



## **Workplace Measures for Responding to COVID-19 Epidemic Based on OSHA Guidance Memorandum**

- Review your infectious disease control policy, or develop one. Plan should consider and address issues outlined below.
- Appoint a Human Resources (HR) representative, or team of representatives, as a central resource for employees with concerns about COVID-19.
- Prepare and issue a workplace response plan for review by managers so they better understand your legal obligations and company positions.
- Regularly update employees on developing World Health Organization (WHO) and Centers for Disease Control (CDC) guidance about COVID-19 and its signs and symptoms, as well as any public health recommendations issued by applicable federal, state, or local authorities.
- Consider cancelling non-essential meetings and/or company gatherings, particularly those involving international travel. Consider limiting or postponing non-essential business travel to high-risk geographies.
- Remind employees of teleworking resources, if applicable, and sick leave policies and benefits. Consider encouraging teleworking where practicable, particularly in geographies most affected by COVID-19.
- Provide a hygienic working environment (e.g., clean facilities regularly), and promote safe health practices.
  - CDC recommends “routine cleaning,” and, where practical, periodic disinfecting with EPA approved anti-viral disinfectants. Routine cleaning and disinfecting should include, among other things, frequently touched surfaces in the workplace, such as workstations, countertops, and doorknobs.
  - Provide disposable wipes so that commonly used surfaces can be wiped down by employees before each use.
  - Provide tissues and no-touch disposal receptacles for use by employees.
  - Promote frequent and thorough hand washing, including:

- Instructing employees to clean their hands often with an alcohol-based hand sanitizer that contains at least 60-95% alcohol, or wash their hands with soap and water for at least 20 seconds.
- Provide soap and water and alcohol-based hand rubs in the workplace. Ensure that adequate supplies are maintained.
- Place posters in high-visibility areas encouraging employees to stay at home when sick, to use proper cough and sneeze etiquette (covering coughs and sneezes with tissue or if tissues are unavailable, elbows or shoulders, avoiding hands), and to use proper hand hygiene.
- Instruct employees to clean their hands often with an alcohol-based hand sanitizer.
- Discourage sharing of other workers' phones, desks, offices, and other tools or equipment where possible.

Develop Policies and Procedures for Prompt Identification and Isolation of Sick Employees, including:

- Monitoring of employees for signs and symptoms of COVID-19 exposure, including fevers, flu-like symptoms, and difficulty breathing.
- Encourage sick employees to stay home and immediately contact an HR representative if he or she is experiencing symptoms of COVID-19. (U.S. employers generally have the right to instruct visibly ill employees to stay away from the workplace, to prevent the spread of illness.)
- Do not require submission of a healthcare providers' note to validate COVID-19 symptoms.
- Development of procedures for isolating and removing sick employees from the workplace.
- Ensure that your sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies.

- CDC recommends that employees who appear to have acute respiratory illness symptoms (*i.e.*, cough, shortness of breath) upon arrival to work, or become sick during the day, should be separated from other employees and be sent home immediately. Sick employees should cover their noses and mouths with a tissue when coughing or sneezing (or an elbow or shoulder if no tissue is available).
  
- If an employee is confirmed to have COVID-19, you should inform relevant co-employees of possible exposure to COVID-19 but maintain confidentiality as required by the Americans with Disabilities Act (ADA), 42 U.S.C. § 12112(d)(3)(B); §12112(d)(4)(C). In addition, you should:
  - Close off the area used by the sick employee, and clean it.
  - Notify the local health department.
  - The decision as to whether to allow employees exposed to the sick person to continue working is a complex, fact-specific decision. According to CDC, if an employee is permitted to work after an exposure, he or she “should self-monitor under the supervision of [the] employer’s occupational health program including taking [his or her] temperature before each work shift to ensure [he or she] remain[s] afebrile.”
  - Exposed employees who present any of the following symptoms should leave work and seek immediate medical attention:
    - Skin rash;
    - Difficulty breathing;
    - Persistent cough;
    - Decreased consciousness or confusion of recent onset;
    - New unexplained bruising or bleeding (without previous injury);
    - Persistent diarrhea; persistent vomiting (other than air sickness); headache with stiff neck; and/or
    - Appears obviously unwell.

- Consider, provision of Personal Protective Equipment (PPE) to employees, including gloves, face masks, and other forms of protection from surface or airborne transmission of the coronavirus.
  - Appropriate PPE will be dependent upon the type and frequency of potential contact faced by the workers.
  - PPE, if provided, should be properly fitted, consistently worn, and regularly inspected, maintained, and replaced as necessary to maintain effectiveness.
  - Industries for which PPE was previously required prior to the outbreak of the COVID-19 epidemic must continue to abide by existing PPE requirements, unless otherwise relieved by appropriate federal or state agency due to shortages associated with the epidemic.