**COVID-19: A Potential OSHA Recordable Illness**

Recently published guidance from OSHA clarifies that workplace-contracted COVID-19 can be a recordable illness. That is, if it was contracted as a result of work duties. OSHA has remained somewhat vague on the details and nuances of this statement, but made sure it was included within its COVID-19 documentation.

Illnesses such as the flu and colds have always been, and continue to be, exempt from recordable illnesses recordkeeping. However, COVID-19 is NOT exempt from being a recordable, even though it contains some of the same symptoms as the flu and cold.

**Have a Plan**

At this time, some workplaces and tasks are considered to have a higher risk employee exposure. Most workplaces will have a low exposure risk. Those in healthcare, deathcare, airline, border protection, solid waste management and wastewater treatment are considered to be in the high risk category. Workers who are required to work within 6 feet of each other would fall in the medium exposure level because the virus is spread through person-to-person droplet contact within that 6-foot range.

As a result, OSHA says it is important for workplaces to take measures to prevent the spread of COVID-19 and have a plan for dealing with it. OSHA’s guidance specifically says there is no standard that covers COVID-19, but it would fall under the General Duty Clause that requires employers to provide workers with “…a place of employment which is free from recognized hazards that are causing or likely to cause death or serious physical harm.” They also mention the PPE standards (1910 Subpart I) which covers usage of gloves, eye protection, face protection and respirators and the Bloodborne Pathogens standard (29 CFR 1910.1030) which covers exposures to body fluids and blood.

OSHA has a dedicated [webpage](https://www.osha.gov/SLTC/covid-19/index.html) covering COVID-19 and they have published [a guidance document](https://www.osha.gov/Publications/OSHA3990.pdf) in conjunction with the Department of Health and Human Services. Both of these address measures on how to protect workplaces and workers at low, medium and high exposure risks and those who work in the specifically targeted high risk industries above.

**Respirator Usage**

Depending on work tasks and potential exposures, workers may need to wear masks, goggles, face shields, and/or respirators. In the guidance document, OSHA says that workers, including those who work within 6 feet of **patients known to be, or suspected of being, infected** and **those performing aerosol-generating procedures**, need to use filtering facepiece or better respirators. Remember that if your workers are wearing respirators, you must have a comprehensive respiratory protection program that has its own complete set of requirements. You can find the respirator standards at 1910.134.

**Hierarchy of Controls**

OSHA’s guide contains ideas for identifying and isolating sick people, where appropriate.OSHA also draws on the Hierarchy of Controls, just as it does for all other safety concerns. For example:

**Engineering Controls**

* High-efficiency air filters
* Increased ventilation rates
* Negative pressure ventilation in areas where aerosols are generated

**Administrative Controls**

* Encouraging sick workers to stay home
* Virtual or teleconferenced meetings rather than face-to-face
* Alternating days or extra shifts to reduce the number of employees in the building, increasing work distances
* Discontinuing non-essential travel
* Emergency communication plans
* Worker training

**Safe Work Practices**

* Promote personal hygiene with tissues, no-touch trash cans, hand soap, alcohol rubs and wipes, disinfectants and disposable towels
* Required regular hand washing or alcohol hand rubs, especially after removing PPE
* Post handwashing signs in restrooms

**PPE**

* Select based on hazard to the worker
* Ensure proper fit and refit
* Consistent and proper wear
* Regular inspections
* Regular cleaning, maintenance and repair
* Proper storage and disposal

OSHA says PPE recommendations are likely to change depending on location, current PPE effectiveness and the nature of the job, so check in with OSHA and the CDC website for updates on recommended PPE.

**Links to OSHA’s Documents and Site**

Below are links to resources for COVID-19 planning and information:

[OSHA and DHHS Guidance on Preparing Workplaces for COVID-19](https://www.osha.gov/Publications/OSHA3990.pdf)

[OSHA COVID-19 Website](https://www.osha.gov/SLTC/covid-19/index.html)

[CDC COVID-19 Website](https://www.cdc.gov/coronavirus/2019-ncov/index.html)

[EPA’s List of Registered Antimicrobial Products for Use Against Novel Coronavirus SARS-CoV-2, the Cause of COVID-19](https://www.epa.gov/sites/production/files/2020-03/documents/sars-cov-2-list_03-03-2020.pdf)