



Are You OSHA Covid-19 Compliant?

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Agenda

- OSHA National Emphasis Program (NEP) – Coronavirus Disease
- OSHA Compliant Respiratory Protection Program
- Recent OSHA Activity In Healthcare
- Recording Covid-19 Cases on the OSHA 300 Log
- OSHA Recordkeeping & Reporting Overview

OSHA National Emphasis Program (NEP) – Coronavirus Disease

- On March 12th, 2021 OSHA announced the NEP on coronavirus disease
- NEP is focused on protection of high-risk workers from Covid-19
- Targeted industries include healthcare, manufacturing, warehousing, construction, and other select industries.
- The NEP will also include follow-up visits of worksites inspected in 2021.

6 Required Components of a Respiratory Protection Program

1. A procedure for selecting respirators for use in the workplace
2. Medical evaluations for all users of respirators
3. Initial and annual fit-testing for all users of tight-fitting respirators
4. A procedure for proper use of respiratory protection
5. Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators
6. Annual training for all users of respirators

Recent OSHA Activity In Healthcare

HR & SAFETY 01.12.21

OSHA Levies \$3.9M in COVID-19 Workplace Fines

1. Respiratory Protection Program (~\$13,000 per citation)

- Written Program
- Medical Clearance For N95 Use
- Fit Testing
- Training
- Use Of Non-Approved KN95

2. Severe Injury Reporting (~\$9,000 per citation)

- Failure to report to OSHA following the hospitalization of an employee
- Failure to report to OSHA following an employee fatality

Recent OSHA Activity In Healthcare

HR & SAFETY 01.12.21

OSHA Levies \$3.9M in COVID-19 Workplace Fines

3. **OSHA Recordkeeping (~5,000 per citation)**
 - Failure to report incident on OSHA 300 log
4. **Hazard Communication (~\$7,000 per citation)**
 - Lack of written program
 - Lack of safety data sheets
 - Lack of training
5. **Personal Protective Equipment Assessment**
 - Lack of task specific PPE assessment
6. **General Duty Clause (5A)**
 - “Must provide a safe work environment for employees”
 - Used for violence in the workplace (including combative resident injuries)
 - Used for resident handling and transfer injuries

OSHA's Recordkeeping Criteria for Covid-19

1. The case is a confirmed case of COVID-19.
2. The case is work-related as defined by the recordkeeping standard; and
3. The case involves one or more of the general recording criteria set forth in the recordkeeping standard

OSHA Recordkeeping & Reporting Overview

1. Recordkeeping Requirements

- How does OSHA define a recordable injury or illness?
- How does OSHA define first aid?

2. Maintaining and Posting Records

- Requirements for forms 300, 300A, and 301

3. Electronic Submission Of Records

- Submission of 300A via ITA Launch Page

4. Severe Injury Reporting

- Fatality, amputation, loss of eye, hospitalization

<https://www.osha.gov/recordkeeping>



Questions?



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