COVID-19 Workplace Guidelines

EMPLOYER'S GUIDE

WORKPLACE SAFETY AND HEALTH

For additional guidelines, click here: Manufacturing/Construction.

Important Note:

The best practice and guidance information provided in this presentation, follows information and guidance provided through the CDC and OSHA, **as of May 4, 2020**

Employers should continue to review CDC and OSHA websites, to ensure their workplace policies and procedures are based on the most up-to-date information available.

Objectives

- Overview – Coronavirus & COVID-19

- Applicable Rules & Regulations

- Exposure Determination

- Exposure Control Plan

- Establish Workplace Procedures

- Provide Employee Training

- Resources

Overview - Coronavirus

- Coronaviruses are a family of viruses that can cause illness in people. Coronaviruses circulate among animals, including camels, cattle, and cats.

- SARS-CoV-2, the seventh known human coronavirus and the virus that causes COVID-19, is thought to have jumped species from animals to begin infecting humans.

- Other coronaviruses have caused other outbreaks – Severe Acute Respiratory Syndrome (SARS) & Middle East Respiratory Syndrome (MERS)

Illustration: CDC / Alissa Eckert & Dan Higgins
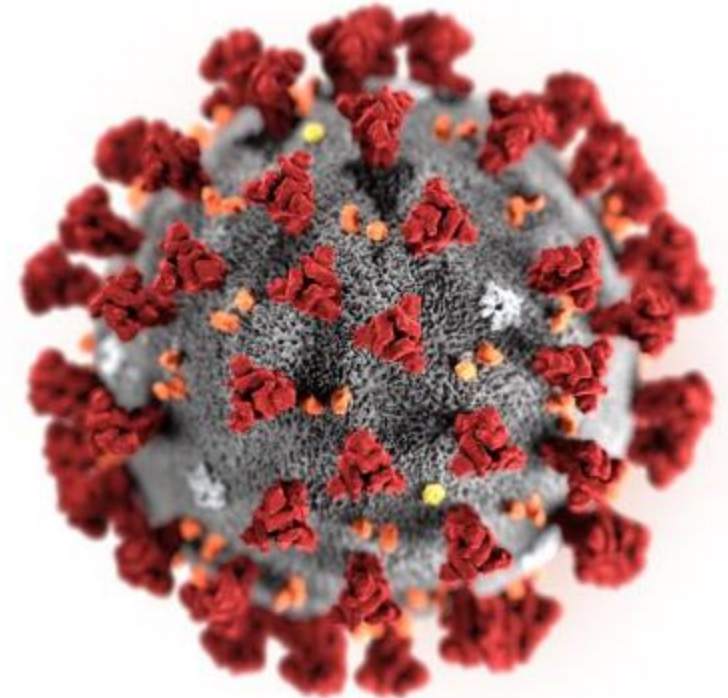
Overview – Signs & Symptoms

- COVID-19 causes mild to severe respiratory illness – can cause a severe pneumonia-like illness

- Typical symptoms
  - Fever (>100.4°F)
  - Cough
  - Shortness of Breath
  - New loss of taste or smell

- Symptoms begin 2-14 days after exposure

How COVID-19 is Spread?

- Person to Person Spread
  - Exposure to respiratory droplets from someone who is infected
  - People without symptoms are able to spread the virus

- Contaminated Surfaces and then touching eyes, nose or mouth

CDC - COVID19

Applicable Rules & Regulations

Existing MIOSHA Standards

- Follow existing MIOSHA standards to help protect workers from exposure to SARS-CoV-2 and infection with COVID-19.

- MIOSHA Enforcement Guidance - COVID19 Interim Enforcement Plan

Relevant MIOSHA Standards

- Personal Protective Equipment Part 33 (OSHA 1910 Subpart I)

- Hazard Communication Part 430 (OSHA 1910.1200)

- Respiratory Protection Part 451 (OSHA 1910.134)

- Recordkeeping Part 11 (29 CFR 1904)

- Sanitation Part 474 (OSHA 1910.141)

- General Duty MIOSHA Act 154 Section 11(a) (OSHAct Sec 5(a)(1))

Exposure Determination

Exposure Determination

- Very High Risk
  - High potential exposure to known or suspected sources of COVID-19
  - Healthcare, laboratory, morgue employees during specific procedures

- High Risk
  - High potential exposure to known or suspected sources of COVID-19
  - Could include - licensed health care professionals, medical first responders, nursing home employees, law enforcement, correctional officers, or mortuary workers

- Medium Risk
  - Jobs that require frequent and/or close contact (within 6 ft) with people who may be infected, but are not known or suspected COVID-19 patients
  - In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread SARS-CoV-2 transmission.
  - In areas where there is ongoing community transmission, workers in this category may have contact with the general public (for example, schools, high-population-density work environments, high-volume retail settings).

- Lower Risk
  - Jobs that do not require contact with people known or suspected of being infected with coronavirus
  - No frequent close contact (within 6ft) with the general public
  - Minimal contact with co-workers

Occupational Risk Pyramid for COVID-19

Very High
High
Medium
Lower Risk (Caution)
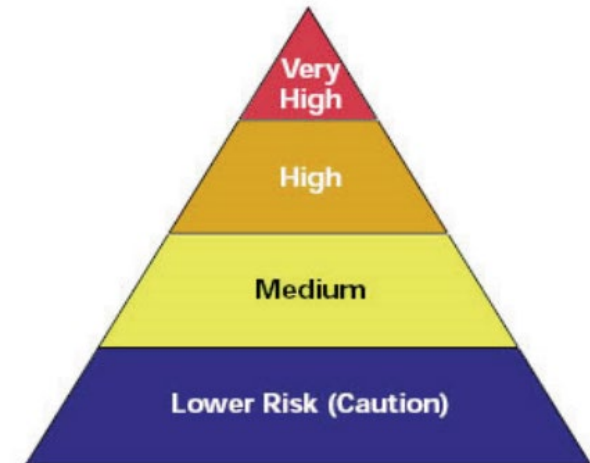
Exposure Determination

Where/How/What sources of Exposure
- General public
- Customers/Visitors
- Co-workers

Assess methods of social distancing
- Staggered work shifts, lunch & breaks
- Downsizing operations
- Teleworking from home
- Cross train on-site workers to perform critical tasks

Assess job tasks with shared equipment & workstations

Assess need for Basic Infection Prevention
- Access to handwashing facilities & hand sanitizer (≥60% alcohol)
- Cleaning & disinfection procedures & materials for workstations

Exposure Control Plan

Exposure Control Plan – Key Elements

An exposure control plan should include:

- Exposure determination

- Detail measures to prevent employee exposure, including any:
  - Engineering controls
  - Administrative controls
  - Hand hygiene and environmental surface disinfection
  - Personal protective equipment
  - Health surveillance
  - Training

- Use current CDC guidance

- Employer shall use preventive measures commensurate to the exposure risk category

Exposure Controls - Engineering Controls

- High-efficiency Air Filters
- Increased Ventilation Rates
- Physical Barriers – Clear plastic barriers, sneeze guard, plexiglass
- Installing a drive-thru window

Most effective

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

Least effective
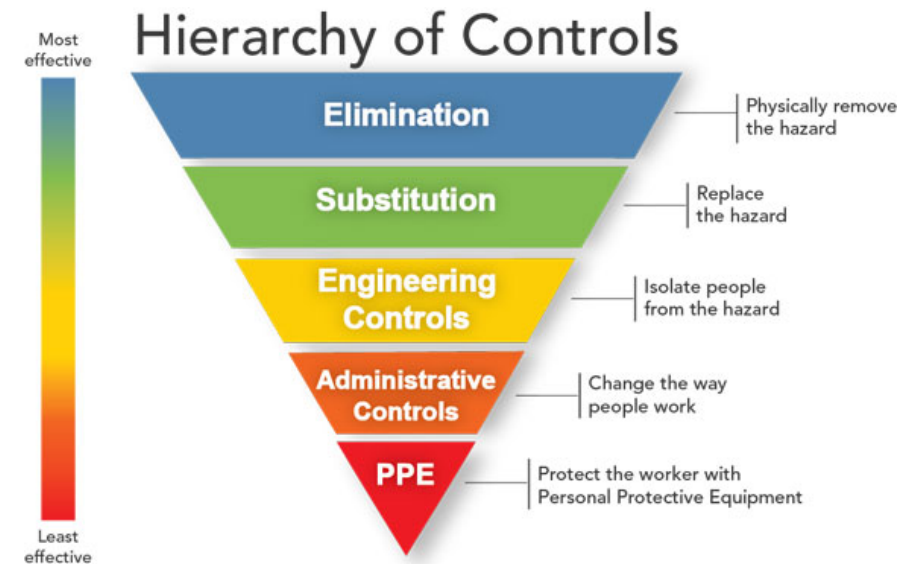
Exposure Controls - Administrative Controls

- Implement flexible work hours & staggered shifts and breaks

- Implement telework, teleconferencing & web conferencing

- Increase the physical space between employees at the worksite

- Move machines & equipment to increase distances between employees

- Practice social distancing & provide visual cues

- Increase the physical space between employees & customers

- Encourage hand hygiene etiquette & use of noncontact methods of greeting

- Require the use of cloth face coverings by employees & customers.

- Post signs related to COVID-19 signs, symptoms & related resources
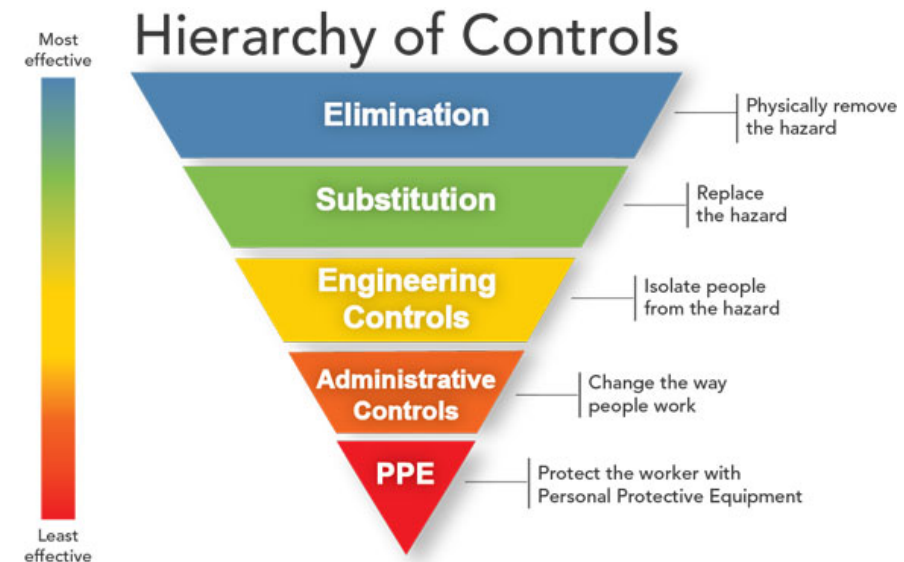
Personal Protective Equipment (PPE)

Very High & High Risk Exposure

- Workers *shall* wear
  - Gloves
  - Gown
  - Face shield or goggles and
  - N95 or higher respiratory protection

Medium Risk Exposure

- Workers *may* need to wear a combination of
  - Gloves
  - Gown
  - Face mask
  - Face shield or goggles
- PPE worn will depend on results of job task hazard assessment
- Masks are *mandatory* when social distancing and physical barriers are not possible
- Employer may make it mandatory for customers to wear a mask in order to enter their facility

Lower Risk Exposure

- No need for additional PPE beyond what is typically used for job tasks
- Masks are voluntary when social distancing is possible

Exposure Controls – Respiratory Protection

- Respiratory Protection – MIOSHA Part 451
  - Required vs Voluntary
    - Sample Written Program
  - OSHA Enforcement Memos

- Selection of Respiratory Protection
  - Respirators other than N95
  - NIOSH Certified vs "Face Masks"
  - Follow CDC guidance for face coverings (respirators vs surgical mask vs cloth/paper coverings)

Face Coverings vs Respirators

	Cloth or Paper Face Mask	Surgical Face Mask	Filtering Facepiece Respirator (e.g. N95)
Testing & Approval	Not tested or approved, but recommended by the CDC	Cleared by the U.S. Food and Drug Administration per 21 CFR 878.4040	Evaluated, tested and approved by NIOSH per 42 CFR Part 84
Intended Use & Purpose	To prevent transmission of the virus between people in close proximity	A fluid resistant barrier designed to protect the wearer from large droplets, splashes or sprays of bodily or other hazardous fluids.	Reduces the wearer's exposure to small particle aerosols and large droplets

The employer determines the necessary PPE required for the job task(s). The employer is responsible for payment, replacement, maintenance, cleaning, laundering and disposal of PPE. Training should be provided to employees regarding proper use, limitations, care and maintenance of PPE. Where respirators are provided, the following table outlines additional requirements:

Guidelines for Employees Using Respiratory Protection

Filtering Facepiece Respirator (e.g. N95)	Required	Voluntary
Fit Testing	Yes	No
Medical Evaluation	Yes	No
Facial Hair Prohibited	Yes	No
Appendix D Provided	No	Yes
Training per 1910.134(k)	Yes	No
Cleaning, Storage & Maintenance of Respirator	Yes	Yes

- Know the difference between cloth face coverings and respirators
- NIOSH Certified Respirators require compliance to the Respiratory Protection Program
- Facemasks vs Respirators Factsheet
- Voluntary vs Required Respirator Use Factsheet

Establish Workplace Procedures

Establish Workplace Procedures

REOPENING AMERICA

GUIDANCE FOR CLEANING & DISINFECTING PUBLIC SPACES, WORKPLACES, BUSINESSES, SCHOOLS, AND HOMES

List of EPA Disinfectants for Coronavirus

Workplace Procedures – Key Elements

- Development of an Infectious Disease Preparedness and Response Plan
  - Develop an Exposure Control Plan
  - Identify Workplace COVID-19 Coordinator
  - Examine & Update Policies
    - Telework
    - Leave
    - Employee Compensation
  - Identify Essential Employees & Business Functions
  - Establish Chain of Communication
  - Train Employees on new procedures and policies

Workplace Procedures – Key Elements

- Facility Re-occupancy Review
  - HVAC and mechanical systems
  - Water systems and cooling towers

American Industrial Hygiene Association (AIHA) – Guidance for Facility Managers

Recovering from COVID-19 Building Closures

Workplace Procedures – Key Elements

- Employee screening procedures - prior to work
  - Temperature, self monitoring symptoms (Cough, fever, shortness of breath)

- Require employees to report symptoms and self-isolate
  - Notify supervisors and stay home
  - Don't allow employees to return until home isolation criteria is met (Follow CDC Guidance)
  - Inform other employees of possible workplace exposure (ADA & HIPAA compliant – keep confidentiality)

- Social Distancing – minimum of 6ft
  - All in-person work must adhere to social distancing practices and measures
  - Provide demarcation lines

- Install physical barriers between customers and/or employees

- Non-medical grade face coverings

Workplace Procedures – Key Elements

- Cleaning Procedures
  - The employer should routinely clean and disinfect all areas such as offices, bathrooms, common areas, and shared electronic equipment
  - If a sick employee is suspected or confirmed to have COVID-19, perform enhanced cleaning and disinfection of all frequently touched surfaces in the workplace
  - Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., required PPE, concentration, application method and contact time).
  - Evaluate procedures to ensure no new hazards are created (e.g. dermatitis from new disinfectant)

Workplace Procedures – Cleaning & Disinfecting

- **Cleaning**
  - Refers to the removal of germs, dirt, and impurities from surfaces. It does not kill germs, but removes them
  - Use soap and water

- **Disinfecting**
  - Refers to using chemicals to kill germs on surfaces. This process does not necessarily clean dirty surfaces or remove germs, but kills germs on a surface *after* cleaning

- **Common Disinfectants**
  - Bleach Solution - ⅓ cup bleach per gallon water or 4 teaspoons bleach per quart water
  - 70% alcohol solutions may also be used – wipes or liquid
  - Common Products - not inclusive
    - Windex Disinfectant Cleaner, Comet Disinfecting Bathroom Cleaner, Scrubbing Bubbles Restroom Cleaner II, Lysol Bathroom Cleaner

Workplace Procedures – Sick Employees

- Employer reporting procedures
  - Require employees to report when they are sick or experiencing symptoms of COVID-19
  - Notify within 24 hours
    - The local health department AND
    - Any co-workers, contractors, or suppliers who may have come into contact with the person with a confirmed case of COVID-19

- Recording COVID-19 Illnesses on MIOSHA 300 Log
  - COVID-19 is a recordable illness and must be recorded by employer if
    1. The COVID-19 case is confirmed as defined by CDC
    2. Work-related as defined by MIOSHA
    3. Involves one or more of the general recording criteria
  - Revised May 19, 2020 - OSHA Enforcement Memo for Recoding COVID-19 Cases

Workplace Procedures – Sick Employees

Returning to Work After COVID-19 Guidelines (Non-healthcare settings)

◦ At least 3 days (72 hours) without fever (without use of fever-reducing medications)

AND

◦ Improvement in Respiratory Symptoms (cough/shortness of breath)

AND

◦ At least 10 days have passed since symptoms first appeared

◦ Current CDC Guidelines for Discontinuation of Isolation

Provide Employee Training

Employee Training – Hygiene Etiquette

- Avoid touching eyes, nose, or mouth with unwashed hands

- Handwashing
  - Use soap and water
  - Wash for 20 seconds
  - Scrub all hand surfaces – between fingers, backs of hand, fingernails

- Hand Sanitizer
  - Use when soap and water are unavailable
  - Sanitizer should be ≥60% alcohol

- Coughing & Sneezing
  - Cover your mouth and nose with tissue
  - If you don't have a tissue use your upper sleeve NOT YOUR HANDS
  - Remember to wash your hands after
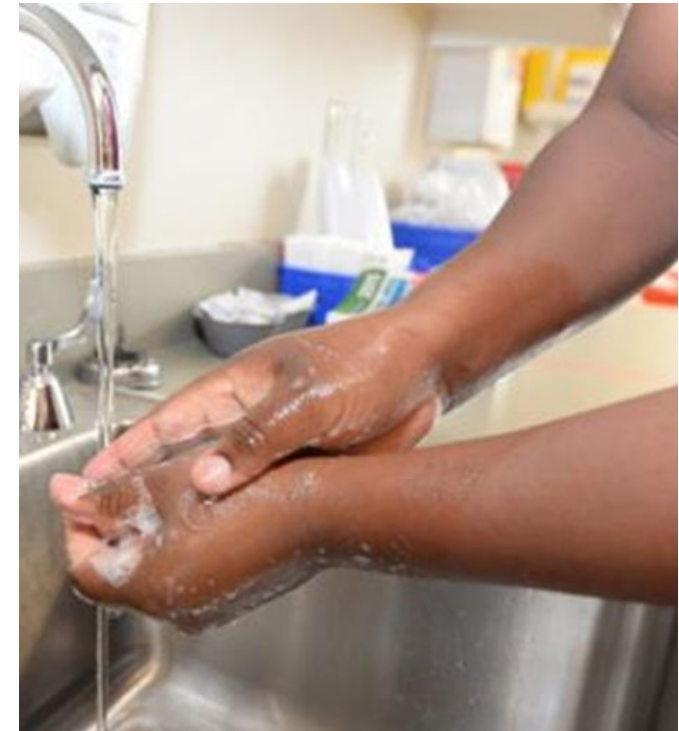
Photo: U.S. Department of Defense

Employee Training – Hygiene Posters

CDC HANDWASHING POSTERS

CDC INFORMATION ON COUGHING & SNEEZING

Employee Training

SARS-CoV-2 and COVID-19 training should include:

- Routes by which SARS-CoV-2 is transmitted from person to person

- Distance that SARS-CoV-2 can travel in the air

- How long SARS-CoV-2 remains viable in the air and on environmental surfaces

- Signs and symptoms of COVID-19

- Steps the employee must take to notify the employer of signs and symptoms of COVID-19 or suspected or confirmed diagnosis of COVID-19

- Measures the employer is implementing to prevent employee exposure to SARS-CoV-2 as described in the employer's exposure control plan

- Steps the employee must take to prevent their exposure to SARS-CoV-2

Employee Training

- Train new policies and procedures
  - Screening Procedures
  - Telework Duties
  - Employee Sick Policy
  - Employee Leave Policy

- New Controls
  - Barriers, Drive-Thru/Pick-up Policies,
  - Cleaning of workspace
  - PPE Requirements
  - Training on new disinfectant chemicals
  - Changes in shift schedules

MIOSHA Resources

MIOSHA Webpage

MIOSHA Consultation, Education & Training (CET) Division

MIOSHA Standards

Request for Consultative Assistance

PPE Guide for General Industry (SP #16)

Respiratory Protection Program – Sample Written Program (SP #05)

Hazard Communication Program – Sample Written Program (CET 5530)

MIOSHA Training Program

COVID-19 Resources

MIOSHA Enforcement Guidance - [COVID19 Interim Enforcement Plan](#)

State of Michigan – [Coronavirus](#) & [Frequently Asked Questions](#)

OSHA – [COVID-19 Information](#)

OSHA Publication - [Guidance on Preparing Workplaces for COVID-19](#)

CDC – [Coronavirus Disease (COVID-19)](#)

CDC – [Interim Guidance for Businesses to Plan and Respond to COVID-19](#)

CDC – [Interim Guidance for Conserving and Extending Respirator Supply (non-healthcare)](#)

CDC – [Use of Cloth Face Coverings to Slow the Spread of COVID-19](#)

Contact MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)

530 W. Allegan Street, P.O. Box 30643

Lansing, Michigan 48909-8143

If you need further information, call 855-SAFEC19 (855-723-3219).

To request consultation, education and training services, call 517-284-7720

or visit our website at:

www.michigan.gov/miosha

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