

Compliance Alert: The 14 COVID-19 Prevention Measures You Need to Be Implementing Right Now



If your work facility is still open and operating, you must ensure that all workers are protected against coronavirus exposure. OHS and public health officials have made that abundantly clear. But the regulators haven't done as good a job in explaining what exactly employers are supposed to do. Sure, there's guidance, but it's piecemeal, uneven and pretty generic. Having looked at all the current OHS guidance across Canada and U.S. OSHA, we've assembled the nuggets into a 14-point checklist of best practices that you can use to audit your own COVID-19 response measures.

1. Doing a COVID-19 Hazard Assessment

First, do a walk-through of the workplace to identify tasks and conditions involving risk of exposure. Guidelines from U.S. OSHA call on employers to do a job-based assessment grouping positions into 4 levels of risk classification ranging from very high to low, as summarized in Table 1.

Table 1. COVID-19 Exposure Risk Job Classifications

Risk Classification	Jobs Included in Classification
Very High	Healthcare workers that treat patients with or suspected of having COVID-19 (which we'll refer to throughout as "patients")
High	*Healthcare delivery and support staff, e.g., hospital phlebotomists who must enter a patient's room *Medical transport workers moving COVID-19 patients in enclosed vehicles
Medium	Jobs requiring frequent and/or close contact with (i.e., within 6 feet) people who may be infected but aren't patients, e.g., at airports or retail stores
Lower	Jobs not requiring frequent/close contact with people who may be infected

2. Implementing Engineering Controls

Once you do your risk classification, consult with the workplace JHSC or health and safety rep on solutions to each risk you identify, based on job classification starting with engineering controls that physically eliminate or isolate the COVID-19 hazard. Table 2 lists examples of the engineering controls to consider for each risk classification.

Table 2. Engineering Controls for COVID-19 Exposure

Risk Classification	Appropriate Engineering Controls
Very High + High	*Ensuring appropriate air-handling systems are installed + maintained *Placing patients in an airborne infection isolation room, if there is one *Using isolation rooms to do aerosol-generating procedures on patients
Medium	Installing physical barriers, like clear plastic sneeze guards, if feasible
Lower	None

3. Social Distancing

The next layer of protection is the implementation of administrative, aka work controls, that make the work safer by adjusting the methods used to carry it out. There are 11 vital administrative controls for COVID-19 containment, starting with social distancing, i.e., ensuring the workplace is set up and people are required to keep at least 6 feet/2 meters apart, including within vehicles.

4. Keeping Sick, Symptomatic & High Risk Workers Home

Ensure that workers who are ill, have symptoms or otherwise pose a high risk, e.g., workers with infected spouses at home or who've traveled to high risk areas, self-isolate and work from home in accordance with public health guidance.

5. Letting Workers Work Remotely

Another dimension of social distancing is allowing workers who aren't sick to do their jobs from home as a precautionary measure. Prioritize core work that needs to be done at the workplace and determine where this core work can be safely and productively performed from, i.e., at a safe distance from others in the workplace. Take measures to protect the health and safety of workers who work from home.

6. Hand Washing, Hand Washing & Hand Washing

Require workers to wash their hands frequently. Provide soap and water or hand sanitizers and post instructions on proper hand washing technique.

7. Cough & Sneeze Etiquette

Show workers how and insist they follow "etiquette" by properly covering their

mouths when they sneeze or cough.

8. Staggering Shifts

If possible, stagger work shifts to reduce the number of workers present at the workplace.

9. Regular Workplace Cleaning & Disinfection

Ensure the workplace is cleaned with proper disinfectants between shifts and as often as necessary to prevent infection, in accordance with public health guidelines. Pay particular attention to high-contact items such as door handles, faucet handles, keyboard and shared equipment.

10. Method for Reporting COVID-19 Exposure Concerns

Establish a system for workers to inform their supervisor or company representative of concerns about potential workplace exposure to COVID-19, e.g., via the JHSC.

11. Means of Communication

Ensure information about COVID-19 in the workplace is being communicated to all workers.

12. COVID-19 Information & Education

Make sure all workers are instructed and understand:

- What COVID-19 is;
- How it spreads;
- The risks of exposure and infection;
- How to protect themselves from those risks;
- How to recognize the signs and symptoms of COVID-19; and
- What to do if they experience symptoms.

13. PPE

The final line of defence is making sure workers have and properly use, inspect and clean appropriate PPE. U.S. OSHA guidelines recommend selecting PPE on the basis of the job risk classifications you use to do your COVID-19 hazard assessment.

Table 3. PPE for COVID-19 Exposure

Risk Classification	Appropriate PPE
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	*Gloves + gown + face shield or goggles + either: >A face mask; or >A respirator if worker works in contact with or within
Very High + High	6 feet of patients known to be, or suspected of being infected *Workers in labs may also need medical/surgical gowns, fluid resistant coveralls, aprons or other disposable or reusable clothing protecting additional against blood, body fluids, chemicals and other materials to which they may be exposed
Medium	Combination of gloves, a gown, a face mask, and/or a face shield or goggles depending on job and degree of exposure
Lower	Gloves (which may be extended to include a face mask in accordance with public health guidance as the COVID-19 situation gets worse)

14. Monitoring Your Control Measures

The COVID-19 situation is evolving rapidly and you need to monitor public health agencies and ensure your prevention measures are up to date with the latest guidance. Thus, for example, some public health agencies are now advising that people wear face masks any time they leave their home. And, of course, you'll also need to revise your measures on the basis of developments in your own workplace, such as worker complaints or other indications that corrections are needed.