

The background of the top half of the page is a high-angle photograph of a construction site. Two men are standing on a dirt surface. The man on the left is wearing a yellow hard hat, an orange safety vest over a red shirt, and orange gloves. He is pointing his right hand towards the ground. The man on the right is wearing a blue hard hat and a grey suit. He is holding a large roll of white paper, likely blueprints. In the background, there are some concrete blocks and metal rods.

BEST PRACTICES OSHA AND COVID-19

IS COVID-19 A RECORDABLE ILLNESS FOR PURPOSES OF OSHA LOGS?

OSHA recordkeeping requirements at 29 CFR Part 1904 mandate covered employers record certain work-related injuries and illnesses on their OSHA 300 log.

COVID-19 can be a recordable illness if a worker contracts the virus while on the job. ***The illness is not recordable if the worker was exposed to the virus while off the clock.*** Essentially, employers are only responsible for recording cases of COVID-19 if **ALL** the following are met:

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).

Visit OSHA's Injury and Illness Recordkeeping and Reporting Requirements page, or contact your **IMA Risk Control Advisor** for more information.



FOLLOW EXISTING OSHA STANDARDS

Existing OSHA standards may apply to protecting workers from exposure to and infection with SARS-CoV-2.

While there is no specific OSHA standard covering SARSCoV-2 exposure, some OSHA requirements may 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), which require using gloves, eye and face protection, and respiratory protection.
- When respirators are necessary to protect workers or where employers require respirator use, employers must implement a comprehensive respiratory protection program in accordance with the Respiratory Protection standard (29 CFR 1910.134). See: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>
- 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." See: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030>

For more information on OSHA requirements and COVID-19, refer to OSHA's Guidance on Preparing Workplaces for COVID-19 at <https://www.osha.gov/Publications/OSHA3990.pdf>



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