they can reduce the spread of COVID-19
CDC Guidelines

• To Maintain healthy business operations
  ➢ Identify a workplace coordinator
    ➢ someone whom has the responsibility and authority to ensure a safe and healthy environment
  ➢ Implement flexible sick leave and supportive policies and practices
    ➢ So workers won’t feel pressured and afraid to remain home if they are sick
  ➢ Assess your essential functions
    ➢ If the activity puts your employees at risk, and it is not needed, stop doing it
  ➢ Determine how you will operate if absenteeism spikes
    ➢ If individuals do call in sick, how are you going to fill that void?
  ➢ Consider establishing policies and practices for social distancing
CDC Guidelines

- Maintaining a healthy work environment
  - Consider improving the engineering controls using the building ventilation system
  - Support respiratory etiquette and hand hygiene for employees, customers, and worksite visitors
  - Perform routine environmental cleaning and disinfection
  - Perform enhanced cleaning and disinfection after persons suspected/confirmed to have COVID-19 have been in the facility
  - Advise employees before traveling to take additional precautions
CDC Guidelines

• Cleaning and Disinfecting Your Facility

Besides basic personal hygiene, cleaning and disinfecting your facilities are the best ways to safeguard your employees and customers.

To start off, what is cleaning, and disinfecting¹?
Cleaning in regards to your Coronavirus plan is defined by the CDC as “the removal of foreign material (e.g., soil, and organic material) from objects and is normally accomplished using water with detergents or enzymatic products. Thorough cleaning is required before disinfection because of inorganic and organic materials that remain on surfaces.”
CDC Guidelines

Disinfection in regards to your Coronavirus plan is defined by the CDC as “a process that eliminates many or all pathogenic microorganisms, except bacterial spores, on inanimate objects.”
Cleaning and Disinfecting rules depend on what kind of surface you are cleaning. The CDC also provides additional guidelines for cleaning and disinfecting your building or facility if someone is sick.
CDC Guidelines

But what is sick?

42 Code of Federal Regulations (CFR) parts 70/71 Final Rule⁶ defines an ill person as someone who:
CDC Guidelines

1. Has a fever (has a measured temperature of 100.4 °F or greater, or feels warm to the touch, or gives a history of feeling feverish) accompanied by one or more of the following:

   i. skin rash
   ii. difficulty breathing
   iii. persistent cough
   iv. decreased consciousness or confusion of recent onset
   v. new unexplained bruising or bleeding (without previous injury)
   vi. persistent diarrhea
   vii. persistent vomiting (other than air sickness)
   viii. headache with stiff neck, or
   ix. appears obviously unwell
CDC Guidelines

Or

2. Has a fever that has persisted for more than 48 hours

3. Has symptoms or other indications of communicable disease
CDC Guidelines

But what is sick?

Now keep in mind, even if your employees do not meet the technical definition of “sick” it doesn’t mean additional precautions cannot be taken.
Cleaning directions put out by the CDC are fairly straightforward².

1. Regular cleaning staff can clean and disinfect community spaces.
   - Ensure they are trained on appropriate use of cleaning and disinfection chemicals.

2. Wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash.
   - Additional personal protective equipment (PPE) might be required based on the cleaning/disinfectant products being used and whether there is a risk of a splash.
   - Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area.
3. Wash your hands often with soap and water for 20 seconds.
   - Always wash immediately after removing gloves and after contact with a person who is sick.
   - Hand sanitizer: If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains at least 60% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.
   - Additional key times to wash hands include:
     - After blowing one’s nose, coughing, or sneezing.
     - After using the restroom.
     - Before eating or preparing food.
     - After contact with animals or pets.
     - Before and after providing routine care for another person who needs assistance (e.g., a child).
4. Practice routine cleaning of frequently touched (High touch) surfaces.

• More frequent cleaning and disinfection may be required based on level of use.

• Surfaces and objects in public places, such as shopping carts and point of sale keypads should be cleaned and disinfected before each use.

• High touch surfaces include:
  • Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.
Disinfecting directions put out by the CDC are a little more complicated, depending on the surface being disinfected, but we will help you break it down.

1. Use only recommend EPA-registered disinfectants for this process.
2. Follow the instructions on the label to ensure safe and effective use of the product.
3. Bleach solutions will be effective for disinfection up to 24 hours.
4. Alcohol solutions with at least 70% alcohol may also be used.
CDC Guidelines

Household Chlorine bleach is probably the easiest and cheapest disinfectant currently available, so we are providing you the CDC guidance on making your own disinfectant.

1. Check the label to see if your bleach is intended for disinfection, and ensure the product is **not** past its expiration date. (Chlorine degrades over time)
   - Some bleaches, such as those designed for safe use on colored clothing or for whitening may not be suitable for disinfection.

2. Unexpired household bleach will be effective against coronaviruses when properly diluted.
3. Follow the manufacturer’s instructions for application and proper ventilation. (very important, Chlorine fumes can be very harmful at elevated concentrations.)
   - Never mix household bleach with ammonia or any other cleanser.

4. To make a bleach solution, mix:
   - 5 tablespoons (1/3 cup) bleach per gallon of water OR 4 teaspoons bleach per quart of water

Leave solution on the surface for at least 1 minute.
CDC Guidelines

Cleaning and Disinfecting Soft surfaces

For soft surfaces such as carpeted floor, rugs, and drapes

• Clean the surface using soap and water or with cleaners appropriate for use on these surfaces.
• Launder items (if possible) according to the manufacturer’s instructions.
  • Use the warmest appropriate water setting and dry items completely.
• Disinfect with an EPA-registered household disinfectant.
• Vacuum as usual.
CDC Guidelines

Cleaning and Disinfecting Electronics

For electronics, such as tablets, touch screens, keyboards, remote controls, and ATM machines

• Consider putting a wipeable cover on electronics.

• Follow manufacturer’s instruction for cleaning and disinfecting.
  • If no guidance, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly before use.
CDC Guidelines

Cleaning and Disinfecting Laundry

For clothing, towels, linens and other items

• Launder items according to the manufacturer’s instructions.
  • Use the warmest appropriate water setting and dry items completely.
• Wear disposable gloves when handling dirty laundry from a person who is sick.
  • Dirty laundry from a person who is sick can be washed with other people’s items.
• Do not shake dirty laundry.
• Clean and disinfect clothes hampers according to guidance for the type of surface.
• Remove gloves, and wash hands right away.
CDC Guidelines

Cleaning and disinfecting outdoor areas

• Outdoor areas, like playgrounds in schools and parks generally require normal routine cleaning, but do not require disinfection.

• Sidewalks and roads should not be disinfected.
Special guidance is given from the CDC if you have someone in your building or facility that has become, or is sick.

Out of an abundance of precaution due to the highly contagious nature of COVID-19, as well as the many different symptoms associated with this disease, a confirmed case of COVID-19 is not required to warrant these additional cleaning precautions and steps.
CDC Guidelines

Cleaning and disinfecting your building or facility if someone is sick

• Close off areas used by the person who is sick.
  • Companies do not necessarily need to close operations, if they can close off affected areas.

• Open outside doors and windows to increase air circulation in the area.

• Wait 24 hours before you clean or disinfect.
  • If 24 hours is not feasible, wait as long as possible.

• Clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls, and ATM machines.
CDC Guidelines

Cleaning and disinfecting your building or facility if someone is sick

• Vacuum the space if needed. Use a vacuum equipped with high-efficiency particular air (HEPA) filter, if available.
  • Do not vacuum a room or space that has people in it. Wait until the room or space is empty to vacuum, such as at night, for common spaces, or during the day for private rooms.
  • Consider temporarily turning off room fans and the central HVAC system that services the room or space, so that particles that escape from vacuuming will not circulate throughout the facility.

• Once area has been appropriately disinfected, it can be opened for use.
  • Workers without close contact with the person who is sick can return to work immediately after disinfection.
CDC Guidelines

Cleaning and disinfecting your building or facility if someone is sick

- If more than 7 days since the person who is sick visited or used the facility, additional cleaning and disinfection is not necessary.

- Continue routing cleaning and disinfection. This includes everyday practices that businesses and communities normally use to maintain a healthy environment.
CDC Guidelines

Social Distancing guidelines are broken down into the following areas:

• What is Social Distancing
• Why is Social Distancing important
• Tips when using Social Distancing
What is Social Distancing

Social distancing, also called “physical distancing,” means keeping space between yourself and other people outside of your home. Keeping space between you and others is one of the best tools we have to avoid being exposed to this virus and to slow its spread.
CDC Guidelines

What is Social Distancing

• Stay at least 6 feet (about 2 arms’ length) from other people

• Do not gather in groups
  • Guidance for what constitutes a group in a given sector of society has been specified by Gov. Holcomb in the following slide

• Stay out of crowded places and avoid mass gatherings
# BACK ON TRACK INDIANA PLAN EXPLAINED

## Key
- **Closed/Virtual Only**
- **Essential Only**
- **75% Capacity**
- **Fully Open with Social Distancing**
- **Pickup and Delivery Only**
- **50% Capacity**
- **Open with Restrictions**

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Note: This roadmap is subject to change based on CDC guidance and other new information. Local governments may impose more restrictive guidelines. Stage 2 will begin on May 11 for Lake and Marion counties and May 18 for Cass County.

*Visit backontrack.in.gov for more information and guidelines for reopening Indiana and industry specific guidance for face coverings, etc.*
Why is Social Distancing important

COVID-19 spreads mainly among people who are in close contact (within about 6 feet) for a prolonged period, through respiratory droplets produced when an infected person coughs, sneezes or talks. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. Studies have suggested that COVID-19 may be spread by people who are not showing symptoms.
CDC Guidelines

Tips for social distancing

• Cover your mouth and nose with a cloth face covering when around others, including when you have to go out in public, for example to the grocery store.

• Keep at least 6 feet between yourself and others, even when you wear a face covering.

• Work from home when possible.

• Avoid using any kind of public transportation, ridesharing, or taxis, if possible.
CDC Guidelines

The guidelines for Cloth Face Covering are simple to follow, and will help protect your workers and customers:

The CDC recommends that whenever you are in a public setting where other social distancing measures are difficult to maintain, which for a business is vitally important, face coverings are significant in the reduction of community-based transmission.

Please keep in mind, Cloth face coverings are NOT the same as the medical facemasks, surgical masks, or respirators (such as N95 respirators) worn by healthcare personnel, first responders, and workers in other industries.
Not all face coverings are NIOSH approved

National Institute for Occupational Safety and Health (NIOSH) approved N95 and higher respiratory protection masks and respirators are considered personal protective equipment (PPE) as defined by OSHA. This type of PPE should be used by healthcare personnel, first responders, or as directed in OSHA respiratory directives for personnel protection. Individuals that require NIOSH approved PPE should not wear cloth face coverings when the use of NIOSH respirators or facemasks are indicated.
CDC Guidelines

The guidelines for Cloth Face Covering are simple to follow, and will help protect your workers and customers:

Cloth face coverings should not be placed on young children younger than 2 years of age, anyone who has trouble breathing, or is unconscious, incapacitated or otherwise unable to remove the cover without assistance.
The Occupational Safety and Health Administration have developed their own recommendations as well as requirements based on the Occupational Safety and Health (OSH) Act of 1970. Because there are no specific reference to SARS-CoV-2 (COVID-19, and Coronavirus), OSHA references the General Duty Clause, Section 5(a)(1) of the act which states:
OSHA Guidelines

SEC. 5. Duties

(a) Each employer –

(1) shall furnish to each of his employees 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 to his employees;

(2) shall comply with occupational safety and health standards promulgated under this Act.

(b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.
Now keep in mind, OSHA is in the job of ensuring employees’ safety. They may not be the subject matter experts on all things. For this reason, they look to outside experts for guidance. Much of OSHA’s recommendations are identical to the CDC guidelines. The reason for this is because that is where they got their information. Because of that, much of these recommendations are similar if not direct copies of CDC guiding principles.
OSHA Guidelines

To start off, we’ll provide a refresher of what OSHA means by several commonly used terms in regards to COVID-19.

- The Hierarchy of Control
- Engineering Controls
- Administrative Controls
- PPE
OSHA Guidelines

The terms Engineering Controls, Administrative Controls, and PPE are used throughout OSHA provided information. So a brief definition of what exactly is meant by them is warranted.
OSHA Guidelines

The Hierarchy of Control:

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions.
OSHA Guidelines

Hierarchy of Controls

- **Elimination**: Physically remove the hazard
- **Substitution**: Replace the hazard
- **Engineering Controls**: Isolate people from the hazard
- **Administrative Controls**: Change the way people work
- **PPE**: Protect the worker with Personal Protective Equipment
OSHA Guidelines

If you notice, the Hierarchy of Control lists Elimination and Substitution as a higher priority than of Engineering Controls, Administrative Controls, and PPE. But because you, as an employer, do not have the ability to eliminate or substitute one hazard for another in the Coronavirus environment, they are not mentioned in OSHA guidance.
OSHA Guidelines

Engineering Controls:

Engineering controls protect workers by removing hazardous conditions or by placing a barrier between the worker and the hazard. Examples include local exhaust ventilation to capture and remove airborne emissions and/or clear plastic sneeze guards.
OSHA Guidelines

Administrative Controls:

Administrative controls (or work practice controls) are changes in work procedures such as written safety policies, rules, supervision, schedules, and training with the goal of reducing the duration, frequency, and severity of exposure to hazardous chemicals or situations.
OSHA Guidelines

PPE:

Personal protective equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical, or other workplace hazards. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, vests and full body suits. It is the last line of defense. Using PPE means the hazard is present, and dangerous to your employees.
OSHA Recommendations

Employers should treat OSHA’s guidance as recommended best practices intended to help them comply with their obligations under the General Duty Clause.

a) Develop an infectious disease preparedness and response plan
   i. Plans should include information as to where, how, and what sources of SARS-CoV-2 (COVID19) might workers be exposed, including:
      1) The general public, customers, and coworkers
      2) Sick individuals or those at particularly high risk of infection (e.g., international travelers who have visited locations with widespread ongoing contagions
      3) Healthcare workers who have had unprotected exposures to people known to have, or suspected of having COVID-19.
OSHA Recommendations

ii. Non-occupational risk factors that may exist at home and in community settings.

iii. Workers’ individual risk factors (e.g., older age; presence of chronic medical conditions, including immunocompromising conditions; pregnancy).

iv. Controls that may be necessary to address and control these risks.
b) Follow all federal, state, and local recommendations regarding development of contingency plans for situations that may arise as a result of outbreaks. These plans should include information on:

i. Increased rates of worker absenteeism.

ii. The need for social distancing, staggered work shifts, downsizing operations, delivering services remotely, and other exposure-reducing measures.

iii. Options for conducting essential operations with a reduced workforce, including cross-training workers across different jobs in order to continue operations or deliver surge services.

iv. Interrupted supply chains or delayed deliveries.
OSHA Recommendations

c) Prepare to implement basic infection prevention measures to include:

iii. Promote frequent and thorough hand washing (minimum of 20 seconds)

iv. Encourage workers to stay home if they are sick.

v. Encourage respiratory etiquette, including covering coughs and sneezes.

vi. Provide customers and the public with tissues and trash receptacles.
vii. Employers should explore whether they can establish policies and practices, such as flexible worksites and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees and between employees using social distancing strategies.

viii. Discourage workers from using other workers’ phones, desks, offices, or other work tools and equipment, when possible.

ix. Maintain regular housekeeping practices, including routine cleaning and disinfecting.
OSHA Recommendations

d) Develop policies and procedures for prompt identification and isolation of sick people, if appropriate encourage workers to stay home if they are sick.

i. Prompt identification and isolation of potentially infectious individuals

ii. Employers should inform and encourage employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure.

iii. Employers should develop policies and procedures for employees to report when they are sick or experiencing symptoms of COVID-19.
OSHA Recommendations

iv. Where appropriate, employers should develop policies and procedures for immediately isolating people who have signs and/or symptoms of COVID-19.

v. Take steps to limit spread of the respiratory secretions of a person who may have COVID-19. Provide a face mask, if feasible and available, and ask the person to wear it, if tolerated.

   a) A face mask (also called a surgical mask, procedure mask, or other similar terms) should not be confused with PPE; the mask acts to contain potentially infectious respiratory secretions at the source (i.e., the person’s nose and mouth).

vi. If possible, isolate people suspected of having COVID-19 separately from those with confirmed cases of the virus to prevent further transmission.

vii. Restrict the number of personnel entering isolation areas.

viii. Protect workers in close contact with (i.e., within 6 feet of) a sick person or who have prolonged/repeated contact with such persons by using additional engineering and administrative controls, safe work practices, and PPE.
OSHA Recommendations

ix. Develop, implement, and communicate about workplace flexibilities and protections

x. Actively encourage sick employees to stay home.

xi. Ensure that sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies.

xii. Talk with companies that provide your business with contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

xiii. Do not require a healthcare provider’s note for employees who are sick with acute respiratory illness to validate their illness or to return to work.

xiv. Maintain flexible policies that permit employees to stay home to care for a sick family member.
OSHA Recommendations

xv. Recognize that workers with ill family members may need to stay home to care for them.

xvi. Be aware of workers’ concerns about pay, leave, safety, health, and other issues that may arise during infectious disease outbreaks.

a) Provide adequate, usable, and appropriate training, education, and informational material about business-essential job functions and worker health and safety, including proper hygiene practices and the use of any workplace controls (including PPE).
OSHA Recommendations

e) Implement Workplace Controls

i. Engineering Controls: examples

a) Installing high-efficiency air filters.

b) Increasing ventilation rates in the work environment.

c) Installing physical barriers, such as clear plastic sneeze guards.
ii. Implement Administrative Controls:

- a) Encouraging sick workers to stay at home.
- b) Minimizing contact among workers, clients, and customers by replacing face-to-face meetings with virtual communications and implementing telework if feasible.
- c) Establishing alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full onsite work week.
- d) Discontinuing nonessential travel to locations with ongoing COVID-19 outbreaks.
- e) Developing emergency communications plans.
- f) Provide up-to-date education and training on COVID-19 risk factors and protective behaviors (e.g. cough etiquette and care of PPE).
OSHA Recommendations

f) Safe Work Practices
   
a) Provide resources and work environments that promote proper personal hygiene.

b) Require regular hand washing or using of alcohol-based hand rubs.

c) Post handwashing signs in restrooms.
OSHA Requirements

No specific OSHA standard covering SARS-CoV-2 (Coronavirus) exposure exists, some OSHA requirements may apply to preventing occupational exposure to SARS-CoV-2.

So as an employer, guidelines must be followed to ensure the safety of your employees.
OSHA Requirements

A. The General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health (OSH) Act of 1970, 29 USC 654(a)(1), which 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.”
OSHA Requirements

B. OSHA’s Personal Protective Equipment (PPE) standards (in general industry, 29 CFR 1910 Subpart I),

3) General Requirements (1910.132)

4) When respirators are necessary to protect workers or where employers require respirator use, employers must implement a comprehensive respiratory protection program in accordance with the Respiratory Protection standard (29 CFR 1910.134).

5) Eye and Face Protection (1910.133)

6) Hand Protection (1910.138)
OSHA Requirements

C. Toxic and Hazardous Substances (Subpart Z)

1) OSHA’s Bloodborne Pathogens standard (29 CFR 1910.1030) applies to occupational exposure to human blood and other potentially infectious materials they typically do not include respiratory secretions that may transmit SARS-CoV-2.

   i. However, the provisions of the standard offer a framework that may help control some sources of the virus, including exposures to body fluids (e.g., respiratory secretions) not covered by the standard.

2) Hazard Communication (1910.1200)

3) Access to employee exposure and medical records (1910.1020)
OSHA requires identifying four categories of risk to describe a workplace.

Occupational Risk Pyramid for COVID-19
OSHA Requirements

OSHA’s categories of risk for COVID-19

A. **Very High**: Jobs with a high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedure such as health care or morgue workers handling specimens from patients or bodies of persons known to have COVID-19.

B. **High**: Jobs with a high potential for exposure to known or suspected sources of COVID-19 such as healthcare delivery and support, medical transport, employees that are exposed to known or suspected COVID-19 patients.
OSHA Requirements

OSHA’s categories of risk for COVID-19

C. **Medium**: Jobs that require frequent/close contact with people who **may** be infected, but who are not known or suspected patients such as those who may have contact with the **general public** (e.g., schools, high-population-density work environments, some high-volume retail settings), including individuals returning from locations with widespread COVID-19 transmission.

D. **Lower Risk**: Jobs that do not require contact with people known to be, or suspected of being, infected such as workers that have minimal occupational contact with the public and other coworkers.
OSHA Requirements

Protections required for Lower Exposure Risk

A. Engineering Controls
   I. Additional engineering controls are not recommended

B. Administrative Controls
   I. Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information.
   II. Collaborate with workers to designate effective means of communicating important COVID-19 information.

C. Personal Protective Equipment
   I. Additional PPE is not recommended
OSHA Requirements

Protections required for Medium Risk

A. Engineering Controls
   I. Install physical barriers, such as clear plastic sneeze guards, where feasible

B. Administrative Controls
   I. Consider offering face masks to ill employees and customers to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home). In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission.
   
   II. Keep customers informed about symptoms of COVID-19 and ask sick customers to minimize contact with workers until healthy again, such as by posting signs about COVID-19 in stores where sick customers may visit.
   
   III. Where appropriate, limit customer and the public access to the worksite, or restrict access to only certain workplace areas.
OSHA Requirements

Protections required for **Medium Risk**

IV. Consider strategies to minimize face-to-face contact (e.g., drive-through windows, phone-based communication, telework).

V. Communicate the availability of medical screening or other worker health resources (e.g., on-site nurse; telemedicine services).

C. Personal Protective Equipment

I. Each employer should select the combination of PPE that protects workers specific to their workplace.

   a) Workers with medium exposure risk may need to wear some combination of gloves, a gown, a **face mask**, and/or a face shield or goggles. PPE for workers in the medium exposure risk category will vary by work task, the results of the employer’s hazard assessment, and the types of exposures workers have on the job.
OSHA Requirements

Protections required for High or Very High Exposure Risk

A. Engineering Controls

I. Ensure appropriate air-handling systems are installed and maintained in healthcare facilities.

II. CDC recommends that patients with known or suspected COVID-19 (i.e., person under investigation) should be placed in an airborne infection isolation room (AIIR), if available.

III. Use isolation rooms when available for performing aerosol-generating procedures on patients with known or suspected COVID-19. Use special precautions associated with Biosafety Level 3 when handling specimens from known or suspected COVID-19 patients.
OSHA Requirements

Protections required for **High or Very High Exposure Risk**

B. Administrative Controls

I. Develop and implement policies that reduce exposure, such as grouping COVID-19 patients when single rooms are not available.

II. Post signs requesting patients and family members to immediately report symptoms of respiratory illness on arrival at the healthcare facility and use disposable face masks.

III. Consider offering enhanced medical monitoring of workers during COVID-19 outbreaks.

IV. Provide all workers with job-specific education and training on preventing transmission of COVID-19, including initial and routine/refresher training.

V. Ensure that psychological and behavioral support is available to address employee stress.
OSHA Requirements

Protections required for **High or Very High Exposure Risk**

C. Safe Work Practices
   
   I. Provide emergency responders and other essential personnel who may be exposed while working away from fixed facilities with alcohol-based hand rubs containing at least 60% alcohol for decontamination in the field.

D. Personal Protective Equipment (PPE)
   
   III. Workers at high or very high exposure risk need to wear gloves, a gown, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks.

   IV. Those who work closely with (either in contact with or within 6 feet of) patients known to be, or suspected of being, infected with SARS-CoV-2, the virus that causes COVID-19, should wear respirators.
OSHA Requirements

Clarification on what PPE is required for each risk level

Remember, PPE is the last line of defense to protect your employees

C. Low and Medium Risk categories
   iii. NIOSH approved PPE not required
   iv. CDC recommended face covering guidelines highly encouraged

D. High and very High risk categories
   i. NIOSH N95 or higher approved PPE required
Employers have a requirement to keep records of workplace injuries.  

A. OSHA has said that incidents of employees contracting COVID-19 are recordable illnesses under the following criteria:

i. The case is confirmed as a COVID-19 illness;

ii. The employee exposure is work-related as defined by 29 CFR 1904.5;

and

i. The case involves one or more of the general recording criteria in 29 CFR 1904.7, such as medical treatment beyond first aid or days away from work.
OSHA Requirements

Because of the extraordinary circumstances as well as the large amount of information out in the public sphere, OSHA has taken extra efforts to confirm employer compliance.

OSHA will take an employer’s good faith effort to comply with workplace safety requirements into consideration before deciding whether to issue a citation for a violation.
OSHA Requirements

A. The guidance to OSHA inspectors specifies that during an inspection, compliance safety and health officers should assess an employer’s efforts to comply with standards that require annual or recurring audits, reviews, training or assessments. Officers should evaluate if the employer:

i. Explored all options to comply with applicable standards (e.g., use of virtual training or remote communication strategies);

ii. Implemented interim alternative protections, such as engineering or administrative controls;

iii. Rescheduled required annual activity as soon as possible.

iv. The agency may issue a citation if it finds an employer cannot demonstrate any efforts to comply.
The information provided in the preceding document has been given in hopes of giving clarification and explanations in order to “help” businesses get back to work, as safely as possible, in compliance with governmental guidelines.

Ivy Tech hopes this information will be useful for employers of all sizes, as well as providing employees a sense of safety when it comes to their work environments.
If you have any additional safety questions, or would like information on any other type of non-credit, short term, customizable training opportunities, please feel free to contact your local Ivy Tech Workforce Alignment partner by selecting the contact drop-down at

www.ivytech.edu/workforce
References

4. https://backontrack.in.gov/2348.htm