# blr COVID-19 Checklist
Best Practices for Employers

This checklist will allow you to quickly evaluate whether your organization is taking appropriate actions, in accordance with Occupational Safety and Health Administration (OSHA) guidance, to protect unvaccinated workers, otherwise at-risk employees, and workers located in areas of substantial or high community transmission from COVID-19 within your workplace. This checklist applies to workplaces other than healthcare settings,which must comply with OSHA's emergency temporary standard under 29 Code of Federal Regulations (CFR) 1910.502.
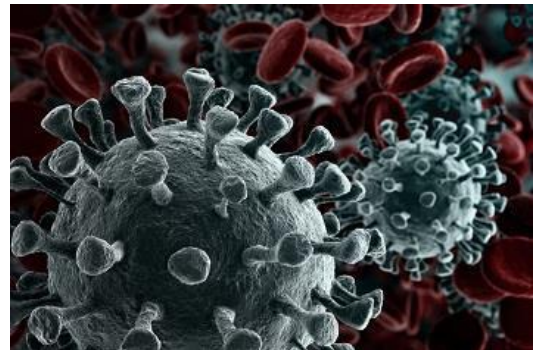
Per OSHA, employers and workers who are located in areas of substantial or high community transmission should take appropriate steps to prevent exposure and infection regardless of vaccination status. In addition, all employers are required under OSHA'sGeneral Duty Clause to provide a safe and healthful workplace free from recognized hazards that are causing or likely to cause death or serious physical harm, including COVID-19.

General Employee Safety and Well-Being

☐ Stay up to date on guidance from federal, state, and local health officials. Communicate accurate and up-to-date information to your employees about the transmission and symptoms of the illness, or direct employees to appropriate resources from federal, state, and local health officials.

☐ Stay up to date on vaccination opportunities, and communicate this information to employees, along with information about paid leave, if necessary, to get vaccinated and recover from any side effects.

☐ Provide paid time off for employees who decide to receive the vaccine and to recover from any potential side effects from the vaccine. Communicate this information to employees.

☐ Consider adopting policies that require workers to get vaccinated or to undergo regular COVID-19 testing.

☐ Engage with workers and their representatives to determine how to implement interventions to protect unvaccinated or otherwise at-risk workers and mitigate the spread of COVID-19.

☐ Instruct any of the following to stay home from work to prevent or reduce the risk of transmission of COVID-19:

- Workers who are infected,
- Unvaccinated workers who have had close contact with someone who tested positive for COVID-19, *and*
- All workers with COVID-19 symptoms.

☐ Post a notice suggesting or requiring that unvaccinated customers, visitors, or guests wear face coverings, especially ifthere are unvaccinated or otherwise at-risk workers in the workplace who are likely to interact with thesecustomers, visitors, or guests.

Physical Distancing

Implement physical distancing for unvaccinated and otherwise at-risk employees. Physicaldistancing may include:

☐ Reorganizing the workspace to generally keep at least 6 feet of distance between unvaccinated or otherwise at-risk workers and other unvaccinated or otherwise at-risk people;

☐ Limiting the number of unvaccinated or otherwise at-risk workers in one place at any given time by:

    ☐ Implementing flexible worksites (i.e., allowing remote work);

    ☐ Implementing flexible work hours (e.g., rotating or staggering shifts to limit the number of unvaccinated and otherwise at-risk employees in the workplace at the same time); *and*

    ☐ Delivering services to customers remotely (e.g., phone, video, or Web).

☐ Installing transparent shields or other solid barriers at fixed workstations where unvaccinated or otherwise at-risk workers are not able to remain at least 6 feet away from other people:

    ☐ Barriers block face-to-face pathways between individuals to prevent direct transmission of respiratory droplets.

    ☐ Openings are placed at the bottom and made as small as possible.

    ☐ The posture (sitting or standing) of users was considered when designing and installing barriers.

    ☐ The need for enhanced ventilation was considered when designing and installing barriers.

Face Coverings or Surgical Masks

☐ Consider requiring unvaccinated and otherwise at-risk employees to wear face coverings or surgical masks.

☐ Consider requiring fully vaccinated people wear face coverings or surgical masks in public indoor settings in areas of substantial or high transmission.

☐ Support all workers who choose to continue wearing face coverings, regardless of vaccination status, unless there is a safety concern (e.g., straps getting caught in machinery).

☐ If employees are in a setting where face coverings may increase the risk of heat-related illness or cause safety concerns, consider consulting with an occupational safety and health professional to help determine the appropriate face covering/respirator use for their setting.

☐ Consider allowing workers to opt not to wear face coverings outdoors, unless they are otherwise at risk or it is prohibited by federal, state, or local requirements.

Maintain face covering or mask policies that include:

☐ Providing workers with face coverings or surgical masks, unless their work task requires a respirator or other personal protective equipment (PPE), that:

    ☐ Are made of at least two layers of a tightly woven, breathable fabric, such ascotton, and do not have exhalation valves or vents.

    ☐ Fit properly—snugly over the nose, mouth, and chin, with no large gaps onthe outside of the face.

    ☐ Are of no cost to employees.

    ☐ May be replaced daily or more frequently for operations where the face covering may become wet and soiled, or face shields are provided and used in addition to face coverings to prevent face coverings from become wet and soiled.

    ☐ Haveclear coverings over the mouth to facilitate lip-reading if there are employees who are deaf or hard of hearing in the workplace.

☐ Ensuring employees wear face coverings properly, covering the nose andmouth; *and*

☐ Providing reasonable accommodation for any workers who are unable to wear or have difficulty wearing certain types of face coverings due to a disability or religious beliefs.

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Personal Protective Equipment (PPE)

When an employer determines that PPE is necessary to protect workers, the employer must:
- ☐ Provide appropriate PPE in accordance with relevant mandatory OSHA standards.
- ☐ Ensure PPE is used properly.
- ☐ Provide appropriate respirators, if necessary and according to 29 CFR 1910.134.
- ☐ Ensure respirators are used properly, according to 29 CFR 1910.134, including voluntary use when workers supply their own respirators.

- ☐ Proactively inform employees who have a legal right to PPE as a reasonable accommodation for their disability about how to make such a request.

- ☐ Encourage and support voluntary use of PPE for employees who are still concerned about their personal safety or that of a family member/close contact who is at high risk of severe illness from COVID-19, and ensure the equipment is adequate to protect the workers.

Cleaning and Disinfecting

When no people with confirmed or suspected COVID-19 are known to have been in the workspace:
- ☐ Develop a plan that includes what needs to be cleaned based on the type of surface and how frequently it is touched.
- ☐ Clean high-touch surfaces once per day.
- ☐ Ensure cleaning staff are trained on proper use of cleaning products as required by OSHA's Hazard Communication standards.
- ☐ Follow the proper use instructions for all cleaning products.
- ☐ Use PPE appropriate for the job.
- ☐ Wash hands with soap and water for 20 seconds after cleaning and immediately after wearing gloves.

If there has been a sick person or someone who tested positive for COVID-19 in your facility within the last 24 hours, clean and disinfect the space, including:
- ☐ Closing off areas used by the person who is sick, and do not use those areas until after cleaning and disinfecting is complete.
- ☐ Waiting at least several hours before you clean and disinfect.
- ☐ Opening doors and windows, and use fans or heating, ventilation, and air conditioning (HVAC) settings to increase air circulation in the area.
- ☐ Ensuring cleaning staff are trained on proper use and storage of cleaning products as required by OSHA's Hazard Communication standards.
- ☐ Following the proper use instructions for all cleaning products.
- ☐ Only using products that are Environmental Protection Agency (EPA)-approved disinfectants.
- ☐ Using PPE appropriate for the job.
- ☐ If needed, vacuuming the space using a high-efficiency particulate air (HEPA) filter and bags.

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Training and Communication

Continue to inform, educate, and train employees about COVID-19 and the company's COVID-19 policies and procedures, including:

☐ Providing information and training in accessible formats and in languages that employees, including those with disabilities, understand;

☐ Providing training to employees, contractors, and any other individuals on the worksite, as appropriate;

☐ Providing training that covers:

    ☐ Basic facts about COVID-19 and how it is spread;

    ☐ The importance of physical distancing;

    ☐ The importance of ventilation;

    ☐ The importance of vaccination;

    ☐ The importance of using face coverings;

    ☐ The importance of hand hygiene;

    ☐ Workplace policies and procedures implemented to protect workers from COVID-19 hazards;

    ☐ The employees' rights to a safe and healthful work environment;

    ☐ Whom to contact with questions or concerns about workplace safety and health;

    ☐ The employees' rights to raise workplace safety and health concerns free from retaliation; *and*

    ☐ OSHA's prohibition of discrimination against an employee for reporting a work-related illness.

☐ Training managers and supervisors on how to implement COVID-19 policies;

☐ Training managers and supervisors on workplace flexibilities and other Human Resources policies and procedures;

☐ Tracking which workers have received training and when;

☐ Communicating workplace policies clearly, frequently, and via multiple methods to promote a safe and healthy workplace;

☐ Communicating accurate and up-to-date information to their employees about the transmission and symptoms of the illness or directing employees to appropriate resources from federal, state, and local health officials;

☐ Communicating vaccination opportunity information to employees, along with information about paid leave, if necessary, to get vaccinated and recover from any side effects; *and*

☐ Considering the use of a hotline or another method for workers to voice concerns anonymously.

Engineering Controls

Take necessary actions to ensure ventilation systems are functioning in a manner that will minimize the transmission of COVID-19, including:

☐ Operating HVAC systems in accordance with the manufacturer's instructions and design specifications;

☐ Conducting all regularly scheduled inspections and maintenance procedures;

☐ Maximizing the amount of outside air supplied;

☐ Installing air filters with a Minimum Efficiency Reporting Value (MERV) 13 or higher where feasible;

☐ Maximizing natural ventilation in buildings without HVAC systems by opening windows or doors when conditions allow and provided it is not a safety risk; *and*

☐ Considering the use of portable air cleaners with HEPA filters in spaces with high occupancy or limited ventilation.

Recordkeeping and Reporting

Maintain appropriate records and submit reports as required, including:

☐ Recording work-related cases of COVID-19 illness on OSHA's Form 300 logs, provided the case:
  (1) Is a confirmed case of COVID-19;
  (2) Is work-related, as defined in 29 CFR 1904.5; *and*
  (3) Involves one or more relevant recording criteria, as outlined in 29 CFR 1904.7 (e.g., medical treatment, days away from work).

☐ Reporting COVID-19 fatalities to OSHA according to 29 CFR 1904.

☐ Reporting COVID-19 hospitalizations to OSHA according to 29 CFR 1904.

☐ Reporting COVID-19 outbreaks to health departments, as required, and support their contact tracing efforts.

[OSHA will not enforce 29 CFR 1904's recording requirements to require any employers to record worker side effects from COVID-19 vaccination through May 2022. Individuals may choose to submit adverse reactions to the federal Vaccine Adverse Event Reporting System.]

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