

# COVID-19 Return to Work 2.0 We're Back, Now What?

Ed Taube & Amber Pappas



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# Presenters

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# Goals

- Go beyond COVID-19 basic information
- Assist the business community as workplaces re-open and employees return to work.



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# Effects on Workplaces

- Changes to operations
- Reduced customer capacity
- Re-designed workspaces
- Stress and uncertainty



# How COVID-19 is Spread

## Primary Sources

- Large respiratory droplets

## Secondary Sources

- Prolonged contact with aerosols
- Contaminated surfaces

\* Reports of updated CDC guidance 5/20

## Virus Activity

- 3 hours in aerosol form
- 4 hours on copper
- 24 hours on cardboard
- 2-3 days on plastic or stainless steel



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# OSHA SEC.5.Duties-General Duty Clause

(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 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.



# Where Do *You* Start?

- Clean and sanitize your facility
- Assign a leader / safety task force
- Determine the exposure potential for your specific business and identify gaps
- Develop emergency preparedness and disease prevention plans
- Have a return to work orientation program



# Effective Communication

- Thoroughly communicate changes
- Be supportive and encourage two-way communication
- Focus on positive changes to reduce fear and anxiety
- Consider accommodations for other employee issues such as mental health or substance abuse





# OSHA Resources

[www.osha.gov/SLTC/covid-19/](http://www.osha.gov/SLTC/covid-19/)

- Standards
- Updates
- Hazard recognition
- Medical information
- Industry specific guidelines



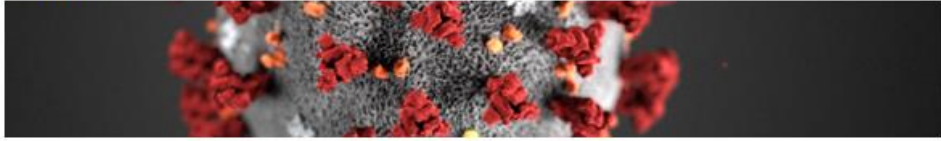
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# OSHA Resources

## COVID-19



### Overview



This webpage provides information for workers and employers about the evolving coronavirus pandemic. The information includes links to interim guidance and other resources for preventing exposures to, and infection with, the novel coronavirus—officially named SARS-CoV-2, which causes the Coronavirus Disease 2019 (COVID-19).

[More >](#)

### News and Updates



Find the latest OSHA resources related to COVID-19, including:

- Updated Interim Enforcement Response Plan for Coronavirus Disease 2019 (COVID-19), (May 19, 2020)
- Revised Enforcement Guidance for Recording Codes of Coronavirus Disease 2019 (COVID-19), (May 19, 2020)
- COVID-19 Guidance for Nursing Home and Long Term Care Facility Workers (Spanish), (May 14, 2020)

[More >](#)

### Highlights

- Guidance on Preparing Workplaces for COVID-19 (Spanish)
- Worker Exposure Risk to COVID-19 (Spanish)
- Guidance for specific industries
- OSHA Alerts:
  - Nursing Home and Long Term Care Facility Workers (Spanish)
  - Retail Pharmacies (Spanish)
  - Rideshare, Taxi, and Car Service Workers (Spanish)
  - Dental Practitioners (Spanish)
  - Restaurants & Beverage Vendors Offering Takeout or Curbside Pickup (Spanish)
  - Construction Workforce (Spanish)
  - Manufacturing Industry Workforce (Spanish)
  - Package Delivery Workforce (Spanish)
  - Retail Workers (Spanish)
  - Prevent Worker Exposure to Coronavirus (COVID-19) (Spanish)
- Enforcement guidance for:
  - Handling COVID-19-related complaints, referrals, and severe illness reports (Interim Enforcement Response Plan) (through May 25, 2020; on or after May 26, 2020)
  - Recording cases of COVID-19 (through May 25, 2020; on or after May 26, 2020)
  - Required annual fit-testing in healthcare and all other industries
  - Supply shortages of disposable N95 filtering facepiece respirators (FFRs)
  - Use of respiratory protection equipment certified under standards of other countries
  - Decontamination of FFRs in healthcare
  - Considering employers' good faith efforts to comply with OSHA-mandated training, audits, assessments, inspections, and testing

### Quick Facts

- Existing OSHA standards apply to protect workers from SARS-CoV-2, the novel coronavirus that causes the respiratory disease known as COVID-19.
- Signs and symptoms of COVID-19 include cough, shortness of breath, and difficulty breathing. The U.S. Center for Disease Control

### Medical Information



Take steps to prevent worker exposure to SARS-CoV-2:

- What is a coronavirus?
- How is SARS-CoV-2 different from other coronaviruses?
- What are the signs and symptoms of COVID-19?
- What should I do if I think I have been exposed to or infected with SARS-CoV-2?
- How is COVID-19 diagnosed?
- How is COVID-19 treated?
- Am I at high risk for complications from COVID-19?
- When can I return to work after having COVID-19?

[More >](#)

### Control and Prevention



OSHA provides guidance and resources for employers and workers on the control and prevention of COVID-19. Some sections of this guidance apply to all workers and employers, while other sections focus on those at lower risk of exposure and those with increased risk of exposure, including workers involved in:

- Healthcare
- Dentistry
- Emergency response and public safety
- Postmortem care
- Manufacturing (developed in partnership with CDC)
- Meat and poultry processing (developed in partnership with CDC)
- Laboratories
- Airline operations
- Retail operations
- Border protection and transportation security
- Correctional facility operations
- Solid waste and wastewater management
- Environmental (i.e., janitorial) services
- In-home repair services
- Business travelers

[More >](#)

### Hazard Recognition



- Risk to workers in the United States
- Classifying risk of worker exposure to SARS-CoV-2
- How does COVID-19 spread?
- Identifying potential sources of exposure

[More >](#)

### Standards

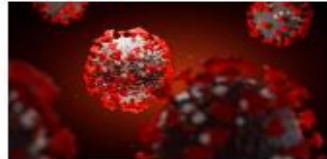


Understand how OSHA standards apply to protect workers from SARS-CoV-2.

- Key OSHA standards for COVID-19
- Enforcement discretion guidance
- Enforcement directives
- Workers' rights and employers' responsibilities

[More >](#)

### Background



Learn where COVID-19, and the SARS-CoV-2 virus that causes it, came from and how the pandemic is thought to have started.

### Additional Resources



Find additional resources and information for protecting workers during the COVID-19 pandemic, including from occupational exposure to SARS-CoV-2.




# Job Hazard/Safety Analysis

- Break down jobs into tasks/steps
- Identify potential risks or hazards
- Specify controls



# Job Hazard/Safety Analysis

 <b>JOB SAFETY ANALYSIS</b> <i>Instructions On Reverse Side</i>	Job Title (And Number If Applicable):		Date:	Page __ Of __
	<input type="checkbox"/> New <input type="checkbox"/> Revised		Title Of Job Performer:	Supervisor:
Company/Organization:	Plant/Location:	Department:	Reviewed By:	
Required and/or Recommended Personal Protective Equipment:			Approved By:	
Sequence of Basic Job Steps	Potential Hazards	Recommended Action or Procedure		

Printed in U.S.A.

# Emergency Preparedness

Create an emergency action plan

OSHA Evacuation Plans and Procedures eTool



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# Disease Prevention Preparedness

## Industrial Hygiene Hazard Types

Physical

**Biological**

Ergonomics

**Chemical**

## Industrial Hygiene Process

Anticipation

Recognition

Evaluation

Control

Confirm

- Bloodborne Pathogens Standard (29 CFR 1910.1030)
- Personal Protective Equipment Standard (29 CFR 1910.132)
- Respiratory Protection Standard (29 CFR 1910.134)

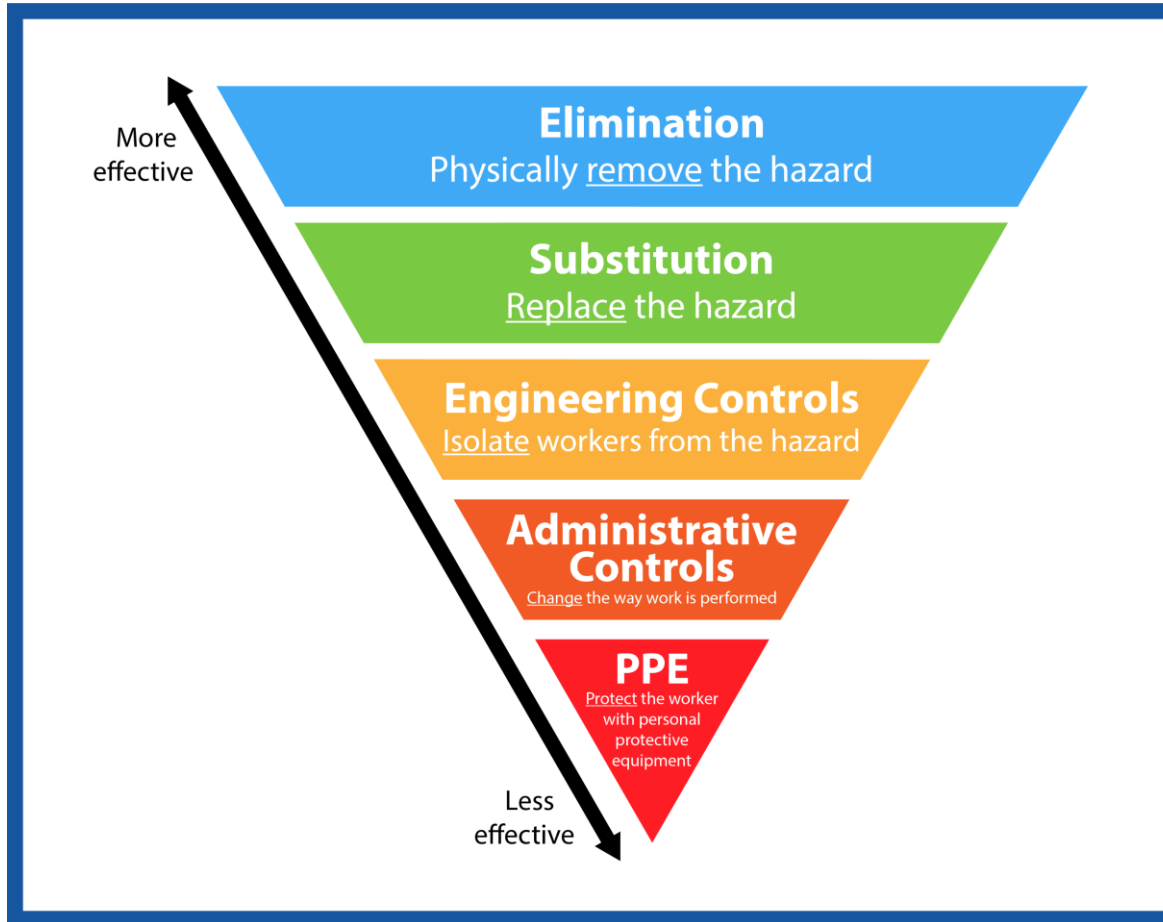


# General Precautions

- Stay at home policies
- Social distancing
- Respiratory etiquette
- Hygiene & sanitizing policies
- Personal protection equipment

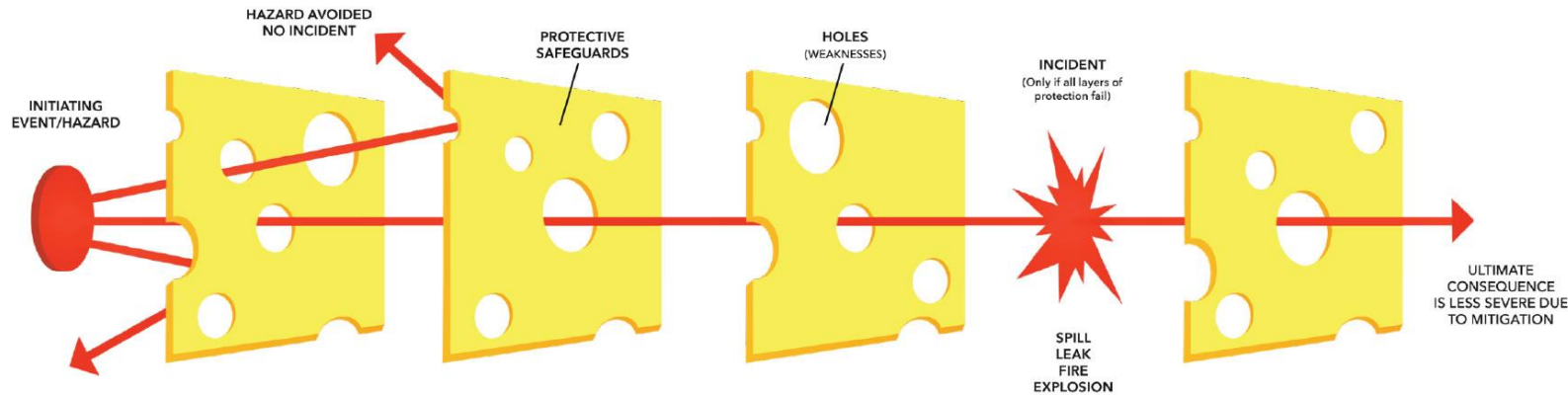


# Hierarchy of Controls





# Swiss Cheese Model



## Engineering Controls

- Safer Design
- Instrumentation in Protective Systems
- Isolation of Hazardous Energy (Lockout/Tagout)

## Administrative Controls

- Safe Lab Procedures
- Chemical Hygiene Plan
- Job Safety Analysis
- Management of Change
- Safe Work Practices

## Behavioral Controls

- Use Personal Protective Equipment (PPE)
- Use the Right Tools
- Use Stop-Work Authority
- Follow Lab Procedures

## Post-Incident Mitigation

- Emergency Response Plan
- Fire Suppression
- Safe Work Practices

\* Adapted from the Swiss Cheese Model originally developed by James Reason



# Engineering Controls

- Increased ventilation
- Physical barriers
- Re-configuring workspaces or production lines
- Touch free rest room faucets and towel dispensers



# Administrative Controls

- Working remotely
- Staggered work hours
- Safe work practices
- Travel policies
- Disinfecting and hygiene procedures
- Signage
- Education and training



# PPE

Proper evaluation and selection of face coverings, gloves, gowns, etc.

Training on proper fit, use, care, and disposal.



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# OSHA Recordkeeping & Reporting

29CFR 1904.5 Determination of Work Relatedness

29CFR 1904.7 General Recording Criteria



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# OSHA Form 300

OSHA's Form 300 (Rev. 01/2004)

## Log of Work-Related Injuries and Illnesses

**Attention:** This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20\_\_ \_\_  
**U.S. Department of Labor**  
 Occupational Safety and Health Administration



Form approved OMB no. 1218-0176

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12. Feel free to use two lines for a single case if you need to. You must complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.

Establishment name \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_

Identify the person			Describe the case			Classify the case				Enter the number of days the injured or ill worker was:		Check the "Injury" column or choose one type of illness:					
(A) Case no.	(B) Employee's name	(C) Job title (e.g., Welder)	(D) Date of injury or onset of illness	(E) Where the event occurred (e.g., Loading dock north end)	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., Second degree burns on right forearm from acetylene torch)	CHECK ONLY ONE box for each case based on the most serious outcome for that case:				Away from work (K)	On job transfer or restriction (L)	(M)					
						Remained at Work											
						Death (G)	Days away from work (H)	Job transfer or restriction (I)	Other recordable cases (J)			Injury (1)	Skin disorder (2)	Respiratory condition (3)	Poisoning (4)	Hearing loss (5)	All other illnesses (6)
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 Be sure to transfer these totals to the Summary page (Form 300A) before you post it.

Page \_\_\_ of \_\_\_  
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Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.



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# Infection Protocol

**Primary** - Individual has been diagnosed with COVID-19

**Primary symptoms/direct exposure** - Team members have been indirect contact with Primary Individual or Primary Individual who has COVID-19 symptoms

**Secondary** - Secondary team member has been in contact with a Direct Exposure team member, but not the Primary Individual

**Tertiary** - Tertiary Team Member has been in contact with a Secondary Exposure Team Member



# Procedures Before Return

- Additional screening measures
- Interviews / Questionnaires / Signed Affidavits
- Medical history
- Temperature checks





# HR Considerations

- HIPAA - regulates health care providers and insurers
- OSHA - many HR policies are related to OSHA compliance
- ADA - Equal opportunity laws for people with disabilities
- EEOC - anti-discrimination laws including age and disabilities



# ADA/EEOC Considerations

- Pandemic declared
- Direct threat
- Disability-related inquiries
- Medical examination
- Reasonable accommodations



# Contingency Plans

As restrictions are lifted, the disease rates could rise again.

It is important to have plans in place in case you will need to shut down again.

There have been other pandemics in the past and there will be others in the future.

**Failure to plan is planning to fail!**



Planning

+

Adaptability

=

Success!



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# Questions ?



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# Resources

<https://azgovernor.gov/executive-orders>

<https://www.cdc.gov/coronavirus/2019-ncov/index.html>

<https://www.osha.gov/SLTC/etools/evacuation/expertsystem/emergencyplan.html>

<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

<https://www.eeoc.gov/coronavirus>

<https://www.azdhs.gov/>

<https://www.nsc.org/work-safety/safety-topics/safe-actions-for-employee-returns-safer>

<https://premierlabsolutions.com/>

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