Cal/OSHA COVID-19 General Guidelines

In May 2020 Cal/OSHA issued its "Interim General Guidelines" on Protecting Workers from COVID-19. Cal/OSHA's regulations require protection for workers exposed to airborne infectious diseases such as the coronavirus disease (COVID-19). The new guidance identifies specific infection control measures that are mandatory for California employers to implement and include in their Injury and Illness Prevention Program (IIPP) as required by 8 CCR §3203 and 8 CCR §1509 (construction). This Cal/OSHA guidance does not impose new legal obligations to employers.

According to Cal/OSHA's COVID-19 general guidelines employers are required to determine if COVID-19 infection is a potential workplace hazard. Given its widespread transmission throughout the community COVID-19 is a likely workplace hazard. Therefore, Cal/OSHA makes it mandatory to adopt changes to employer's IIPP that implements COVID-19 infection control measures. Infection control measures may vary by workplace. Cal/OSHA advises if COVID-19 is a workplace hazard, then employers must implement infection control measures, including applicable and relevant 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), and Coronavirus Disease 2019 (COVID-19): How to Protect Yourself & Others. Employers may adopt a written COVID-19 Management Plan and make it a part of the IIPP. This may be done by adding an addendum to the IIPP.

At a minimum, the COVID Management Plan should contain the following general components:

1. Measure aimed at minimizing the spread of sick employees
   - Encourage sick employees to stay home
   - Ensure employees who are out ill with fever or acute respiratory symptoms do not return to work until both of the following occur:
     - At least three full days pass with no fever (without the use of fever-reducing medications) and no acute respiratory illness symptoms; and
     - At least 10 days pass since the symptoms first appeared.
2. Utilize administrative and safe work practices as applicable
   - Practice physical distancing and maintaining a distance of at least 6 feet between persons at the workplace when possible.
   - Provide employees with cloth face covers or encourage employees to use their own face covers for use whenever employees may be in workplaces with other persons. Cloth face coverings are not personal protective equipment (PPE), but combined with physical distancing of at least six feet, they may help prevent infected persons without symptoms from unknowingly spreading COVID-19.
3. Establish procedure to routinely clean and disinfect commonly touched objects and surfaces such as elevator buttons, handrails, faucets and doorknobs.

- Surfaces should be cleaned with soap and water prior to disinfection.
- Use disinfectants that are EPA-approved.
- Provide disposable wipes for employees to wipe down commonly used surfaces before use such as shared tools.
4. Cal/OSHA IIPP regulations require employers to provide employees with training on new workplace hazards. This would include COVID-19. The training must be provided in a language that is readily understandable to all employees. Training may be part of "toolbox" or "tailgate" safety meetings. Topics should include:
- General description of COVID-19, symptoms, when to seek medical attention, how to prevent its spread, and the employer's procedures for preventing its spread at the workplace.
- How an infected person can spread COVID-19 to others even if they are not sick.
- How to prevent the spread of COVID-19 by using cloth face covers, including:
  - How cloth face covering can help protect persons around the user when combined with physical distancing and frequent hand washing.
  - Instructions on washing and sanitizing hands before and after using face coverings, which should be washed after each shift.
- Cough and sneeze etiquette.
- Washing hands with soap and water after interacting with other persons and after contacting shared surfaces or objects.
- Avoiding touching eyes, nose, and mouth with unwashed hands.
- Avoiding sharing personal items with co-workers including tools.

Current CDC guidelines do not recommend that the general public wear respirators or masks to protect against COVID-19. Consistent with CDC guidelines, and in light of current respirator and surgical mask shortages and their prioritization for health care workers, Cal/OSHA is not recommending respirators or masks for most workers at this time.

Bottom line: Attached is a "fillable form" COVID-19 Management Plan which may be helpful in preparing an addendum to your IIPP. This plan can be completed by inputting specific company information where indicated. It may not provide complete guidance and should be reviewed closely to align with Cal/OSHA COVID-19 industry guidelines and IIPP requirements.

Questions regarding Cal/OSHA guidelines may be addressed at
https://www.dir.ca.gov/dosh/coronavirus/General-Industry.html