

COVID-19 Workplace Safety and Health Checklist

Steps to consider to identify and address COVID-19 risks in the workplace

□ **Develop a Safety and Health Plan**

- Create a written plan outlining how you will address COVID-19 risks in the workplace. OSHA encourages employers to develop a safety and health plan, and some states require one. In developing your plan, review state and local requirements that apply to your business and guidance from the CDC, OSHA, and any state safety and health agency. Your plan should include topics like workplace hygiene, cleaning and disinfection, social distancing, the use of face coverings or protective equipment, employee testing, and training.
- Identify COVID-19 point-person(s) to oversee and update your safety plan.
- As you develop each part of your plan, create a list of supplies, including cleaning and disinfection products, soap and hand sanitizer, and protective equipment. Assess supply availability and adjust your plan accordingly.

□ **Workplace Hygiene**

- Encourage and provide opportunities for frequent hand washing with soap and water and the use hand sanitizer when soap and water is not available.
 - Consider whether to create hand washing or sanitizing requirements at defined intervals.
- Explain/post CDC-recommended practices for effective hand washing and the use of hand sanitizer, promote proper hygiene when coughing or sneezing, and encourage employees to actively avoid touching their eyes, nose, and mouth.

□ **Workplace disinfection**

- Create a plan for ongoing workplace disinfection and cleaning, including:
 - Disinfect high touch surfaces, like door handles or time clocks
 - Clean surfaces in frequently used areas, like break rooms, common rooms, and rest rooms.

- Clean and disinfect rooms between periods of use.
- Encourage or require employees to frequently clean and disinfect their work areas, providing supplies for this purpose.

- Create a plan for frequent deep cleaning and disinfection. If your plan involves the use of an outside contractor, review certifications, examine cleaning protocols, and develop an internal process to monitor performance.
- Create a deep cleaning plan to respond to a potential COVID-19 exposure in the workplace, like an employee who tests positive for the virus.

□ **Social Distancing Workplace Modifications**

- Evaluate the ways employees typically interact with each other and with the public in the workplace, and develop protocols to promote social distancing.
- Limit the number of employees in the workplace, if possible. Consider teleworking, alternate schedules, staggered shifts, and virtual meetings and trainings.
- Limit interactions with the public where possible, and encourage social distancing through methods like occupancy limits, visual cues, and barriers.
- Rethink space utilization to encourage social distancing.
 - Evaluate areas where employees are normally in close contact, like entrances and exits, breakrooms, restrooms, workspaces, and common areas. Implement steps to promote social distancing in each of these locations.

- Consider moving workstations; altering floor layouts; limiting occupancy in common rooms, breakrooms and elevators; and installing barriers.
- Evaluate workflow to limit contact.
 - Ensure that you have sufficient personnel tasked with controlling access and enforcing social distancing.
 - Rethink all aspects of workflow that require close contact, like handing off objects between employee.
 - Prohibit the sharing of common items if possible.
- Impose appropriate limits on employee travel.
- Determine if there are any state or local workplace modifications or travel restrictions.

□ **Face Coverings, Masks, Gloves, and Personal Protective Equipment**

- Review state and local rules and guidance regarding face coverings or masks. Some jurisdictions recommend the use of face coverings, others require it.
- If the use of face coverings, masks, gloves, or other personal protective equipment (PPE) is mandated by the employer and the local jurisdiction, in most circumstances the employer must pay for and provide it to employees.
- Evaluate employee job functions and the potential exposure risks, and tailor the use of personal protective equipment accordingly. For example, the exposure risks for cleaning staff or those conducting employee screenings are different than the exposure risks of an employee working in a private office.
- Check OSHA, CDC, and state and local guidance for industry-specific requirements and recommendations.
- Review and comply with OSHA and any state guidance or rules when using respirators, such as N95 masks.
- The time employees spend putting on or taking off protective equipment could be considered working time under federal, state, or local law, and thus, compensable and included in overtime calculations.

- Be prepared to discuss an employee's need for accommodations related to PPE requirements based on a disability or religious beliefs (e.g., to accommodate religious garb).

□ **Employee Screenings/Temperatures**

- Determine whether you will require employee screenings and the type of screening, for example temperature checks or employee questionnaires. Review EEOC guidance and any state or local screening mandates.
- In developing your screening process, review CDC, state, and local guidance. The screening process should be narrowly tailored to COVID-19 symptoms, and should not seek information about employees' health conditions or disabilities.
- Determine who will conduct screenings – employees, or an outside vendor?
- Ensure employee privacy and confidentiality during and after testing. Testing records are considered confidential medical records under the ADA and must be kept separate from an employee's personnel file.
- Those conducting and monitoring testing should have appropriate training and protective equipment.
- Plan how employees will wait for testing to prevent close contact and to maintain social distancing.
- Develop a procedure to implement in the event a screening reveals an employee has COVID-19 symptoms.
- The time employees spend waiting for and participating in screenings could be considered working time under federal, state, or local law, and thus, compensable and included in the calculation of overtime calculations.

□ **Training**

- Train employees on new policies, protocols, and rules, including on the use of face coverings or PPE.
- Determine if there are any additional federal, state or local COVID-19 training requirements.

□ **Workplace Rules and Policies**

- Post notices required by federal, state, and local law, and any hygiene/handwashing or social distancing reminders.
- Update Safety Data Sheets, including Safety Data Sheets for consumer cleaning and disinfection chemical products being used in the workplace.
- Review employee leave, Work from Home, and other policies.
 - Include EPSLA and EFMLEA policy if you employ fewer than 500 employees, and update policies to include any new or expanded state or local leave requirements enacted in response to the COVID-19 pandemic.
 - Review wage and hour policies, and if appropriate, address employee time related to protective equipment or testing.

- Consider CDC guidance, and create a protocol for addressing an employee's report of COVID-19 symptoms, exposure, quarantine or self-isolation, or confirmed diagnosis.

□ **Reporting Requirements**

- Review OSHA COVID-19 injury and illness recording and reporting requirements.
- Determine any reporting requirements required by state or locality.

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