Occupational Safety and Health Administration
Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace
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Introduction

In response to President Biden’s Executive Order addressing COVID-19 in the workplace, the Occupational Safety and Health Administration, issued new guidance on January 29, 2021 to employers for mitigating hazards associated with COVID-19 exposures in the workplace. Key to OSHA’s guidance document is the requirement that employers implement COVID-19 Prevention Programs.

Under the guidance, all employers regardless of size and risk of exposure are required to implement a COVID-19 Prevention Program which includes conducting a hazard assessment, identification of measures that will limit the spread of COVID-19 in the workplace, adopting measures to ensure that workers that are infected or potentially infected are separated and sent home from the workplace, and implementing protections from retaliation for workers who raise COVID-19 related concerns.

All of current OSHA standards that apply to protecting workers from infection remain in place. These standards include, but are not limited to, requirements for personal protective equipment, respiratory protection, protection from bloodborne pathogens, training under the Hazard Communication Standard for any new chemical risks introduced into the workplace, injury and illness recordkeeping and reporting, and OSHA’s requirements for employee access to medical and exposure records. There is no OSHA standard specific to COVID-19; however, employers still are required under the General Duty Clause of the OSH Act, to provide a safe and healthful workplace that is free from recognized hazards that can cause serious physical harm or death.

The following Frequently Asked Questions (FAQ) answers basic questions and outlines employer responsibilities under the guidance. The guidance contains more detailed information that what is presented in this document.

PRINTING United Alliance has developed a comprehensive COVID-19 Preparedness and Response Plan to help facilities navigate development of policies and procedures addressing workplace exposures to COVID-19. This can be used as the basis for most of the requirements in the new OSHA guidance document.

What are the elements of the COVID-19 Prevention Program?

While the document issued is referenced as a guidance document, it is clear that OSHA expects employers to implement a COVID-19 Prevention Program. The following elements need to be included and will be discussed in detail in the remainder of this FAQ:

1. Assignment of a workplace coordinator who will be responsible for COVID-19 issues on behalf of the employer.
2. Conducting a hazard assessment of the workplace to determine how and where workers might be exposed to COVID-19 at work.
3. Based on OSHA’s hierarchy of controls, identification of measures that will limit the spread of COVID-19 in the workplace. This will include a combination of eliminating the hazard, engineering controls, administrative policies and use of personal protective equipment.
4. Consideration and possible adoption of protections for workers at higher risk for severe illness through policies and practices.
5. Establishment of an effective communication system to workers in a language easily understood.
6. Education and training of employees on COVID-19 policies and procedures in both a format and language easily understood.

7. Development and implementation of policies regarding infected or potentially infected workers regarding stay-at-home practices. This includes adoption of policies regarding telework, use of sick leave and procedure for isolating workers who show symptoms at work.

8. Development and implementation of enhanced cleaning and disinfection policies and procedures.

9. Screening of employees for infection and testing policies and procedures.


11. Anti-retaliation policies and procedures.

12. Providing COVID-19 vaccination information and making the vaccine available to all employees, at no cost.

13. Identification and compliance with all applicable OSHA regulations.

Step One: Conduct a Hazard Assessment.

All employers regardless of size and risk of exposure are required to perform a risk assessment for each employee to assess and categorize their exposure risk level (i.e., “very high,” “high,” “medium,” or “lower”). The specific actions that an employer needs to implement is based on the outcome of the hazard assessment. While federal OSHA has not issued a regulation, some states are mandating it and it is strongly recommended that all employers conduct a hazard assessment on all employees.

OSHA has not provided any template or document to use for the hazard assessment. However, PRINTING United Alliance has developed and encourages the use of the hazard assessment document that can be found here. To determine the actions that need to be taken by your facility for employee protection, the first step is to conduct and certify your hazard assessment. This assessment will document your employees’ risk levels based on a series of questions and exposure scenarios.

What is an Exposure Risk Level?

The standard defines the potential exposure risk of the four categories as follows.

- A “Very High Exposure Risk” has been defined as: jobs with a very high potential for exposure to known or suspected sources of SARS-CoV-2 during specific medical, postmortem, or laboratory procedures.

- A “High” risk of exposure is where the place of employment or task has high potential for employee exposure. OSHA includes those employees who have frequent or sustained contact with coworkers, including under close working conditions indoors or in poorly ventilated spaces in various types of industrial, manufacturing, agriculture, construction, and other critical infrastructure workplaces.

- A “Medium” risk of exposure includes those jobs that require either frequent close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) or sustained close contact with other people in areas with community transmission. In this category, OSHA includes
workers who have frequent or sustained contact with coworkers, including under close working conditions outdoors or in well ventilated spaces in various types of industrial, manufacturing, agriculture, construction, and other critical infrastructure workplaces.

- A “Lower” risk of exposure are those jobs that do not require close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) with other people. Workers in this category have minimal occupational contact with the public and other coworkers. Examples include:
  - Remote workers (i.e., those working from home during the pandemic).
  - Office workers who do not have frequent close contact with coworkers, customers, or the public.

Based on this hierarchy of exposure risks, almost all employees in a printing operation would be classified as either Medium or High Exposure risks.

Step Two: Implement Controls to Limit COVID-19 Risks in the Facility

Once the hazard assessment has been conducted and the employer has determined the exposure risk level for all employees (Note: Not all employees will be the same exposure risk level. You will need to conduct the hazard assessment by job type, etc.) The next step is to implement controls that will limit the spread of COVID-19 in the workplace. How do employers eliminate the hazard by separating and sending home infected or potentially infected people from the workplace?

One key element involves eliminating the hazard, which means isolating workers who are infected or potentially infected so they cannot infect other workers. Employers have the option of following a symptom-based strategy for identifying and separating and sending home workers. However, there are certain circumstances where employers may consider a COVID-19 test-based strategy based on CDC guidelines.

OSHA recommends that workers who have or likely have COVID-19 should be isolated until they meet CDC guidelines for exiting isolation.

OSHA recommends that workers, if they have been exposed to COVID-19, should quarantine. Exposure to COVID-19 has been defined to mean:

- They were within 6 feet of someone who has COVID-19 for a total of 15 minutes or more within a 24-hour period, starting from 2 days before illness onset or, for asymptomatic patients, 2 days prior to test specimen collection until the time the patient is isolated, or

- They provided care at home to someone who is sick with COVID-19, or

- They had direct physical contact with a person who has COVID-19 (e.g., hugged or kissed them), or

- They shared eating or drinking utensils with a person who has COVID-19, or

- Someone who has COVID-19 sneezed, coughed, or somehow got respiratory droplets on them.
What are OSHA’s physical distancing recommendations?

OSHA states in its guidance that the best way to protect individuals is to stay far enough away so as to not breathe in particles produced by an infected person, generally accepted as a distance of at least 6 feet. OSHA recommend that employers limit the number of people in one place at any given time, or seek to increase physical space between workers, where practicable, to at least 6 feet, and take measures to reduce close contact.

How does OSHA’s guidance address the use of face coverings?

OSHA’s guidance indicates that employers should provide all workers face coverings unless their work task requires a respirator. These coverings are to be provided at no cost to the employee. Face coverings should be made of at least two layers of a tightly woven breathable fabric, such as cotton, and should not have exhalation valves or vents. They should fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face.

The requirement to wear a face covering applies to any other individuals at the workplace (e.g., visitors, customers, non-employees) unless they are under the age of 2 or are actively consuming food or beverages on site. Further, wearing a face covering does not eliminate the need for adhering to physical distancing requirements.

When the face covering worn by workers becomes wet and soiled, employers should provide workers with replacements daily or more frequently. Face shields may be provided for use with face coverings to protect them from getting wet and soiled, but they do not provide protection by themselves.

Employers must discuss the possibility of "reasonable accommodation" for any workers who are unable to wear or have difficulty wearing certain types of face coverings due to a serious medical condition.

When deaf employees are present in the workplace, employers are directed to consider acquiring masks with clear coverings over the mouth to facilitate lip reading.

Does OSHA’s guidance address ventilation practices?

Employers need to ensure that all ventilation systems are operating properly and provide acceptable indoor air quality for the current occupancy level in each space, and if possible, increase ventilation rates.

One specific OSHA recommendation is that when weather conditions allow, increase fresh outdoor air by opening windows and doors. It is not advisable to open windows and doors if doing so poses a safety or health risk (e.g., risk of falling, triggering asthma symptoms) to occupants in the building.

Fans can be used to increase the effectiveness of open windows. To safely achieve this, fan placement is important. Avoid placing fans in a way that could potentially cause contaminated air to flow directly from one person over another. One helpful strategy is to use a window fan, placed safely and securely in a window, to exhaust room air to the outdoors. This will help draw fresh air into the room via other open windows and doors without generating strong room air currents.

Also check filters to ensure service life and proper installation. OSHA recommends using the highest compatible filter and seal the edges to limit bypass.
What Personal Protective Equipment requirements are required?

OSHA standards require that employers provide personal protective equipment to supplement other controls if the measures discussed above either cannot be implemented or do not fully protect the employee, based on the COVID-19 hazard assessment. To determine appropriate PPE, employers need to conduct a separate workplace PPE hazard assessment as required by regulation. All employers are to provide the required PPE, including respirators, face shields, protective gowns, and gloves, at no cost to the employee and the proper training on how to use the PPE.

What are the Sanitation Protocols?

OSHA’s guidance document covers several areas—good hygiene practices, routine cleaning and disinfection and enhanced cleaning and disinfection of areas where employees worked that became infected. The guidance requires employers to ensure that employees have the necessary supplies that encourage good hygiene practices.

OSHA’s guidance also requires employers to adopt programs for routine cleaning and disinfecting of the workplace. PRINTING United Alliance has developed a sanitation protocol. This protocol can be found in the Association’s COVID-19 Preparedness and Response Plan. Employers need to ensure that high touch areas are routinely cleaned with proper disinfectants. It is also necessary to ensure that employees are using the appropriate personal protective equipment when using the cleaning products.

Do I need to consider “at risk populations”?

OSHA’s guidance specifically speaks to those populations of older adults as well as those of any age who may have severe underlying medical conditions. Workers may be legally entitled to reasonable accommodations that protect them from the risk of contracting COVID-19. Where feasible, employers should consider reasonable modifications for those employees identified as high risk who can perform their duties through telework, in less densely occupied workspace, or better ventilated alternative facilities or offices.

What Employee Training Requirements Are Required for All Facilities, Regardless of Risk Level?

A training program for all employees, in a language they understand, must be developed that educates them on the characteristics and methods of transmission, ability of pre-symptomatic and asymptomatic COVID-19 persons to transmit the virus, how to prevent exposure to COVID-19, safe and healthy work practices and control measures, including but not limited to, physical distancing, sanitation and disinfection practices, and the anti-discrimination provisions of this guidance.

What Do Facilities Need to do When an Employee Becomes Infected?

Any employee who has or is suspected to have COVID-19 based on exposure, a positive test, or in lieu of a test, COVID-19 symptoms, needs to be told to stay home and not come into the work facility or visit a customer’s facility until cleared. Employees in this category may telework from isolation if possible. Workers who appear to have symptoms upon arriving at work or who develop symptoms while at work, should immediately be separated and sent home.
In the areas where known or suspected to be infected employees or other persons accessed or worked, the company must clean and disinfect prior to allowing other employees access to the areas. Where feasible, a period of 24 hours will be observed prior to cleaning and disinfecting.

**OSHA Guidance and COVID-19 Vaccinations**

OSHA’s guidance document recommends employers make the COVID-19 vaccine or vaccination series available at no cost to all eligible employees. Further, the guidance requires employers to provide information and training on the safety and benefits of vaccinations. Employees that are vaccinated must continue to follow all protective measures established in the workplace. What are the Reporting and Recordkeeping Requirements?

Employers are responsible for recording work related cases of COVID-19 illnesses on their Form 300 logs if the following requirements are met: the employee has a confirmed case of COVID-19; the infection is work related; and the case involves one or more relevant recording criteria, such as medical treatment or days away from work. Employers should report the case to the state health department as required.

**What Anti-Retaliation Protections are in Place?**

OSHA’s regulations currently prohibits discrimination against an employee for reporting a work-related illness. Additionally, the OSH Act prohibits discharging or in any other way discriminating against an employee for engaging in various occupational safety and health activities. For example, employers may not discriminate against employees for raising a reasonable concern about infection control related to COVID-19 to the employer, the employer’s agent, other employees, a government agency, or to the public, such as through print, online, social, or any other media; or against an employee for voluntarily providing and wearing their own personal protective equipment, such as a respirator, face shield, gloves, or surgical mask.

Employers must notify employees of their rights to a safe and healthful work environment, and employers must ensure that workers know whom to contact with questions or concerns about workplace safety and health.

For more information, or if you have questions, please contact PRINTING United Alliance’s Government Affairs Department: Marci Kinter, mkinter@printing.org; Gary Jones at gjones@printing.org; or Adriane Harrison at the Human Resources Department at aharrison@printing.org.