

The Occupational Safety and Health Administration (OSHA) developed COVID-19 guidance based on traditional infection prevention and industrial hygiene practices. While it's important that practices continue to follow required OSHA standards, this specific guidance focuses on the need for practices to implement engineering, administrative, and work practice controls and personal protective equipment (PPE) for the COVID-19 pandemic. *Note, this guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist practices in providing a safe and healthful workplace.* The details are outlined below.

RECOGNIZING SIGNS AND SYMPTOMS

Infection with SARS-CoV-2, the virus that causes COVID-19, can cause illness ranging from mild to severe that may appear in as few as 2 days or as long as 14 days after exposure. Symptoms typically include:

- Fever,
- cough, and
- shortness of breath.

There have been reports of infected individuals experiencing other non-respiratory symptoms. Further, there are asymptomatic cases, who experience no symptoms at all. And in some instances, the illness can be fatal.

EFFECTS ON THE WORKPLACE

COVID-19 can cause many disruptions including:

- Increase in employee absences due to personal illness; serving as a caregiver for sick family members; having to care for children — under the age of 18 — that are out of schools or day care centers; live with at-risk people including those that are immunocompromised; or are anxious to report to work because of fear exposure.
- Disruptions in supplies and delivery due to high demand, low supplies, and supplies coming from geographic areas severely affected by COVID-19 shipment may be delayed or cancelled with or without notification.

DEVELOPING AN INFECTIOUS DISEASE PREPAREDNESS AND RESPONSE PLAN

If your practice doesn't already have one, develop an infectious disease preparedness and response plan. Keeping abreast of federal, state, and local level guidance, the following should be considered when developing the plan:

- Where, how, and what sources of COVID-19 exposure might exist including the general public, sick individuals or those considered high-risk, non-occupational risk factors at home and in community settings, individual employee risk factors, and controls necessary to address the identified risks.
- Contingency plans in case of outbreaks that increase employee absenteeism, require physical distancing, staggering worker hours, cross-training staff, scaling down or halting non-emergent day-to-day operations, moving to tele-medicine options, addressing interrupted supply chains or delivery delays or other measures to reduce exposure.

For more information, contact the Academy's Practice Management Center:

WEBSITE: aad.org/practicecenter

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IMPLEMENTING BASIC INFECTION PREVENTION MEASURES

Basic infection prevention measures are likely already in place for dermatology practices, but it is important to emphasize these measures during this pandemic including:

- Promoting frequent and thorough handwashing
- Urge employees to stay home if they are sick
- Promote covering coughs and sneezes for both employees and general public
- Increase availability and use of tissues and trash cans
- *If appropriate*, establish flexible work sites (such as teleworking) and hours to increase physician distancing
- Maintaining and/or increasing routine cleanings and disinfecting of common surfaces and equipment using cleaning products that are EPA-approved

DEVELOPING POLICIES AND PROCEDURES FOR IDENTIFICATION AND ISOLATION OF SICK INDIVIDUALS

One of the best ways to reduce the spread of an infectious disease such as COVID-19 is to promptly identify and isolate potentially infectious individuals. To do so:

- Encourage employees to self-monitor for signs and symptoms
- Develop policies and procedures for employees to report illness or if experiencing symptoms of COVID-19
- Develop policies and procedures and train staff to implement them to immediately isolate employees who are ill or experiencing symptoms of COVID-19
 - If possible, separately isolate those with confirmed cases of COVID-19 from those who are suspected and limit the number of personnel accessing the isolation area(s)
- Provide face masks — not medical personal protective equipment (PPE) — when needed to limit spread of respiratory secretions
- Provide administrative controls, work safeguards, and PPE for those that will be in close contact with and have prolonged or repeated contact with those that are ill

DEVELOPING, IMPLEMENTING, AND COMMUNICATING WORKPLACE FLEXIBILITIES AND PROTECTIONS

- Encourage sick employees to stay home ensuring the practice's sick leave policies are flexible and consistent with public health guidance and that employees are aware
- Do not require a physician's note for sick employees to return to work since physicians may not be able to do so during this unprecedented time
- Allow employees to take time off to care for sick family members or children that are out of school or daycare
- Be prepared to provide employees guidance when concerns are raised about pay, leave, safety, health, medical care, or other related issues due to the pandemic

IMPLEMENTING WORKPLACE CONTROLS

During this pandemic it may not be possible to eliminate the hazard therefore the most effective protection measures — from most effective to least effective — should be employed when appropriate. These measures include engineering controls, administrative controls (such as safe work practices), and PPE. Typically, a combination of these measures will help reduce exposure and protect employees.

- Engineering controls include:
 - Increasing ventilation and installing high-efficiency air filters
 - Installing physical barriers such as clear sneeze guards
- Administrative controls include those noted above such as encouraging sick workers to stay home as well as:
 - Minimizing face-to-face interactions and shifting to a virtual work environment
 - Discontinuing non-essential travel

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- Training employees about the latest information on COVID-19
- Safe work practice controls are noted above including hand washing and use of PPE when appropriate.
- PPE controls include:
 - Providing employees proper gloves, goggles, face shields, face masks, and respiratory protection, when appropriate
 - Selecting PPE based on level of hazard/exposure (lower risk/caution, medium, high, and very high)
 - Details on the various levels of hazard can be found here:
<https://www.osha.gov/Publications/OSHA3990.pdf>
 - Ensuring proper fitting and re-fitting of equipment
 - Training and implementation of proper removal, cleaning, storage, and disposal of PPE

Information regarding the pandemic is changing constantly so be sure to visit the OSHA website for the most current guidance at www.osha.gov.

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