COVID-19 Workplace Requirements for Manufacturing

SUMMARY OF MIOSHA EMERGENCY RULES

Important Note

MDHHS has issued COVID-19 Public Health Orders regarding requirements about face coverings for the public, gathering limitations, and other public health concerns.

Please visit Michigan.gov/Coronavirus for information on these public health orders.

The requirements in this presentation are required by MIOSHA Emergency Rules for COVID-19.

Overview

- Requirements for All Workplaces
  - Definitions
  - Exposure Determination
  - COVID-19 Preparedness & Response Plan
  - Basic Infection Control Measures
  - Health Surveillance
  - Workplace Controls
  - Person Protective Equipment
  - Employee Training
  - Recordkeeping
- Additional Requirements for Manufacturing

MIOSHA Emergency Rules for COVID-19

REQUIREMENTS FOR ALL WORKPLACES

Definitions

- **Close Contact**: someone who was within 6ft of an infected person for at least 15 minutes starting from 2 days before illness onset (or for asymptomatic persons, 2 days prior to specimen collection) until the time the person is isolated
- **COVID-19**: coronavirus disease 2019, a severe acute respiratory disease characterized by symptoms including fever, cough, fatigue, and shortness of breath which may progress to pneumonia, multi-organ failure, & death
- **Known Cases of COVID-19**: person who have been confirmed through diagnostic testing to have COVID-19
- **SARS-CoV-2**: severe acute respiratory syndrome coronavirus 2, the virus which is the causative agent of COVID-19
- **Suspected Cases of COVID-19**: persons who have symptoms of COVID-19 but have not been confirmed through diagnostic testing or person who have had close contact with a person who has been confirmed through diagnostic testing

Exposure Determination

- Evaluate routine & reasonably anticipated tasks/procedures to determine actual OR reasonably anticipated exposures to SARS-CoV-2
- Categorize tasks/procedures into the following risk categories:
  - Lower Exposure Risk
  - Medium Exposure Risk
  - High Exposure Risk
  - Very High Exposure Risk
- Use OSHA guidance for additional resources for exposure determination
  - Guidance on Preparing Workplaces for COVID-19
  - COVID-19 Hazard Recognition

Exposure Determination

Exposure Risk Categories

- Lower Exposure Risk
  - Tasks do not require contact with people known or suspected of being infected with SARS-CoV-2
  - Tasks do not have frequent close contact with the public
  - Workers have minimal occupational contact with coworkers & the public
- Medium Exposure Risk
  - Tasks require frequent OR close contact with people who may be infected with SARS-CoV-2, but who are NOT a known/suspected COVID-19 patient
  - In areas with ongoing community transmission, workers that have contact with the public (schools, high-population-density work environments, high-volume retail settings)
  - In areas without ongoing community transmission, workers that have frequent contact with travelers from areas with ongoing community transmission

Exposure Determination

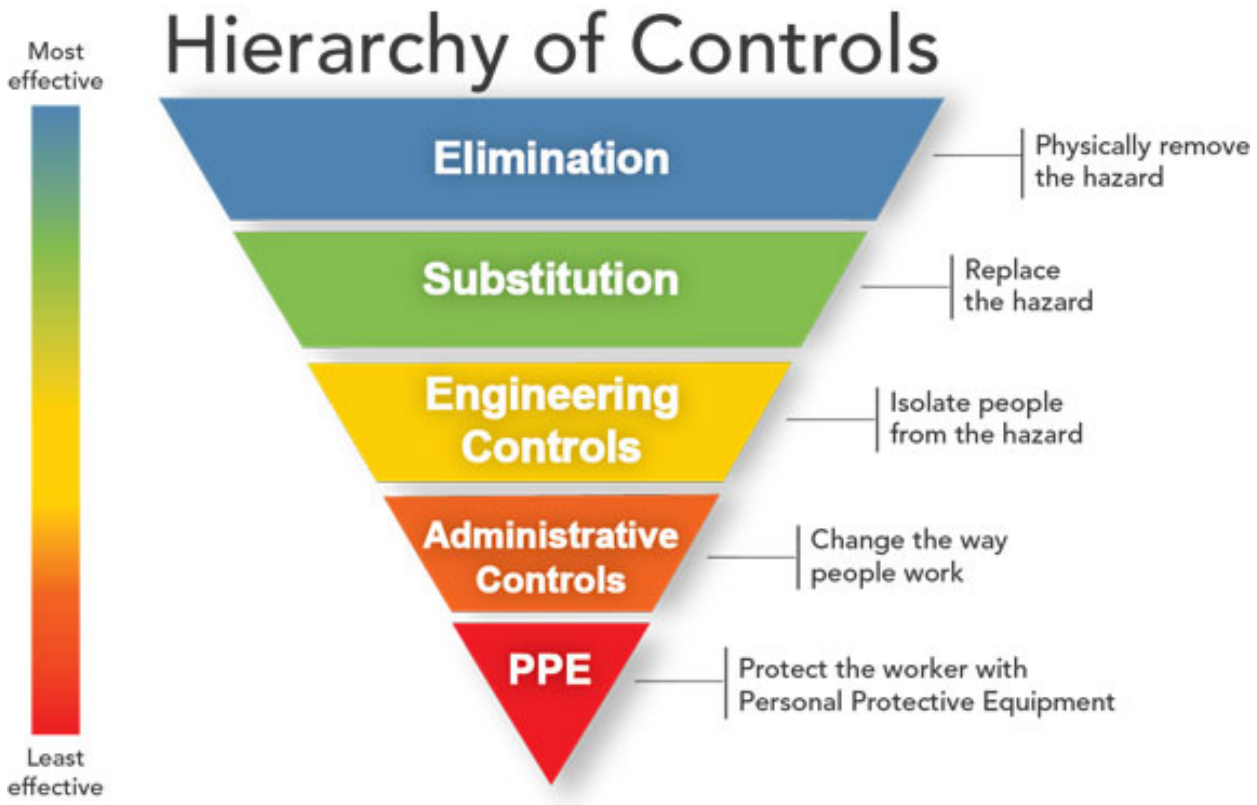
Exposure Risk Categories (cont.)

- High Exposure Risk
  - Tasks with high potential for exposure to known or suspected sources of COVID-19
  - Worker could include: licensed health care professionals, medical first responders, nursing home employees, law enforcement, correctional officers, or mortuary workers
- Very High Exposure Risk
  - Tasks with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures
  - Workers could include:
    - Healthcare workers (doctors, nurses, dentists, paramedics, EMTs) performing aerosol-generating procedures on known/suspected COVID-19 patients
    - Healthcare or Laboratory workers collecting or handling specimens from known/suspected COVID-19 patients
    - Morgue workers performing autopsies on bodies of people who are known/suspected of having COVID-19 at the time of their death

COVID-19 Preparedness & Response Plan

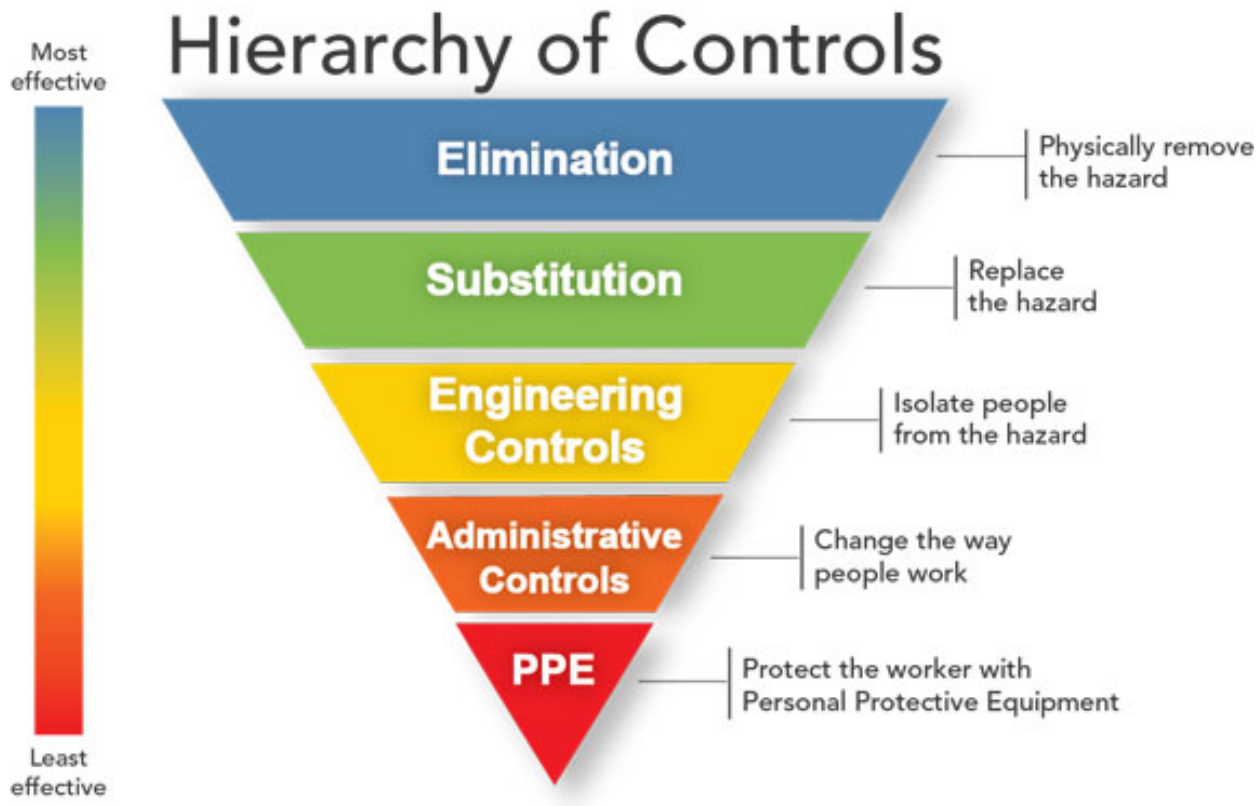
MIOSHA Sample COVID-19 Preparedness & Response Plan for Low-Med Risk Employees

- Develop & Implement a written COVID-19 Preparedness & Response plan
- Use current OSHA guidance for COVID-19 - Guidance on Preparing Workplaces for COVID-19
- Use current CDC COVID-19 guidance
- The preparedness & response plan **shall** include the employee exposure determination & **shall** detail measures to prevent employee exposure, including any:
  - Engineering Controls
  - Administrative Controls
  - Basic Infection Prevention Measures
  - Person Protective Equipment
  - Health Surveillance
  - Training
- The employer **shall** make the preparedness & response plan readily available to employees & their representatives (website, internal network, or hardcopy)



COVID-19 Preparedness & Response Plan

- Examples of Engineering Controls
  - High-efficiency Air Filters
  - Increased Ventilation Rates
  - Physical Barriers – Clear plastic barriers, sneeze guard, plexiglass
  - Installing a drive-thru window



COVID-19 Preparedness & Response Plan

- Examples of Administrative Controls
  - Restrict non-essential business travel
  - Encourage hand washing and use of hand sanitizer through posters and training
  - Promote remote work
  - Implement rotational shift schedules to reduce the number on employees onsite at the same time
  - Stagger meal and break times
  - Use posters, signs, barriers, or floor markings to reduce congestion

Basic Infection Prevention Measures

- The employer **shall**:
  - Promote frequent & thorough handwashing, including by providing workers, customers, & worksite visitors a place to wash hands; Provide antiseptic hand sanitizer or alcohol-based hand towelettes containing 60% alcohol when soap & water are unavailable
  - Require workers who are sick to not report to work or work in an isolated location
  - Prohibit workers from using other workers' phones, desks, offices, or other work tools & equipment when possible
  - Create policy prohibit in-person work for employees to the extend that their work activities can feasibly be performed remotely

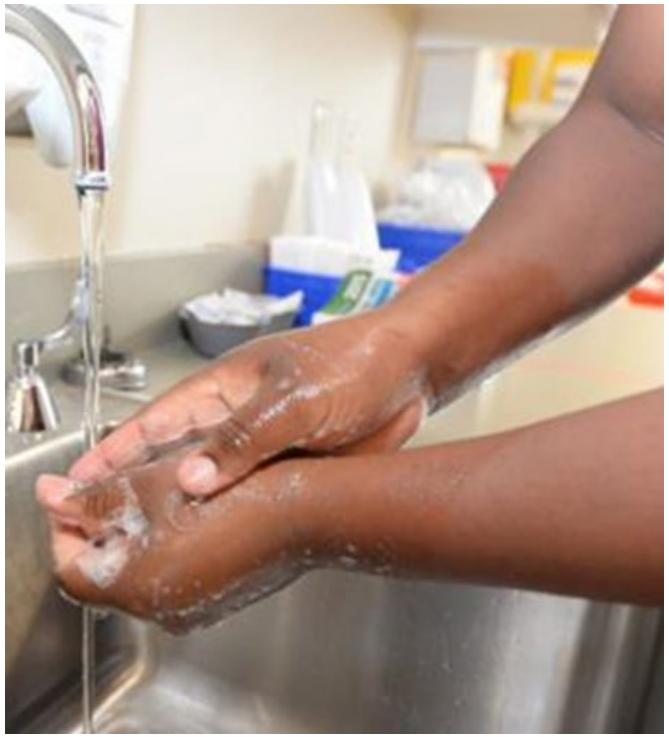


Photo: U.S. Department of Defense

Basic Infection Prevention Measures (cont)

- The employer **shall**:
  - Increase facility cleaning & disinfection to limit exposure to SARS-CoV-2; focus on:
    - High touch surfaces (e.g. door handles)
    - Parts, products, and shared equipment (e.g tools, machinery, and vehicles)
  - Use EPA approved disinfectants expected to be effective against SARS-CoV-2: List N
  - Follow manufacturer's instructions for cleaning & disinfection products (e.g. concentration, application method, contact time, and PPE)

This Photo by Unknown Author is licensed under CC BY-SA

Basic Infection Prevention Measures (cont.)

General Information

- Cleaning
  - The removal of germs, dirt, and impurities from surfaces. Removes, but does not kill germs
  - Use soap & water
- Disinfecting
  - The use of chemicals to kill germs on surfaces. Does not necessarily remove germs from a surface
- Common Disinfectants
  - EPA List N: Disinfectants for Coronavirus
  - Bleach Solution - ⅓ cup bleach per gallon water or 4 teaspoons bleach per quart water
  - 70% alcohol solutions may also be used – wipes or liquid

Health Surveillance

- The employer **shall** conduct a daily entry self-screening protocol

For all employees and contractors entering the workplace

At minimum, a questionnaire that includes questions about:

Symptoms of COVID-19	Contact with individuals known or suspected COVID-19

Temperature Screening (if possible)

Health Surveillance (cont.)

- The employer **shall**:
  - Direct employers to promptly report any signs & symptoms of COVID-19 their experiencing to the employer before OR during the work shift
  - Physically isolate any employees know or suspected to have COVID-19 from the remainder of the workforce, using measure such as, but not limited to:
    - Not allowing known/suspected cases to report to work
    - Sending know/suspected cases away from the workplace
    - Assigning known/suspected cases to work alone at a remote location (e.g. their home), as their health allows

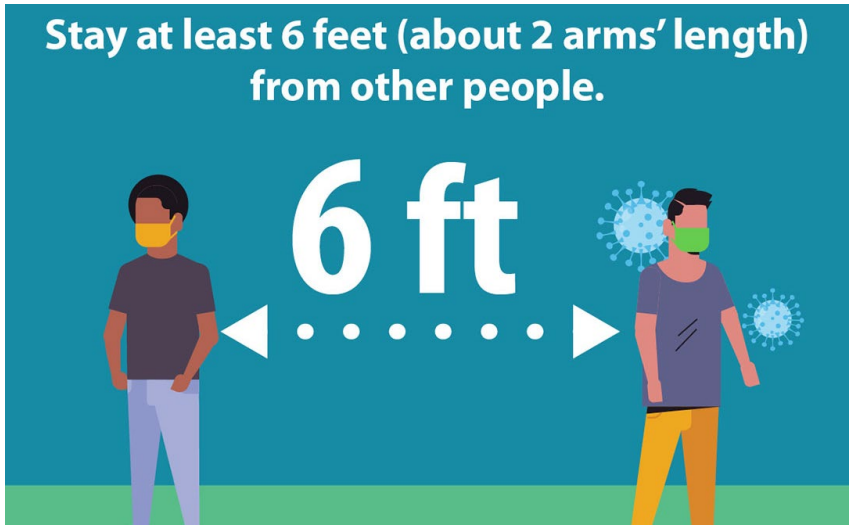
Health Surveillance (cont.)

- When an employer learns of an employee, visitor, or customer with a known case of COVID-19, the employer **shall**:
  - Immediately notify the local public health department AND
  - Within 24 hours of learning of the known case, notify any co-workers, contractors, or suppliers who may have come into contact with the person with a known case of COVID-19
- Employer **shall** allow employees with a known/suspected case of COVID-19 return to the workplace only after:
  - The individual is no longer infectious according to the latest guidelines from the CDC AND
  - The individual is released from any quarantine or isolation order by the local public health department

- CDC Guidance for Return to Work for Persons with COVID-19 Not in Healthcare
- CDC Guidance for Return to Work for Healthcare Personnel with COVID-19

Workplace Controls

- The employer **shall** designate one or more worksite COVID-19 safety coordinator
  - COVID-19 Safety Coordinator
    - Must Implement, monitor, & report on the COVID-19 control strategies required for the worksite
    - Must remain on-site at all times when employees are present on site
    - An on-site employee may be designated to perform the COVID-19 safety coordinator role
- The employer **shall** place posters in the languages common in the employee population that encourage staying away from work when sick, cough & sneeze etiquette, and proper hand hygiene practices

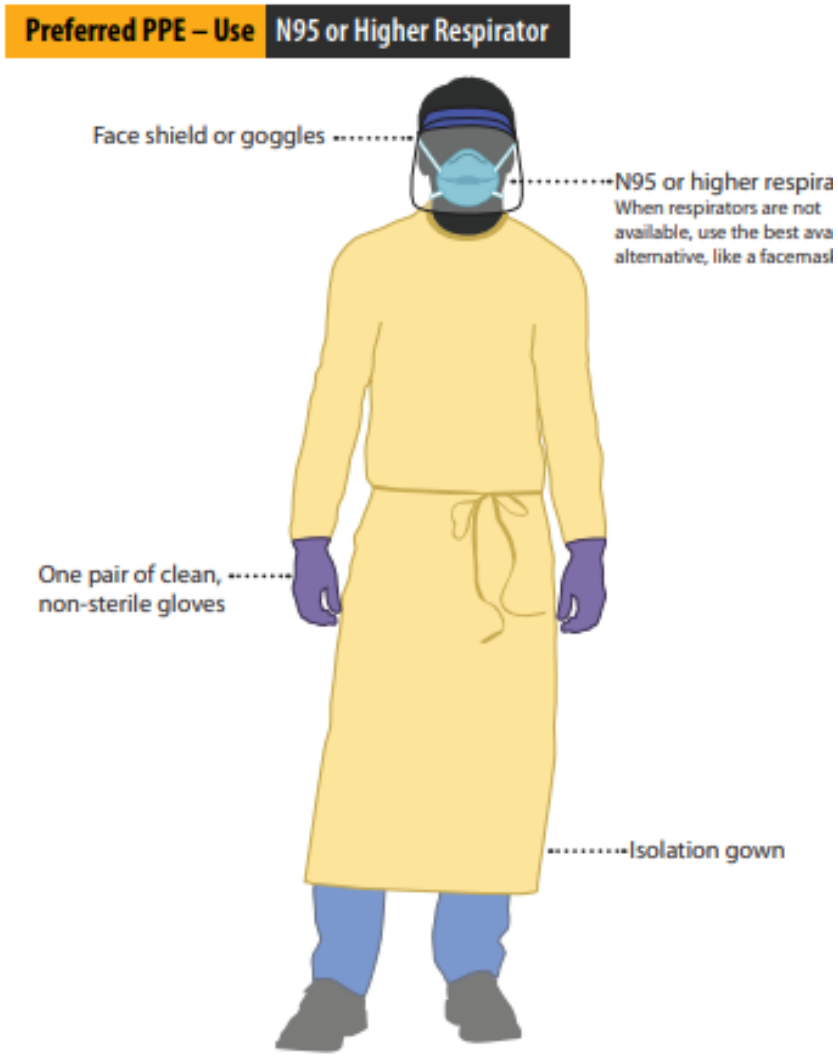


Workplace Controls (cont.)

- The employer **shall**:
  - Keep everyone on the worksite at least 6ft from one another and reduce congestion
    - Use ground markings, signs and physical barriers as appropriate to ensure social distancing and reduce congestions
  - Provide non-medical grade face coverings to their employees
  - Require face coverings when employees cannot consistently maintain 6ft of separation from others
  - Consider face shields (in addition to face coverings) when employees are unable to consistently maintain 3ft of separation from others
  - Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways

Personal Protective Equipment (PPE)

- The employer **shall**:
- Provide employees with types of PPE, including respirators as necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job
- Ensure PPE is:
  - Properly worn
  - Used consistently
  - Regularly inspected, maintained, and/or replaced (as necessary)
  - Properly removed, cleaned, and stored or disposed of to avoid contamination to self, others, or the work environment



Personal Protective Equipment (cont.)

- In establishments that provide medical treatment or house know/suspected cases of COVID-19, the employer **shall** ensure that employees in frequent or prolonged close contact with such cases are provided with and wear, ***at a minimum***:
  - N-95 respirator
  - Goggles or face shield AND
  - Gown

Face Coverings vs Respirators

COVID-19
FACEMASKS VS. RESPIRATORS

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC OPPORTUNITY | MIOSHA

	Cloth or Paper Face Mask	Surgical Face Mask	Filtering Facepiece Respirator (e.g. N95)
Testing & Approval	Not tested or approved, but recommended by the CDC	Cleared by the U.S. Food and Drug Administration per 21 CFR 878.4040	Evaluated, tested and approved by NIOSH per 42 CFR Part 84
Intended Use & Purpose	To prevent transmission of the virus between people in close proximity	A fluid resistant barrier designed to protect the wearer from large droplets, splashes or sprays of bodily or other hazardous fluids.	Reduces the wearer's exposure to small particle aerosols and large droplets

COVID-19
VOLUNTARY VS. REQUIRED RESPIRATOR USE

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC OPPORTUNITY | MIOSHA

The employer determines the necessary PPE required for the job task(s). The employer is responsible for payment, replacement, maintenance, cleaning, laundering and disposal of PPE. Training should be provided to employees regarding proper use, limitations, care and maintenance of PPE. Where respirators are provided, the following table outlines additional requirements:

Guidelines for Employees Using Respiratory Protection

Filtering Facepiece Respirator (e.g. N95)		
	Required	Voluntary
Fit Testing	Yes	No
Medical Evaluation	Yes	No
Facial Hair Prohibited	Yes	No
Appendix D Provided	No	Yes
Training per 1910.134(k)	Yes	No
Cleaning, Storage & Maintenance of Respirator	Yes	Yes

- Know the difference between cloth face coverings and respirators
- NIOSH Certified Respirators require compliance to the Respiratory Protection Program
- Facemasks vs Respirators Factsheet
- Voluntary vs Required Respirator Use Factsheet

Respirator Information

- MIOSHA Part 451 Respiratory Protection Key Program Elements
  - NIOSH Certified Respirators
  - Written Program – MIOSHA Sample Program
  - Medical Evaluation
  - Fit Testing
- Voluntary use respirators require a respiratory protection program
  - The respirator worn will prescribe which program elements are required for voluntary use
  - Use resources to evaluate program requirements - OSHA Small Entity Compliance Guide to Respiratory Protection
- Stay updated to temporary enforcement guidance given by OSHA Enforcement Memos for COVID-19

Employee Training

- Employer **shall** provide:
  - Training to employees on SARS-CoV-2 and COVID-19
  - Communication and training on COVID-19 infection control practices in the primary languages common in the employee population
  - Updated training if:
    - There are changes to its COVID-19 preparedness & response plan OR
    - New information becomes available about the transmission of SARS- CoV-2
- Training **shall** cover:
  - Workplace infection control practices
  - Proper use of PPE
  - Step employees must follow to employer of COVID-19 symptoms or a suspected or confirmed case of COVID-19
  - How to report unsafe working conditions

Recordkeeping

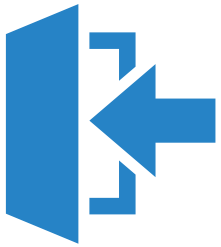
- Employers **must** maintain a record of the following:
  - Training; maintain all COVID-19 employee training
  - Screening Protocols; maintain a record of screening for each employee or visitor entering the workplace
  - Records of Required Notifications; maintain record of notifications associated to confirmed cases of COVID-19 in the workplace (see Rule 6 for health surveillance)
- Employers **must** maintain records for one year from time of generation

MIOSHA Emergency Rules for COVID-19

ADDITIONAL REQUIREMENTS FOR MANUFACTURING

Entering the Facility

- Manufacturing facilities must:



Create dedicated entry point(s) for daily screening

Use barriers and signs to direct individuals to designated entry point

Do not allow anyone to bypass designated entry point

Material Delivery

- Manufacturing Facilities **must**:
  - Create protocols for minimizing personal contact upon delivery of materials to the worksite

COVID-19 Resources

Manufacturing Industry Resources

- OSHA – COIVD19 Guidance for the Manufacturing Industry
- CDC/OSHA – Interim Guidance for Manufacturing Workers & Employers
- AIHA – Returning to Work: Small Manufacturing, Repair & Maintenance Shops

State of Michigan

- Coronavirus
- Emergency Epidemic Orders
- Michigan Coronavirus Resources
- Michigan Safe Start Map

MIOSHA

- COVID-19 Interim Enforcement Plan
- Workplace Safety Guidance for COVID-19
- Sample COVID-19 Preparedness & Response Plan

OSHA

- COVID-19 Information
- Guidance on Preparing Workplaces for COVID-19
- Enforcement Memos for COVID-19
- Interim Guidance for Specific Industries

CDC

- Coronavirus Disease (COVID-19)
- Guidance for Businesses & Workplaces
- Return to Work Guidance for Individuals with COVID-19 Not in Healthcare
- Guidance for Cleaning & Disinfecting
- General Business FAQs
- Healthcare Workers FAQs

Other

- AIHA – Back to Work Safety Industry Specific Recommendations

MIOSHA Resources

- MIOSHA Webpage
- MIOSHA Consultation, Education & Training (CET) Division
- MIOSHA Standards
- Request for Consultative Assistance
- PPE Guide for General Industry (SP #16)
- Respiratory Protection Program – Sample Written Program (SP #05)
- Hazard Communication Program – Sample Written Program (CET 5530)
- MIOSHA Training Program

MIOSHA
Michigan Occupational Safety and Health Administration

Contact MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)

530 W. Allegan Street, P.O. Box 30643

Lansing, Michigan 48909-8143

If you need further information regarding COVID-19

Call 855-SAFEC19 (855-723-3219).

To request consultation, education and training services, call 517-284-7720

or visit our website at:

www.michigan.gov/miosha

MICHIGAN DEPARTMENT OF
LABOR & ECONOMIC
OPPORTUNITY

MIOSHA
Michigan Occupational Safety
and Health Administration