

COVID-19 & OSHA

HOW TO PREPARE FOR RETURN TO OFFICE WORK AND POTENTIAL OSHA COVID REGULATIONS

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With the new Biden Administration firmly in control and the COVID-19 pandemic still soaring, we expect that OSHA will issue standards for returning to work in an office environment. To get ahead and make a return to work safe for employers and potential clients that come to visit, below you will find some tips. These tips have not been mandated, but are reasonably expected to be adopted, at least in part.

- **Conduct a workplace exposure risk assessment:** In mitigating risk, the first step is to determine vulnerabilities. Consider hiring an industrial hygienist. They are not as expensive as you can imagine. Hygienists can assist with the barriers and social distancing aspect of your risk assessment; more importantly, they can do air quality tests and determine what upgrades should be made to the HVAC system. Potential upgrades would include HEPA filters and ultraviolet lights. Let's be honest, the CDC keeps discussing the importance of ventilation. They suggest keeping doors and windows open, which is rarely possible for offices. We must think of other ways to control and increase ventilation.
- **Appoint a COVID-19 OFFICER:** Businesses should appoint a COVID-19 officer to ensure a successful plan is developed, disseminated, evaluated, and updated. Appointments can be made by a special committee.
- **Develop a written COVID-19 preparedness plan:** The Preparedness Plan should include requirements for social distancing, masks, worker notice, and workplace sanitizing. If there's one thing COVID-19 taught us, it is the need for businesses to establish an infectious disease control plan. This "once in a lifetime pandemic" is capable of repetition and companies should be on notice to develop such a plan, which could become mandated. It is also the smart thing to do. How many hours have been lost to the common cold and flu? This is preventable. Be sure to include providing hand sanitizer to employees and have stations throughout the office. Other things to consider are, social distancing, mask policies, barrier control, and regular cleaning of high touch areas. Eliminate or reducing conference room meetings as much as possible in favor of online meetings.
- **Implement employee, contractor, and visitor screening procedures:** It is more important than ever that we screen employees, vendors, and guests before they walk into a business. Consider having each person complete a COVID-19 questionnaire online or in

person before entering. Those that are high-risk should be denied entry, Temperature checks should also be considered. Provide disposable masks and hand sanitizers for those who forgot.

- **Identify high risk employees and keep them working from home if possible.**
- **Conduct employee training regarding safe work procedures:** Educating employees on the expectations of the policies and procedures, as well as what to do if they feel sick in the workplace, is crucial to a successful program. An organization should also have a sanction policy in place for employees who just do not comply and put the rest of employees at risk.
- **Contingency Plan:** Think ahead and have a plan in place if your workplace has had an exposure or outbreak of COVID-19. What steps are taken to mitigate, including potentially closing the office for 14 days and doing a professional deep clean.
- **Don't rush:** Consider a return to office in stages so the risk plan can be tested before all employees return to work.

COVID-19 has taught us just how fragile life is and the need for companies to weigh their business needs against employee safety and develop a well thought out plan to keep employees, clients, and vendors safe as we start to return to the office. Safety First should be the main focus.

We hope this information is helpful to you. Please give us a call if we can be of assistance to you with Health & Welfare Compliance, Actuarial Services, Healthcare Reform, HIPAA Security, and COBRA/Retiree Billing Administration.

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