

STEPS A HOME-BASED CARE PROVIDER SHOULD TAKE TO COMPLY WITH THE OSHA COVID-19 EMERGENCY TEMPORARY STANDARD (ETS) (29 C.F.R. §§ 1910.502, *et seq.*)

What a law firm should be. SM

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1. Develop a COVID-19 Plan
 1. The Plan must be written if you have more than 10 employees
 2. Seek the input and involvement of non-managerial employees and their representatives, if any, in development and implementation of the Plan
2. Designate one or more Safety Coordinators to implement and monitor the COVID-19 Plan (they should be knowledgeable in infection control principles and practices as they apply to the workplace)
3. Conduct a workplace-specific hazard assessment (you must seek the input and involvement of non-managerial employees and their representatives, if any, in this process)
4. Monitor the workplace to ensure ongoing effectiveness of the COVID-19 Plan (update as needed)
5. Implement a patient/client screening process
6. Implement policies to adhere to Standard and Transmission-Based Precautions
7. Make appropriate PPE available to employees
8. Implement protocols if performing aerosol-generating procedures on persons suspected or confirmed to have COVID-19
9. Encourage physical distancing when and where possible
10. Install physical barriers where feasible in areas outside patient/client care areas
11. Implement cleaning and disinfecting protocols
12. If you own or control the building, maximize ventilation
13. Implement an employee screening process
14. Develop template notification documents for exposed employees and other employers whose employees also may have been exposed at the same time as yours
15. Implement medical removal protocols
 1. Determine who and when to test employees for COVID-19
 2. Determine when you will provide medical removal protection benefits (medical removal benefits are not required for employers with 10 or fewer employees)
 3. Determine when you will allow employees to return to work
16. Encourage employees to become vaccinated (you should also be mindful of any state or municipal regulations governing this issue)

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17. Train employees in the areas required by the ETS
18. Maintain a culture that does not tolerate retaliation
19. Follow all ETS recordkeeping requirements
20. Establish and maintain a COVID-19 log to record each instance an employee is COVID-19 positive (does not matter if the exposure was work-related)
21. Create a process to report any COVID-19 related in-patient hospitalization or death to OSHA
22. Communicate your plan to any other employers that share the same physical location
23. Implement a mini-respiratory protection program (29 C.F.R. § 1910.504) for employees who would like to wear respirators in situations where a respirator is not required
24. If you care for COVID-19 patients or clients (including those who are suspected to have or are under quarantine due to an exposure), implement a respiratory protection program (29 C.F.R. § 1910.134)