

An Overview of the New OSHA Requirement for a COVID-19 Prevention Program

By Mark Harrison, Certified Safety Training, an NFDA Endorsed Provider

On January 29, 2021, OSHA released [“Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace”](#) per President Biden’s Executive Order. NFDA Endorsed Provider Certified Safety Training has developed an overview of this Executive Order, outlining what your facility needs to do to be in compliance. All employers are required to have a [COVID-19 Prevention Program](#) in place.

The average OSHA fine for a funeral home is \$7,000 and OSHA will be looking for COVID-19 Prevention Programs in addition to standard mandatory funeral home safety programs.

Here is an overview of the OSHA requirements for a COVID-19 Prevention Program:

- Identify a COVID-19 workplace coordinator.
- Perform a thorough hazard assessment focusing on identifying COVID-19 potential high exposure areas (e.g., specific shared amenities and customer interaction areas).
- Conduct education and training.
- Determine control measures that will minimize the spread of the virus such as barriers and ventilation.
- Conduct cleaning and disinfection if someone has a suspected or confirmed case of COVID-19.
- Isolate any employees who are showing COVID-19 symptoms at work.
- Provide guidance on screening and testing.
- Record and report COVID-19 infections or deaths (related to work).
- Provide the COVID-19 vaccine without cost to employees (when available) and continue using protective measures even with vaccinated employees.
- Communicate COVID-19-related policies and procedures to English- and non-English speaking employees.
- Implement protections from retaliation for employees that bring up COVID-19-related concerns.
- Implement policies that don’t punish employee absences and encourage workers to stay home if they might have been infected with the virus.
- Implement policies and procedures for employees who are possibly infected or are infected with COVID to stay home, minimize the impact of quarantine/isolation with telework and flexible paid leave.

Additional OSHA’s Guidance on working from home, physical/social distancing, using surgical masks or cloth face coverings, Personal Protective Equipment (PPE), ventilation, and cleaning and hygiene protocols.

- **Face Coverings or Masks.** Employers should provide all workers with face coverings or surgical masks unless the employee’s job tasks require a respirator.
- Face coverings should use two layers of material and not use exhalation valves or vents.
- If the face coverings are easily soiled or could become wet, employers must provide daily or frequent replacements.
- In operations with deaf workers, employers should try to offer face coverings that provide a clear covering over the mouth.

- Quarantines. In addition to the previous quarantine guidance from OSHA, the agency advises that employees who have come into direct physical contact with someone who has COVID-19, shared eating or drinking with them, or somehow got any respiratory droplets on them (e.g., from sneezing or coughing), should also quarantine.

Improving Ventilation

- Ensure ventilation systems operate properly and provide acceptable indoor air quality for each space's current occupancy level.
- Increase ventilation rates wherever possible.
- Increase outdoor air with open windows and doors, when weather allows and it doesn't pose a safety or health risk (e.g., triggering asthma).
- Decrease or stop recirculation by opening minimum outdoor air dampers. Taking this action won't affect thermal comfort or humidity in milder weather although could be hard to do in cold or hot weather.
- Check filters for service life and proper installation.
- Run systems longer, 24/7 where possible, to improve air exchanges in the area.
- Make sure restroom exhaust fans are functioning properly and operating at full capacity.
- Implement portable high-efficiency particulate air (HEPA) fan/filtration systems to improve air cleaning.
- If ventilation can't be increased and to ensure an effective level of dilution ventilation, decrease the occupancy level in the building.

If you are interested in purchasing a [Customized COVID-19 Prevention Program](#), which includes a written plan and online training, you may do so from NFDA Endorsed Provider partner, [Certified Safety Training](#).

Additional Resources

- [Protecting Worker Health and Safety Executive Order](#)
- [Department of Labor Issues Stronger Workplace Guidance on Coronavirus Press Release](#)
- [Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace](#)
- NFDA OSHA Safety Program, powered by Certified Safety Training
 - Exclusive services for members, www.nfda.org/endorsedproviders
 - Services for all funeral service professionals, www.nfda.org/osha

Mark Harrison is a Partner at [Certified Safety Training](#), a leader in the field of regulatory compliance providing [OSHA services in the deathcare industry](#). He can be contacted at the [NFDA Member OSHA Hotline](#), or by email, markharrison@certifiedsafetytraining.org.