

# HANDOUT FOR Cal/OSHA Compliance Amid COVID-19 Pandemic

Presented by:

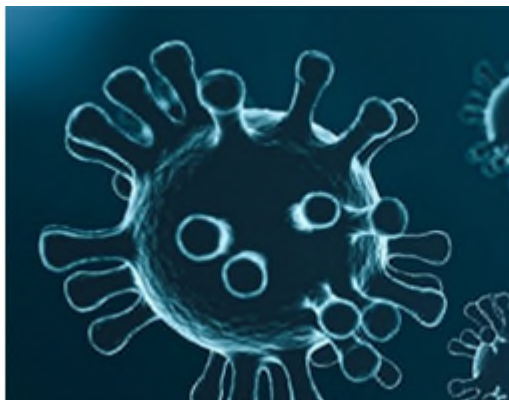
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# Cal/OSHA Guidance on Requirements to Protect Workers from Coronavirus



Workplace safety and health regulations in California require employers to protect workers exposed to airborne infectious diseases such as the coronavirus. Cal/OSHA has posted guidance to help employers comply with these safety requirements and to provide workers information on how to protect themselves.

Cal/OSHA's Aerosol Transmissible Diseases (ATD) standard ([section 5199](#)) requires protection for employees working at health care facilities, and other services and operations, including:

- Hospitals, skilled nursing facilities, clinics, medical offices, outpatient medical facilities, home health care, long-term health care facilities, hospices, medical outreach services, medical transport and emergency medical services
- Certain laboratories, public health services and police services that are reasonably anticipated to expose employees to an aerosol transmissible disease.
- Correctional facilities, homeless shelters, and drug treatment programs
- Any other locations when Cal/OSHA informs employers in writing that they must comply with the ATD Standard

To protect workers and prevent exposure to the virus, employers must develop and maintain the required programs and plans for their facility or operation. Cal/OSHA recommends the interim guidance, educational materials and model programs and plans below be reviewed with an employer's existing procedures to ensure that workers are protected.

## 1. Interim Guidance on Respirator Shortages

- [Cal/OSHA Interim Guidance on COVID-19 for Health Care Facilities: Severe Respirator Supply Shortages \(PDF\)](#)

## 2. Health and Safety Guidance for Childcare Providers

- [Safety & Health Guidance | COVID-19 Infection Prevention in Childcare Programs \(PDF\)](#)

## 3. Interim Guidelines for Protecting Workers in General Industry

- [Cal/OSHA Interim Guidelines for General Industry on 2019 Novel Coronavirus Disease \(COVID-19\)](#)

## 4. Educational Materials and Fact Sheets

- [General Industry Guidance for Protecting Workers from Coronavirus \(COVID-19\) \(PDF\)](#)
- [Health Care Workers Guidance for Protecting Workers from Coronavirus \(COVID-19\) \(PDF\)](#)
- [Safety & Health Fact Sheet | Aerosol Transmissible Diseases \(PDF\)](#)
- [The California Workplace Guide to Aerosol Transmissible Diseases \(PDF\)](#)

## 5. Model Written Plans and Programs

- [Aerosol Transmissible Diseases Model Exposure Control Plan \(Word\)](#)
- [Aerosol Transmissible Diseases Model Laboratory Biosafety Plan \(Word\)](#)
- [Aerosol Transmissible Diseases Referring Employer Model Written Program \(Word\)](#)

## 6. Other Resources

- [FAQs on laws enforced by the California Labor Commissioner's Office](#)
- [CDPH webpage on Coronavirus Disease 2019 \(COVID-19\)](#)
- [CDC webpage on Coronavirus Disease 2019 \(COVID-19\)](#)
- [Federal OSHA webpage on COVID-19](#)

March 2020

<https://www.dir.ca.gov/dosh/coronavirus/Health-Care-General-Industry.html>



## **Cal/OSHA Notice:**

### **Guidance Posted on Requirements to Protect Workers from Coronavirus**

*March 6, 2020*

Cal/OSHA is forwarding this message to provide employers, workers and other safety and health professionals in California with vital information on what is required to protect workers from exposure to airborne infectious diseases such as the coronavirus.

Guidance documents, educational materials and model programs have been posted on Cal/OSHA's website to help employer's comply with the requirements. Cal/OSHA recommends employers review this guidance along with their existing procedures to ensure that their plans are effectively protecting workers.

Our goal at the Department of Industrial Relations and Cal/OSHA is to ensure that you have the information you need to protect your workers during this state of emergency.

Employers with questions can call (800) 963-9424 for assistance from Cal/OSHA Consultation Services. Employees with work-related questions or complaints may contact DIR's Call Center in English or Spanish at 844-LABOR-DIR (844-522-6734).

Thank you.

Resources:

- [Cal/OSHA webpage on Requirements to Protect Workers from Coronavirus](#)
- [Cal/OSHA Interim Guidelines for General Industry on 2019 Novel Coronavirus Disease \(COVID-19\)](#) (PDF attached)



## Cal/OSHA Interim Guidelines for General Industry on 2019 Novel Coronavirus Disease (COVID-19)

**Note: These Interim Guidelines Are Subject to Change as the Situation Evolves**

These guidelines are not for health care employers and employees. For Cal/OSHA interim guidance for health care employers and employees, please see [Interim Guidance for Protecting Health Care Workers from Exposure to 2019 Novel Coronavirus \(2019-nCoV\)](#).

### Background

Cal/OSHA's regulations require protection for workers exposed to airborne infectious diseases such as the 2019 novel coronavirus disease (COVID-19), first identified in Wuhan City, China in December 2019. This interim guidance provides employers and workers with information for preventing exposure to the coronavirus (SARS-CoV-2), the virus that causes COVID-19. Employers and employees should review their own health and safety procedures as well as the recommendations and standards detailed below to ensure workers are protected.

### Employers Covered by the ATD Standard

Cal/OSHA requires employers covered by the Aerosol Transmissible Diseases (ATD) Standard (California Code of Regulations, title 8, [section 5199](#)) to protect employees from airborne infectious diseases such as COVID-19 and pathogens transmitted by aerosols. The ATD Standard applies to:

1. Hospitals, skilled nursing facilities, clinics, medical offices, outpatient medical facilities, home health care, long-term health care facilities, hospices, medical outreach services, medical transport and emergency medical services
2. Certain laboratories, public health services and police services that are reasonably anticipated to expose employees to an aerosol transmissible disease.
3. Correctional facilities, homeless shelters, and drug treatment programs.
4. Any other locations when Cal/OSHA informs employers in writing that they must comply with the ATD Standard.

When covered employers effectively implement the ATD Standard, they also reduce exposure risks for other staff in the workplace who may not have patient contact, and the community as a whole. Employers covered by the ATD Standard should review section 5199 and [Interim Guidance for Protecting Health Care Workers from Exposure to 2019 Novel Coronavirus \(2019-nCoV\)](#) for further information.

### Employers Not Covered by the ATD Standard



Cal/OSHA recommends employers not covered by the ATD Standard follow recommendations from the Centers for Disease Control and Prevention (CDC), [Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\), February 2020](#).

These guidelines include infection prevention measures which include:

- Actively encouraging sick employees to stay home
- Sending employees with acute respiratory illness symptoms home immediately
- Providing information and training to employees on:
  - Cough and sneeze etiquette
  - Hand hygiene
  - Avoiding close contact with sick persons
  - Avoiding touching eyes, nose, and mouth with unwashed hands
  - Avoiding sharing personal items with co-workers (i.e. dishes, cups, utensils, towels)
  - Providing tissues, no-touch disposal trash cans and hand sanitizer for use by employees
- Performing routine environmental cleaning of shared workplace equipment and furniture (disinfection beyond routine cleaning is not recommended)
- Advising employees to check [CDC's Traveler's Health Notices](#) prior to travel

The CDC guidelines also contain recommendations for creating an infectious disease outbreak response plan to be followed in the event of an outbreak. These response plans include one or more of the following:

- Allowing flexible worksites, telecommuting and flexible work hours to increase physical distance among employees
- Using other methods of minimizing exposure between employees, and between employees and the public
- Postponing or canceling large work-related meetings or events

### **Additional Cal/OSHA Regulations for Workplaces Where There is Significant Risk of Exposure**

Although the scope of the ATD Standard is limited to certain employers, there are other Cal/OSHA regulations that apply to all employers. These may be applicable to protect employees from exposure to the coronavirus where there is a significant risk in the workplace.



## Injury and Illness Prevention Program (IIPP)

All employers must have an IIPP (title 8 [section 3203](#)) to protect employees from workplace hazards. Employers are required to determine if COVID-19 infection is a hazard in their workplace. If it is a workplace hazard, then employers must:

- Implement measures to prevent or reduce infection hazards, such as implementing the CDC recommended actions listed above
- Provide training to employees on their COVID-19 infection prevention methods

## Washing Facilities

Regardless of COVID-19 risk, all employers must provide washing facilities that have an adequate supply of suitable cleansing agents, water and single-use towels or blowers (title 8 sections [1527](#), [3366](#), [3457](#) and [8387.4](#)).

## Personal Protective Equipment (PPE)

Title 8 [section 3380](#) Personal Protective Devices requires employers to conduct a hazard assessment to determine if hazards are present in the workplace that necessitate the use of PPE. If an employer identifies COVID-19 as a workplace hazard, they must select and provide exposed employees with properly fitting PPE that will effectively protect employees.

## Control of Harmful Exposures

Title 8 [section 5141](#) Control of Harmful Exposures requires employers to protect employees from inhalation exposures that can result in injury, illness, disease, impairment or loss of function. COVID-19 is a harmful exposure if there is an increased risk of infection at the workplace. Employers must implement engineering controls where feasible and administrative controls where practicable, or provide respiratory protection where engineering and administrative controls cannot protect employees and during emergencies. The CDC recommendations above describe some useful administrative controls. For more information on respirator use see section [5144](#) and the federal OSHA [respiratory protection etool](#). Surgical and other non-respirator face masks do not protect persons from airborne infectious disease and cannot be relied upon for novel pathogens. They do not prevent inhalation of virus particles because they do not seal to the person's face and are not tested to the filtration efficiencies of respirators.

## **Resources**

National Institute for Occupational Safety and Health, Centers for Disease Control and Prevention. [Coronavirus Disease-2019](#)

Centers for Disease Control and Prevention. [Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\), February 2020](#).



Centers for Disease Control and Prevention. [Coronavirus Disease 2019 \(COVID-19\)](#)

Centers for Disease Control and Prevention. [Cough & Sneezing Etiquette](#)

Centers for Disease Control and Prevention. [Cover your Cough](#)

Centers for Disease Control and Prevention. [Healthy Habits to Help Prevent Flu](#)

Centers for Disease Control and Prevention. [Keeping Hands Clean](#)

Centers for Disease Control and Prevention. [FAQ for Travelers](#)

Centers for Disease Control and Prevention. [Travel Health Notices](#)

California Department of Public Health. [Novel Coronavirus 2019 \(COVID-19\)](#)

California Department of Public Health. [Guidance on Hand Hygiene](#)

California Department of Public Health. [Novel Coronavirus Guidance for Child Care and Preschool Settings](#)

California Department of Public Health. [2019 Novel Coronavirus Guidance for Colleges and Universities](#)

California Department of Public Health. [2019 Novel Coronavirus Guidance for Schools and School Districts](#)

Cal/OSHA. Aerosol Transmissible Diseases Standard (title 8 [section 5199](#))

Cal/OSHA. [Aerosol Transmissible Diseases Model Exposure Control Plan](#)

Cal/OSHA. [California Workplace Guide to Aerosol Transmissible Diseases](#)

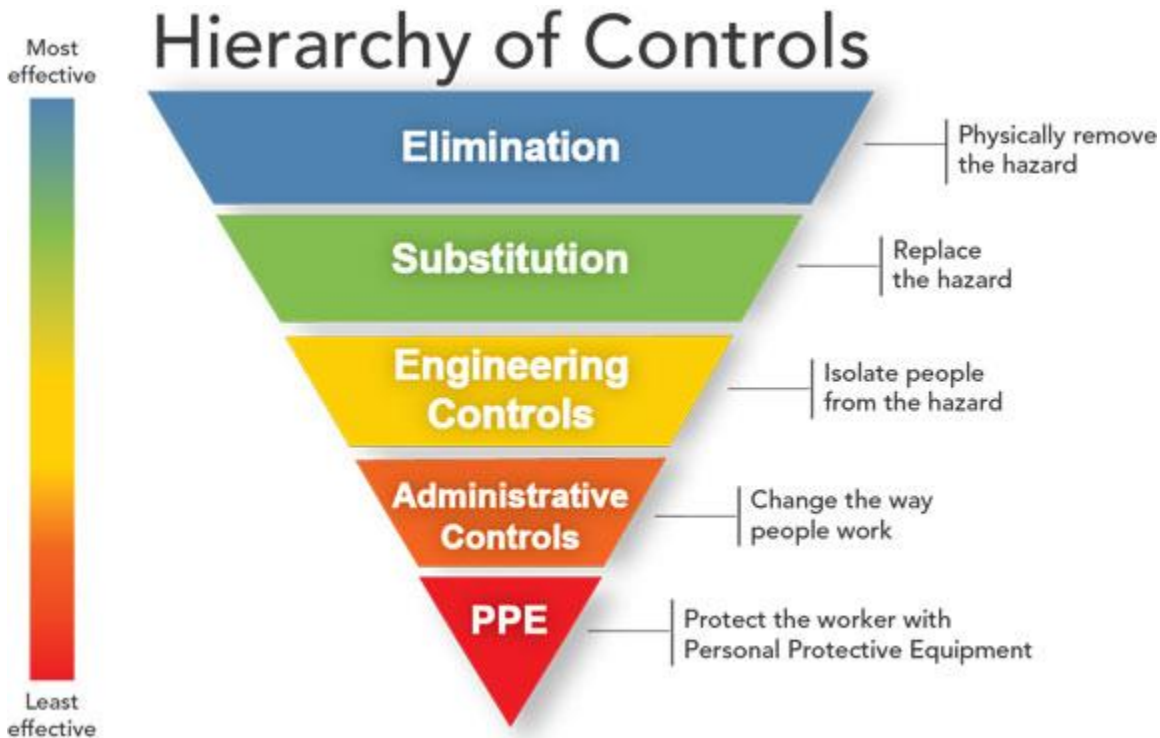


# HIERARCHY OF CONTROLS

## Overview

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions.

One representation of this hierarchy is as follows:



The idea behind this hierarchy is that the control methods at the top of graphic are potentially more effective and protective than those at the bottom. Following this hierarchy normally leads to the implementation of inherently safer systems, where the risk of illness or injury has been substantially reduced.

NIOSH leads a national initiative called [Prevention through Design](#) to prevent or reduce occupational injuries, illnesses, and fatalities through the inclusion of prevention considerations in all designs that impact workers. Hierarchy of controls is a PtD strategy.

## 1. Elimination and Substitution

Elimination and substitution, while most effective at reducing hazards, also tend to be the most difficult to implement in an existing process. If the process is still at the design or development stage, elimination and substitution of hazards may be inexpensive and simple to implement. For an existing process, major changes in equipment and procedures may be required to eliminate or substitute for a hazard.

## 2. Engineering Controls

[Engineering controls](#) are favored over administrative and personal protective equipment (PPE) for controlling existing worker exposures in the workplace because they are designed to remove the hazard at the source, before it comes in contact with the worker. Well-designed engineering controls can be highly effective in protecting workers and will typically be independent of worker interactions to provide this high level of protection. The initial cost of engineering controls can be higher than the cost of administrative controls or PPE, but over the longer term, operating costs are frequently lower, and in some instances, can provide a cost savings in other areas of the process.

For descriptions of engineering control technologies researched by NIOSH, and information on the control details and their effectiveness, visit our [Engineering Controls Database](#). The engineering controls contained in the database are beneficial for users who need control solutions to reduce or eliminate worker exposures.

## 3. Administrative Controls and PPE

Administrative controls and [PPE](#) are frequently used with existing processes where hazards are not particularly well controlled. Administrative controls and PPE programs may be relatively inexpensive to establish but, over the long term, can be very costly to sustain. These methods for protecting workers have also proven to be less effective than other measures, requiring significant effort by the affected workers.