

Practice Resource Update

OSHA COVID-19 Emergency Temporary Standards for Healthcare Settings: Released June 21, 2021

OSHA released the COVID-19 Emergency Temporary Standards (ETS) for healthcare settings that were required to go into effect immediately. The full ETS rules can be found at:
<https://www.osha.gov/coronavirus/ets>

**The use of this resource document does not guarantee compliance with the OSHA COVID-19 Emergency Temporary Standards but is meant to be a tool for dental offices to navigate these guidelines. It is the responsibility of the Supervising Dentist or Owner to ensure that the OSHA COVID-19 Emergency Temporary Standards are correctly developed and meet Federal OSHA standards.

The following are required as a part of the OSHA COVID-19 ETS Rule:

1. Written COVID-19 plan
 - a. Template (fillable word document): https://www.osha.gov/sites/default/files/COVID-19_Healthcare_ETS_Model_Written_Plan.docx
 - b. Identified COVID-19 Safety Coordinator responsible for:
 - i. Compliance
 - ii. Workplace specific hazard assessment:
https://www.osha.gov/sites/default/files/COVID-19_Healthcare_ETS_Worksite_Checklist_Employee_Job_Hazard_Analysis.pdf
 - iii. Plan development and implementation
 - iv. Policies and procedures meant to minimize risk of COVID-19 transmission to employees
2. Patient screening and management strategies
 - a. Limit and monitor points of entry where patient care is conducted
 - b. Screen and triage patients and visitors for signs and symptoms of COVID-19
3. Adhere to CDC Standard and Transmission Based Precautions based on patient status
 - a. Standard Precautions: <https://www.cdc.gov/infectioncontrol/basics/standard-precautions.html>
 - b. Transmission Based Precautions:
<https://www.cdc.gov/infectioncontrol/basics/transmission-based-precautions.html>
4. PPE management
 - a. Provide appropriate PPE to employees for patient care
 - b. Provide NIOSH approved N95 respirators to employees with exposure to people with suspected or confirmed COVID-19
 - c. Provide NIOSH approved N95 respirators for employees involved in Aerosol Generating Procedures (AGPs)
 - d. Refer to the OSHA PPE guidance for dental settings that can be found at
<https://www.osha.gov/coronavirus/control-prevention/dentistry>
5. AGP management

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- a. Limit employees that are present to only those that are essential during AGPs
- b. If a patient is COVID-19 confirmed, treatment should take place in an airborne infection isolation room
6. Physical distancing
 - a. Maintain at least 6 feet of distance between people when they are indoors
7. Physical Barriers
 - a. Install cleanable or disposable solid barriers at non-patient care work locations where employees cannot maintain a distance of at least 6 feet (ex: reception)
8. Cleaning and Disinfection
 - a. Follow standard cleaning and disinfection processes in accordance with CDC guidance
 - i. CDC Cleaning and Disinfection:
<https://www.cdc.gov/infectioncontrol/guidelines/disinfection/index.html>
 - ii. Includes patient care areas, medical and dental devices
 - iii. Clean high touch surfaces at least once per day with an approved disinfectant
 - b. Provide Alcohol Based Hand Rub (ABHR) that is at least 60% alcohol
9. Ventilation
 - a. Review facility HVAC system to ensure that it is being appropriately used according to manufacturers Instructions For Use (IFU)
 - b. Ensure air filters have a Minimum Efficiency Reporting Value (MERV) of 13 or above if the IFUs allow
10. Employee Screening
 - a. Screen employees for COVID-19 signs/ symptoms before each shift
 - b. Require employees to report signs/ symptoms and pending or positive COVID-19 tests
 - c. Notify exposed employees within 24 hours of coming into contact with someone that was positive for COVID-19 in the workplace:
<https://www.osha.gov/sites/default/files/publications/OSHA4131.pdf>
 - d. Employers with more than 10 employees: provide medical removal protection benefits for employees who must isolate or quarantine:
<https://www.osha.gov/sites/default/files/COVID-19%20Healthcare%20ETS%20Notification%20Removal%20and%20Return%20to%20Work%20Flow%20Chart%20-%20Worker.pdf>
11. Vaccination
 - a. Employers must provide reasonable time and paid leave for vaccination and vaccine side effects
12. Training
 - a. Employers must ensure that all employees receive training on:
 - i. COVID-19 transmission
 - ii. Tasks that could result in transmission and infection
 - iii. Relevant policies and procedures related to COVID-19
 - iv. OSHA Employee Training Presentation:
<https://www.osha.gov/sites/default/files/COVID-19%20Healthcare%20ETS%20502%20Employee%20Training.pptx>
13. Anti-Retaliation
 - a. Employers cannot discharge or discriminate any employees for engaging in actions required by the OSHA ETS Rule
14. Recordkeeping
 - a. If more than 10 employees, establish a log of all employee cases of COVID-19 without regard to occupational exposure

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- b. Sample COVID-19 Log:
<https://www.osha.gov/sites/default/files/publications/OSHA4130.pdf>
- 15. All requirements must be implemented at no cost to the employees
- 16. All work related COVID-19 fatalities and in-patient hospitalizations of employees to OSHA
 - a. Information on reporting:
<https://www.osha.gov/sites/default/files/publications/OSHA4129.pdf>

OSHA ETS Mini Respiratory Protection Plan

The release of the OSHA ETS Rule includes the possibility of a Mini Respiratory Protection plan. The Mini Respiratory Protection Plan does not replace the need for a full Respiratory Protection Plan when the employee is assigned to high risk situations that are identified in your risk assessment.

Mini Respiratory Protection Plan Fact Sheet:

<https://www.osha.gov/sites/default/files/publications/OSHA4121.pdf>

Table 2. Applicability of the mini respiratory protection program vs. the Respiratory Protection standard

COVID-19 ETS PROVISION	MINI RPP (1910.504)	NORMAL RPP (1910.134)
1910.502(f)(2) – for exposure to person with suspected/confirmed COVID-19		✓
1910.502(f)(3) – for AGP ¹ on person with suspected/confirmed COVID-19		✓
1910.502(f)(4) – in place of facemask when respirator is not required	✓	
1910.502(f)(5) – for Standard and Transmission-Based Precautions		✓

¹ AGP = aerosol-generating procedure (as defined by 1910.502)

The Mini Respiratory Protection Plan is meant to specifically address the following:

1. Provide training on how to don, doff, conduct a user seal check and inspect a respirator
 - a. Mini Respiratory protection plan employee training:
<https://www.osha.gov/sites/default/files/COVID-19%20Healthcare%20ETS%20504%20Employee%20Training.pptx>
2. Ensure that employees are conducting user seal checks properly and correct any problems discovered during a user seal check