




**COVID-19**

UPDATE:  
July 29, 2020

**Coronavirus / COVID-19  
Response Team**


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**MIOSHA & COVID-19  
Safety Series: Part 3**

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## Today's Topics

- MIOSHA Webinar Series
- Remaining MIOSHA Standards
  - PPE
  - Respiratory Protection
  - Sanitation
  - Hazard Communication

## MIOSHA Webinar Series Topics

- Webinar #1: July 14, 2020
  - MIOSHA Enforcement and the General Duty Clause
- Webinar #2: July 23, 2020
  - The 3 R's: Reporting, Recording, and Records
- Webinar #3: **TODAY**
  - Preventing the Spread: MIOSHA *Standards* applicable to the COVID-19 pandemic

## General Industry Safety and Health Standard Part 33: Personal Protective Equipment

## PPE Program

- Hazard Assessment
- Training
  - When it is necessary
  - What kind is necessary
  - How to properly don, doff, adjust, wear
  - Limitations
  - Proper care, maintenance, useful life, disposal
- Responsibilities:
  - Employer: Cannot provide damaged or defective PPE
  - Employee: Use all PPE provided by employer

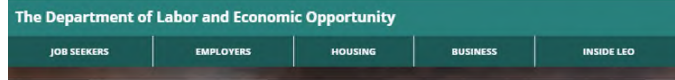
## PPE: COVID-19

- OSHA: Interim guidance for specific worker groups

Well patients		Patients with suspected or confirmed COVID-19	
<i>Dental procedures not involving aerosol-generating procedures</i>	<i>Dental procedures that may or are known to generate aerosols</i>	<i>Dental procedures not involving aerosol-generating procedures</i>	<i>Dental procedures that may or are known to generate aerosols</i>
<ul style="list-style-type: none"> <li>■ Work clothing, such as scrubs, lab coat, and/or smock, or a gown</li> <li>■ Gloves</li> <li>■ Eye protection (e.g., goggles, face shield)</li> <li>■ Face mask (e.g., surgical mask)</li> </ul>	<ul style="list-style-type: none"> <li>■ Gloves</li> <li>■ Gown</li> <li>■ Eye protection (e.g., goggles, face shield)</li> <li>■ NIOSH-certified, disposable N95 filtering facepiece respirator or better*</li> </ul>	<ul style="list-style-type: none"> <li>■ Gloves</li> <li>■ Gown</li> <li>■ Eye protection (e.g., goggles, face shield)</li> <li>■ NIOSH-certified, disposable N95 filtering facepiece respirator or better*</li> </ul>	<ul style="list-style-type: none"> <li>■ Gloves</li> <li>■ Gown</li> <li>■ Eye protection (e.g., goggles, face shield)</li> <li>■ NIOSH-certified, disposable N95 filtering facepiece respirator or better*</li> </ul>

## Resources for purchasing PPE

- MIOSHA Workplace Safety page



### WHERE CAN MY BUSINESS PURCHASE PPE



Are you in need of Personal Protection Equipment (PPE) including face masks, face shields, gloves and goggles as your business transitions to in-person operations over the coming weeks? Pure Michigan Business Connect is offering a procurement program to assist businesses in accessing non-medical grade Personal Protection Equipment (PPE) to keep their employees and customers safe as they begin resuming in-person operations, as is required by Executive Order 2020-97.

[GET STARTED](#)



## General Industry Safety Standard Part 451: Respiratory Protection

COVID-19  
**FACEMASKS VS. RESPIRATORS**

	<b>Cloth or Paper Face Mask</b>	<b>Surgical Face Mask</b>	<b>Filtering Facepiece Respirator (i.e. N95)</b>
<b>Testing &amp; Approval</b>	Not tested or approved, but recommended by the Centers for Disease Control and Prevention (CDC)	Cleared by the U.S. Food and Drug Administration per 21 CFR 878.4040	Evaluated, tested and approved by National Institute of Occupational Safety & Health (NIOSH) per <a href="#">42 CFR Part 84</a>
<b>Intended Use &amp; Purpose</b>	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.	Protects the wearer from small particle aerosols and large droplets.
<b>Who Should Wear?</b>	Everyone in public settings where social distancing is infeasible e.g. grocery store or pharmacy	Healthcare workers when N95 respirators are not available and patients who are suspected or confirmed to have COVID-19	Workers providing care or in prolonged proximity to suspected or confirmed COVID-19 cases
<b>Face Seal Fit</b>	Loose-Fitting	Loose-Fitting	Tight-Fitting
<b>Fit Test Required?</b>	No*	No*	Yes**
<b>User Seal Check Required?</b>	No	No	Yes, each time the respirator is put on
<b>Filtration</b>	Not classified as a filtering face-piece respirator to protect against inhaling smaller airborne particles.	Not classified as a filtering face-piece respirator to protect against inhaling smaller airborne particles	Filters ~95% of small airborne particles
<b>Leakage</b>	Leakage occurs around the edge of the mask when user inhales	Leakage occurs around the edge of the mask when user inhales	When properly fitted, minimal leakage occurs around edges of the respirator when user inhales
<b>Use Limitations</b>	Reusable. Launder routinely. Discard if mask becomes damaged.	Not designed for reuse. Discard after each patient encounter.	Ideally discarded after each prolonged encounter with a suspected or confirmed COVID-19 case; limited reuse acceptable under certain conditions.

\*Fit tests are not required for loose-fitting facepieces. \*\*Fit testing is required to wear an N95. Additional information regarding fit testing during the COVID-19 outbreak can be found under the [March 14, 2020 memo](#) and the [April 8, 2020 memo](#).

## Respiratory Protection

- Written respiratory protection program:
  - Procedures for selecting respirators for the workplace
  - Medical evaluations of employees required to use respirators
  - Fit testing procedures for tight-fitting respirators
  - Procedures for proper use
  - Procedures for cleaning, disinfecting, storing, inspecting, repairing, discarding, and maintenance
  - Procedures to ensure adequate air quality, quantity, and flow of breathing air
  - Training
  - Procedure for regular evaluation of effectiveness of respiratory protection program

## Required v. Voluntary

- As long as the employer determines that a respirator will not itself create a hazard, employer can permit employees to voluntarily use respirators
- MUST provide respirator users with information contained in the Standard's Appendix D
  - Employee responsible to understand, and follow, manufacturers recommendations on use, maintenance, cleaning and care, and warnings re: limitations

## Respirators: COVID-19

- Enforcement Guidance:  
[https://www.osha.gov/SLTC/covid-19/news\\_updates.html](https://www.osha.gov/SLTC/covid-19/news_updates.html)
  - Decontamination of Filtering Facepiece Respirators in Healthcare
  - Discretion in Enforcement when Considering an Employer's Good Faith Efforts during COVID-19
  - Temporary Enforcement Guidance on Respiratory Protection Fit-Testing for N95 Filtering Facepieces in All Industries
  - Respiratory Protection Equip. Certified Under Standards of Other Countries
  - Respiratory Protection and the N95 Shortage

## General Industry Safety and Health Standard, Part 474: Sanitation

### Sanitation: Generally

- Water supply
- Toilet facilities
- Washing facilities
- Change rooms
- Clothes drying facilities
- Consumption of food/beverage on premises
- Food handling



## General Cleaning

- Continue routine cleaning and other housekeeping practices
- Clean and disinfect potentially contaminated environments: EPA-registered disinfectants
- Workers who conduct cleaning tasks must be protected from exposures (PPE, Hazard Communication)

## General Cleaning: CDC

- <https://www.cdc.gov/coronavirus/2019-nCoV/community/reopen-guidance.html>
  - Develop your plan
  - Implement your plan
  - Maintain and revise your plan
- Handwashing

## General Industry Safety Standard Part 92: Hazard Communication

### Hazard Communication

- Requirements to ensure that the hazards of all chemicals are evaluated and information related to those hazards is provided to affected employees
- Written hazard communications program
  - Labels,
  - Safety data sheets
  - Employee training

## Final thoughts . . .

- Michigan COVID-19 Safety Grant Program
  - [https://www.michigan.gov/documents/leo/MI-COVID\\_Safety\\_Grant\\_696403\\_7.pdf?utm\\_medium=email&utm\\_source=govdelivery](https://www.michigan.gov/documents/leo/MI-COVID_Safety_Grant_696403_7.pdf?utm_medium=email&utm_source=govdelivery)
- Watch for developing standards
  - Ex) Virginia recently adopted the nation's first COVID-19 Workplace Safety Mandate
- Increased enforcement action
  - Ohio: Respiratory Protection Standards



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## Back to Work Resource Center

<https://resources.millerjohnson.com/>

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Resource Center

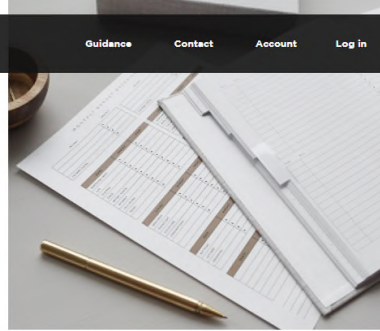
Guidance Contact Account Log in

Our **Back to Work Resource Center** provides a single source option for employers who are wrestling with the legal and practical consequences of a changed world.

For less than the cost of a typical handbook update, you gain access to an extensive collection of resources and Miller Johnson work product that we are confident will provide meaningful support to your efforts to navigate waters that are not only choppy but continuously changing direction.

Here is a sampling of what subscribers will find:

- Forms, Plans and Policies - we have drafted templates for you to put into service immediately
- Practical Guidance - tools to effectively, safely and confidently return to work incorporating best practices from outside organizations, including community partners such as Spectrum Health
- Industry Specific Guidance - pages devoted to industries singled



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