Return to Work & Prevent The Spread of COVID

CHECKLIST

RETURN TO WORK AND PREVENT THE SPREAD OF COVID CHECKLIST

Use the following checklist as an aid to help your organization return to work during the COVID-19 pandemic in a safe and healthy manner. This checklist is based on the 11-point COVID-19 return-to-work guidance detailed in the June 10, 2021 OSHA publication, "Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace."

OSHA Prevention Program Element	Description	Complete?	Notes
1. Grant paid time off for employees to get vaccinated.	OSHA and The Department of Labor are working to ensure easy access to vaccinations. Businesses with 500 employees or less may also be eligible for tax credits under the American Rescue Plan. *Note: Refer to the IRS guidance on American Rescue Plan tax credits.*		
2. Instruct workers to stay home if they are infected with COVID-19, are unvaccinated and have had close contact with someone with COVID-19, or have COVID-19 symptoms.	Ensure that COVID-related absence policies are non-punitive. Eliminate or revise policies that encourage any employees to come to work while ill or symptomatic, or that encourage unvaccinated workers to come to work after COVID-19 exposure. *Note: Providing COVID-related paid sick and family leave may make you eligible for American Rescue Plan tax credits.*		
3. Implement physical distancing for unvaccinated and otherwise at-risk workers in all communal work areas.	If your work environment does not facilitate proper social distancing, consider implementing: • Flexible operations (ex: teleworking) • Flexible hours (ex: staggered or rotated shifts) • Remote services (ex: video meetings) • Flexible meeting and travel options • Physical barriers (ex: shields or plastic sheeting) *Note: Six feet of distance is generally recommended, although this may not guarantee safety in enclosed or poorly-ventilated spaces. When implementing distancing measures, ensure that barriers prevent direct transmission of respiratory droplets.*		

OSHA Prevention Program Element	Description	Complete?	Notes
4. **Provide unvaccinated and otherwise at-risk workers with face coverings or surgical masks, unless their work task requires a respirator or other PPE.**	Unvaccinated and at-risk workers should receive these masks at no cost. Depending on the nature of work operations, they may need frequent replacements. Ensure that these masks are double-layered, breathable, and made of tightly-woven fabric. *Note: Refer to* CDC guidance *to learn more about effective masks, and remember that you may need to provide* reasonable accommodation *for those who may have difficulty wearing face coverings due to a disability or religious belief.*		
5. **Educate and train workers on COVID policies and procedures.**	Clearly and regularly communicate workplace policies in plain language using multiple methods of communication. If needed, provide this information in several languages. *Note: This should include: basic facts about COVID; workplace policies and procedures; information about the right to safe and healthy workplace; whom to contact with concerns; and the right to raise safety and health issues without fear of retaliation.*		
6. **Suggest that unvaccinated customers, visitors, or guests wear face coverings.**	Communicate this guidance using posted signage. Individuals under the age of two or those actively eating or drinking need not wear face coverings. *Note: Consistent mask-wearing is particularly important in public-facing workplaces that may include unvaccinated or at-risk workers, customers, or guests.*		

OSHA Prevention Program Element	Description	Complete?	Notes
7. Maintain ventilation systems.	Maintaining and improving indoor ventilation can reduce the concentration of viral particles and reduce the risk of COVID-19 transmission. *Note: Review ventilation from the* CDC *and* OSHA *for guidance and best practices.*		
8. Perform routine cleaning and disinfection.	If someone with suspected or confirmed COVID-19 has been in the facility within 24 hours, perform comprehensive disinfection. *Note: Follow* CDC cleaning and disinfection guidance, *as well as OSHA standards for hazard communication and proper PPE for exposure to cleaning chemicals.* • OSHA 1910.1200 • OSHA 1910.132 • OSHA 1910.133 • OSHA 1910.138		
9. Record and report COVID-19 infections and deaths.	Follow OSHA 29 CFR 1904 requirements to ensure that work-related) COVID-19 illness, hospitalizations, and fatalities are properly recorded on Form 300 logs and reported to OSHA and necessary health departments. *Note: Until May 2022, OSHA will not enforce 29 CFR 1904's requirement to record worker side effects from employee COVID-19 vaccinations. In accordance with mandatory OSHA standard* 29 CFR 1904.35(b), *employers may not discriminate against employees who report work-related illnesses.*		

OSHA Prevention Program Element	Description	Complete?	Notes
10. **Implement protections from retaliation and establish anonymous COVID concern reporting.**	Notify workers of their right to a hazard-free workplace and ensure that they know who to contact with relevant concerns. Employers may not discriminate against employees for raising relevant COVID concerns		
11. **Follow other applicable mandatory OSHA standards.**	Relevant standards include but are not limited to: • 1910.132 and 1910.133, PPE • 1910.134, Respiratory Protection • 1910.141, Sanitation • 1910.1030, Bloodborne Pathogen Protection • 1910.1020, Employee Access to Medical and Exposure Records • 1910.1200, Hazard Communication • OSH Act Section 5(A)(1), General Duty Clause		

In addition to the above checklist, there are several points of return-to-work guidance that OSHA recommended to employers earlier in the pandemic that are still relevant, particularly as COVID-19 cases rise and the Delta variant becomes more prevalent.

Relevant recommendations include the following:

OSHA Prevention Program Element	Description	Complete?	Notes
Conduct a hazard assessment and identify workplace COVID-19 risks	Identify where and how employees may be exposed to the virus at work. *Note: Refer to this OSHA guidance on* COVID hazard recognition.		
Identify measures to limit the spread of COVID at work	Following the principles of the Hierarchy of Controls, identify measures that will limit the spread of COVID in your workplace. *Note the following guidance:* **1.** *Eliminate hazards by separating and/or sending home infected and potentially infected workers and implementing physical distancing.* **2.** *Isolate workers from the hazard and create barriers where physical distancing can't be maintained (ex: have employees wear face coverings and improve workplace ventilation).* **3.** *Provide necessary supplies for proper hygiene.* **4.** *Change the way work is performed to improve COVID safety measures.* **5.** *Provide necessary supplies for proper hygiene.* **6.** *Routinely clean and disinfect the workplace and common areas.*		

OSHA Prevention Program Element	Description	Complete?	Notes
Consider protections for high-risk workers through supportive policies and procedures	Develop policies and practices that protect high-risk workers and satisfy the "reasonable accommodations" requirement. *Note: This includes older workers, workers with pre-existing conditions, etc. Learn more about reasonable accommodations here.*		
Establish a system for communicating effectively	Ensure that employees can report COVID symptoms or exposures in a language they understand without fear of reprisal. *Note: Consider implementing a two-way communications system that enables workers to quickly and easily self-report COVID symptoms or exposure and employers to inform workers of policies and updates.*		
Minimize negative impacts of isolation and quarantine on workers	Consider allowing teleworking or establishing isolated work areas. If available, establish paid leave policies that reduce risk to everyone in the workplace.		
Provide guidance to employees on screening and testing	Follow state and local guidance for workplace screening and testing. Inform employees of testing requirements and options.		

Completing this checklist is an important first step in establishing an effective prevention plan for your workplace. However, this guidance alone does not guarantee worker health and safety or OSHA compliance. Always review OSHA standards and guidance as well as information from the CDC and similar federal/state/local authorities, keep up to date with the current science on this evolving situation, and apply current best practices.

Here are some helpful additional resources:

- CDC COVID Resources:
  https://www.cdc.gov/coronavirus/2019-ncov/

- OSHA Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace (Jan, 2021):
  https://www.osha.gov/coronavirus/safework

- OSHA COVID Resources:
  https://www.osha.gov/coronavirus

- OSHA 3990 'Guidance on Preparing Workplaces for COVID-19' (2020):
  https://www.osha.gov/Publications/OSHA3990.pdf

- AIHA COVID Resources:
  https://www.aiha.org/public-resources/consumer-resources/coronavirus_outbreak_resources

- NIH COVID Return to Work Tool:
  https://tools.niehs.nih.gov/wetp/covid19worker/index.cfm

- ASSP COVID Resources:
  https://www.assp.org/resources/covid-19/latest-resources

- Vector Solutions "Vector Cares" Free COVID Courses:
  https://www.vectorsolutions.com/about-us/vector-cares/coronavirus/

RETURN TO WORK/PREVENT THE SPREAD SOLUTIONS

- Online health & safety training courses
- Learning management system (LMS)
- EHS management software
- Mobile risk communication & intelligence software platform
- More

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