

COVID-19 OSHA Guidance

OSHA standards require formal hazard assessments for work environments where PPE is deemed necessary, where work is performed in confined spaces and for documenting lockout/tagout procedures. Although formal hazard assessments are not required for all job tasks, OSHA has repeatedly issued guidance on the value of Job Hazard Analyses (JHAs) in maintaining a safe and compliant workplace. Relative to COVID-19, there are several potentially applicable OSHA Standards:

- 29 CFR § 1904, Recording and Reporting Occupational Injuries and Illness
- 29 CFR § 1910.132, General Requirements - Personal Protective Equipment
- 29 CFR § 1910.133, Eye and Face Protection
- 29 CFR § 1910.134, Respiratory Protection
- 29 CFR § 1910.141, Sanitation
- 29 CFR § 1910.145, Specification for Accident Prevention Signs and Tags
- 29 CFR § 1910.1020, Access to Employee Exposure and Medical Records
- Section 5(a)(1), General Duty Clause of the OSH Act

One of the best steps employers can take to prevent the spread of COVID-19 in the workplace is the completion of JHAs for job tasks. This will not only help to ensure that every possible action is taken to protect workers, but also would provide a level of documentation should an OSHA inspection occur.

The OSHA General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health Act, requires each employer furnish to each of its employees a workplace that is free from recognized hazards that are causing or likely to cause death or serious physical harm. The General Duty Clause is essentially OSHA's catch all. In absence of a clearly defined standard, OSHA can use it to cite companies for workplace hazards they feel the employer should have identified and remedied. This is likely the standard that OSHA will utilize to cite companies for failing to protect workers from COVID-19.

Every job or process should be fully evaluated to determine the potential of respiratory disease transmission through either modifying existing JHAs or creating ones specific to the prevention of respiratory disease in the workplace. JHAs break jobs down into individual worker task or steps, identifies associated hazards, and methods that can be utilized to eliminate or reduce them. Existing JHAs can be modified to evaluate potential exposure to respiratory disease transmission through the addition of two criteria for each step of a given job. The two criteria are:

- Close proximity to other persons – working within six feet of coworkers or the general public
- Presence of shared surfaces – counter tops, worktables, equipment controls, tools, materials/product in process

Additional OSHA Guidance (Click to view resource)

- [Recordkeeping Guidance](#)
- [Guidance on Preparing Workplaces for COVID-19](#)
- [Interim Enforcement Response Plan for COVID-19](#)