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# SUMMARY ON OSHA GUIDELINES TO PREPARE FOR COVID-19

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# Summary on OSHA Guidelines to Prepare for COVID-19

## **COVID-19**

The OSHA guideline defines Coronavirus Disease 2019 (COVID-19) as a respiratory disease caused by the SARS-CoV-2 virus. Infection with can cause illness ranging from mild to severe and, in some cases, can be fatal. Symptoms typically include fever, cough, and shortness of breath. Some people infected with the virus have reported experiencing other non-respiratory symptoms. Other people, referred to as asymptomatic cases, have experienced no symptoms at all.

Symptoms can appear anywhere from 2 to 14 days after exposure.

The virus is thought to spread mainly through people who are in close contact with each other (6 feet), and through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It may also spread through touching surfaces or objects with the virus on it, then proceeding to touch your mouth, nose, or even eyes.

The OSHA guideline considers the different ways COVID-19 can affect the workplace including:

- Absenteeism of workers because they are sick; are caregivers for sick family members or children in cases where schools and daycares are closed; have at-risk family members at home; are afraid to come into work due to possible exposure.
- Change in patterns of commerce due to consumer demands shifting towards items/services related to preventing infection.
- Interrupted supply/delivery as shipments from affected regions may be delayed or cancelled.

OSHA recommends the following steps to reduce workers risk of exposure:

### ***Develop Infectious Disease Preparedness & Response Plan***

- Stay updated on guidance from government health agencies and how to incorporate and follow recommendations in response plan.
- Consider & address levels of risk such as where and how workers might be exposed including their home and communities, workers individual risk factors and the controls required to address these risks.

### ***Prepare Implementation of Basic Infection Prevention Measures***

- Promote frequent & thorough hand washing or use of hand sanitizer with 60% alcohol content and respiratory etiquette to cover sneezes and coughs along with continuing regular housekeeping activities.
- Encourage sick workers to stay home and explore establishing policies and procedures such as flexible worksites and work hours, increasing physical distancing and discourage the use of others phones, desks, computers, work tools and equipment.

## ***Develop Policies and Procedures for Prompt Identification and Isolation of Sick People, if Appropriate***

- Employers should inform & encourage self-monitoring for signs and symptoms of COVID-19
- Develop policies and procedures for employees to report when they are sick or experiencing symptoms including, when appropriate, procedures to immediately isolate potentially infectious people by moving them to a location away from other workers, clients and visitors and providing them with a mask if tolerated. Employers should not require a healthcare providers note for those who are sick and should ensure that sick leave policies are flexible, consistent and communicated to employees.
- Protect workers who remain in contact with the general public and those who are known or suspected to be infected by restricting the number of personnel entering restricted areas and by using additional workplace controls cited below.
- Be aware of workers concern for pay, leave, safety, health and provide appropriate training, education & information about essential jobs functions and worker health and safety.

## ***Implement Workplace Controls***

OSHA guidelines recommend the best way to protect workers is through a combination of the below workplace control actions.

**Engineering Controls** are such that involve isolating employees from work related hazards without the need for worker behavior. Listed as examples are: installing high-efficiency air filters; increasing ventilation rates; installing physical barriers such as clear plastic sneeze guards and a drive-through window for customer service; specialized negative pressure ventilation in some settings.

**Administrative Controls** are those that require action from the worker or employer to reduce exposure such as the changes in policy discussed in the previous section as well as discontinuing non-essential travel, and providing up to date training on COVID-19 risk factors and PPE.

**Safe Work Practices** are listed as a type of administrative controls. These are procedures for continued safe and proper work such as providing resources that promote good hygiene, requiring regular hand washing or use of alcohol-based sanitizer.

### **Personal Protective Equipment (PPE)**

Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs, these can include gloves, goggles, face shields, face masks, and respiratory protection. OSHA recommends equipment be selected based upon hazard to worker, properly fitted and periodically refitted, consistently and properly worn, regularly inspected, properly removed, cleaned and stored or disposed of.

In addition to workplace controls the OSHA guideline recommends CDC guidance for businesses provides employers and workers to implement in workplaces: <https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/guidance-business-response.html>

As well as continuing to **follow existing OSHA standards that may apply** : <https://www.osha.gov/SLTC/covid-19/standards.html>

## Worker Exposure and Recommended Protection Action

The OSHA guidelines recognizes that worker risk may vary depending on the industry type, need for contact within 6' of potentially infected people, or required repeated contact with such people.



The pyramid depicts the four exposure levels to represent the probable distribution of risk

### ***Very High Exposure Risk***

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

OSHA classifies very high risk exposure jobs as those with high potential for exposure to known or suspected sources of COVID-19 such as healthcare workers performing aerosol-generating procedures, healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients, and morgue workers performing autopsies on the bodies of people known or suspected to have COVID-19 at the time of death.

### ***High Exposure Risk***

OSHA classifies high exposure risk job as those with high potential for exposure known or suspected sources of COVID-19 such as helthcare delivery and support staff, medical transport workers, and mortuary workers.

### OSHA Recommended Action:

**Engineering Controls** - Ensure proper air-handling systems are installed and maintained, place known or suspected patients with COVID-19 in an airborne infection isolation room if available, use isolation rooms when performing aerosol-generating procedures on COVID-19 patients, and use special precautions associate with Biosafety Level 3 when handling specimens from COVID-19 patients. <https://www.cdc.gov/biosafety/publications/bmbl5/index.htm>

**Administrative Controls** - develop and implement policies to reduce exposure, post signs requesting immediately reporting symptoms of respiratory illness upon arrival and use of disposable masks, enhanced medical monitoring or workers during outbreak, provide all workers with job-specific education and training, and ensure that psychological and behavioral support is available.

**Safe Work Practices** - Provide workers and emergency responders with alcohol-based hand rubs containing at least 60% alcohol content while working away

**Personal Protective Equipment (PPE)** - OSHA advises most workers at high or very high exposure risk likely 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. For PPE guidance please reference <http://www.osha.gov/covid-19>

## **Medium Exposure Risk**

OSHA categorizes medium exposure risk jobs as those that require frequent and/or close contact with people who may be infected, workers who have frequent contact with general public or travelers who may return from locations with widespread COVID-19 transmission.

### OSHA Recommended Action:

**Engineering Controls** - install physical barriers where feasible

**Administrative controls** - offer face mask or a reusable face shield to ill employees until they are able to leave the workplace, keep customers informed about symptoms and ask sick customers to minimize contact with workers, limit access to worksites and workplace areas, minimize face-to-face contact, communicate medical screen availability.

**Personal Protective Equipment (PPE)** - consider providing workers with combination of gloves, a gown, a face mask/shield or goggles depending on the types of exposure workers have on the job.

## **Lower Exposure Risk (Caution)**

OSHA considers these jobs as those that do not require contact with people known or suspected to have COVID-19 nor frequent contact with the general public.

### OSHA Recommended Action:

**Engineering Controls**- OSHA does not recommend engineering controls for lower exposure risk workers.

**Administrative Controls** - OSHA recommends monitoring public health communications and collaboration with workers to designate effective means of communicating important information about COVID-19.

**Personal Protective Equipment (PPE)**- also not recommended.

## **For Workers Traveling Internationally**

- The OSHA guideline suggests consulting “Business Travelers” section of the OSHA Covid-19 webpage. [www.osha.gov/covid-19](http://www.osha.gov/covid-19)
- Employers should communicate to workers that the DOS cannot provide Americans traveling or living abroad with medications or supplies in the event during an outbreak. <http://travel.state.gov/>
- Plan appropriately for the possibility that travel into or out of the country may not be possible in the event of worsening outbreak. <http://www.cdc.gov/coronavirus/2019-ncov/travelers/index.html>

For the full guidelines please visit: <https://www.osha.gov/Publications/OSHA3990.pdf>

For more information about the OSHA recordkeeping requirements or the OSHA practice of Sheehy Ware & Pappas, visit our [website](#), or contact [Steven Grubbs](#), [Amanda Flanagan](#), [Joe Garnett](#), or [Alma Aguirre](#) to discuss your matter.