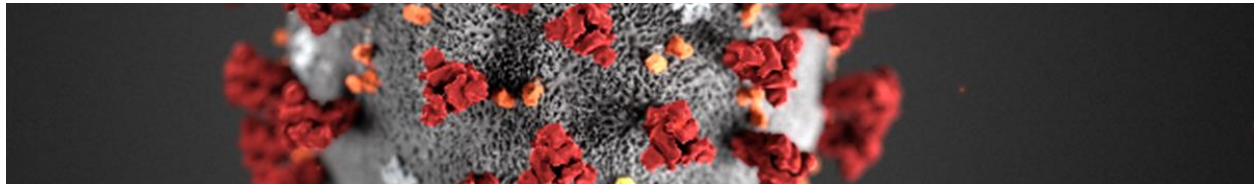


BuildLACCD Safety Bulletin

July 2020

COVID-19



Recording workplace exposures to COVID-19

OSHA recordkeeping requirements mandate covered employers' record certain work-related injuries and illnesses on their [OSHA 300 log \(29 CFR Part 1904\)](#).

COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are true:

1. The case is a confirmed case of COVID-19 (see [CDC information](#) on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19);
2. The case is work-related (as defined by [29 CFR 1904.5](#)); and
3. The case involves one or more of the general recording criteria set forth in [29 CFR 1904.7](#) (e.g., medical treatment beyond first aid, days away from work).

Employers should also consult OSHA's enforcement memos for recording cases of COVID-19, effective [through May 25, 2020](#) and [beginning on May 26, 2020](#).

Visit OSHA's [Injury and Illness Recordkeeping and Reporting Requirements page](#) for more information.

This section highlights OSHA standards and directives (instructions for compliance officers) and other related information that may apply to worker exposure to the novel coronavirus, SARS-CoV-2, that causes Coronavirus Disease 2019 (COVID-19).

OSHA requirements apply to preventing occupational exposure to SARS-CoV-2. Among the most relevant are:

- OSHA's Personal Protective Equipment (PPE) standards (in general industry, [29 CFR 1910 Subpart I](#)), and, in construction, [29 CFR 1926 Subpart E](#)), which require using gloves, eye and face protection, and respiratory protection when job hazards warrant it.
 - When respirators are necessary to protect workers, employers must implement a comprehensive respiratory protection program in accordance with the Respiratory Protection standard ([29 CFR 1910.134](#)).

- The General Duty Clause, [Section 5\(a\)\(1\)](#) of the [Occupational Safety and Health \(OSH\) Act of 1970](#), 29 USC 654(a)(1), which requires employers to furnish to each worker "employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm."

OSHA's Bloodborne Pathogens standard ([29 CFR 1910.1030](#)) applies to occupational exposure to human blood and other potentially infectious materials that typically do not include respiratory secretions that may contain SARS-CoV-2 (unless visible blood is present). However, the provisions of the standard offer a framework that may help control some sources of the virus, including exposures to [body fluids](#) (e.g., respiratory secretions) not covered by the standard.

State Standards

There are 28 [OSHA-approved State Plans](#), operating statewide occupational safety and health programs. State Plans are required to have standards and enforcement programs that are at least as effective as OSHA has and may have different or more stringent requirements.

The California Division of Occupational Safety and Health (Cal/OSHA) [Aerosol Transmissible Diseases \(ATD\)](#) standard is aimed at preventing worker illness from infectious diseases that can be transmitted by inhaling air that contains viruses (including SARS-CoV-2), bacteria or other disease-causing organisms. While the Cal/OSHA ATD standard is only mandatory for certain healthcare employers in California, it may provide useful guidance for protecting other workers exposed to SARS-CoV-2.

Employers must also protect their workers from exposure to [hazardous chemicals used for cleaning and disinfection](#). Employers should be aware that common sanitizers and sterilizers could contain hazardous chemicals. Where workers are exposed to hazardous chemicals, employers must comply with OSHA's Hazard Communication standard (in general industry, [29 CFR 1910.1200](#)), Personal Protective Equipment standards (in general industry, [29 CFR 1910 Subpart I](#), and, in construction, [29 CFR 1926 Subpart E](#)), and other applicable OSHA chemical standards.

Other relevant OSHA standards

Depending on the specific work task, setting, and exposure to other biological or chemical agents, additional OSHA requirements that may apply include:

Construction (29 CFR 1926)	Reference	Related Information
Subpart C – General Safety and Health Provisions	1926.33 , Access to employee exposure and medical records	
Subpart D – Occupational Health and Environmental Controls	1926.51 , Sanitation	<ul style="list-style-type: none"> ▪ Federal Register notices ▪ Letters of interpretation

