

Oregon OSHA Temporary Rule Addressing COVID-19 Workplace Risks Exposure Risk Assessment and Infection Control Plan

Oregon OSHA's [437-001-0744 Temporary Rule Addressing COVID-19 Workplace Risks](#) require all employers to develop and implement an Exposure Risk Assessment and Infection Control Plan. Oregon State University (OSU) Exposure Risk Assessment and Infection Control Plan have been developed in accordance with Oregon OSHA temporary rule and are based on OSU's [COVID-19 Safety and Success](#) comprehensive planning that began January 2020. The development of the Exposure Risk Assessment and Infection Control Plan involved participation and feedback from the broader community stakeholders that helped to develop the [University Onsite Activity Resumption Plan](#). Feedback was achieved through an interactive process involving many stakeholders throughout the university including the following OSU committees, work groups, and departments.

- [COVID-19 Continuity Management Team](#)
- [University Health and Safety Committee](#)
- Environmental Health and Safety ([EH&S](#))
- [Human Resources](#)
- [Research](#)
- [Building Operations Resumption](#)
- [Facilities Services](#)

The Oregon OSHA temporary rule states that each employer with more than ten employees statewide must record their COVID-19 exposure risk assessment in writing. OSU's documentation of this is addressed in subsection (3)(g)(C) and shown on pages 2 through 8 in the 13 questions and answers section. If an employer has multiple facilities that are substantially similar, its assessment may be developed by facility type rather than site-by-site so long as any site-specific information that affects employee exposure risk to COVID-19 is included in the assessment. OSU's Exposure Risk Assessment was performed without regard to the use of personal protective equipment, masks, face coverings, or face shields.

The Infection Control Plan builds upon the exposure risk assessment and aims to eliminate or otherwise minimize worker exposure to COVID-19. The specific requirements for the COVID-19 infection control plan are outlined under subsection (3)(h) of the OSHA rule. The Infection Control Plan does not include the additional elements required for exceptional risk workplaces. OSU colleges, divisions, and departments with job assignments or worker tasks engaged in exceptional risk tasks require site specific Exposure Risk assessments and Infection Control Plans.

For questions and feedback concerning the Exposure Risk Assessment and Infection Control Plan, please contact Environmental Health and Safety ([EH&S](#)) at ehs@oregonstate.edu, 541-713-SAFE or you can [report a safety concern](#).

Exposure Risk Assessment

A summary of OSU’s answers to each of the applicable exposure risk assessment questions are listed in the table below. The risk assessment addresses questions related to potential employee exposure to COVID-19 in the workplace. Employees should provide feedback to their supervisors concerning exposure risk assessment concerns particular to their workplace.

The name(s), job title(s), and contact information of the person(s) who performed the exposure risk assessment	Tom Doyle, Director Environmental Health and Safety, Thomas.Doyle@oregonstate.edu Matt Philpott, Biological Safety Officer, Matthew.Philpott@oregonstate.edu
The date the exposure risk assessment was completed	December 7, 2020
The employee job classifications that were evaluated	Unclassified Personnel – Professional Faculty (academic and administration) Classified Personnel Student Employees

(3)(g)(C)	Questions	Answers
1	Can employees telework or otherwise work remotely? How are employees encouraged or empowered to use those distance work options to reduce COVID-19 transmission at the workplace?	<p>In accordance with the OSU University Onsite Activity Resumption Plan (page 9):</p> <ul style="list-style-type: none"> • OSU will request that most employees who can continue to effectively work remotely, continue to do so. • Given OSU’s commitment to a culture of care, the university will seek to provide employees the greatest level of flexibility in their workplace location and settings if they are uncomfortable with onsite activities. This flexibility will be dependent upon job duties and supervisor approval. • Employees at higher risk for severe illness from COVID-19, where possible, should remain working remotely until there is a vaccine or reliable treatment. (Where remote work is not possible, individuals with health conditions may request a reasonable accommodation from the Office of Equal Opportunity and Access.) <p>Not all OSU employees will have the ability to work from home given the requirements of their job responsibilities. In these cases, public health</p>

		measures, including having those who can work remotely do so, will promote a safer workplace.
2	What are the anticipated working distances between employees? How might those physical working distances change during non-routine work activities?	<ul style="list-style-type: none"> OSU employees, students and other members of the OSU community are required to maintain a distance of six (6) feet between individuals to the greatest extent possible in accordance with the Physical Distancing During COVID-19 Pandemic Policy. In complying with this policy, all members of the university community at all OSU locations are to configure spaces as needed, including classrooms, workplaces, university-managed living spaces and dining halls to provide for maximum physical distancing. OSU continues to make a low-density environment a priority within our campuses in Corvallis and Bend, and our centers and offices statewide. Adhering to a low-density presence contributes to the health and safety for those who are required to report to work onsite, as well as for faculty and students who are living, learning and conducting research in university environments.
3	What is the anticipated working distance between employees? How might those working distances change during non-routine work activities?	<ul style="list-style-type: none"> See answer # 2 above.
4	How have the workplaces or the job duties of the employees, or both, been modified to provide at least 6-feet of physical distancing between all individuals?	<ul style="list-style-type: none"> Low density environment as described in # 2 above has been implemented to provide for the 6-ft physical distancing requirement. Employees have been moved to alternative locations or workstations have been separated by at least 6 feet. Physical barriers (e.g., shields) have been installed where necessary. Physical distancing guidelines have been developed for laboratories. Maximum capacities have been assigned to rooms.
5	How are employees and other individuals at the workplace notified where and when masks, face coverings, or face shields are required? How is this policy enforced and clearly communicated to employees and other individuals?	<ul style="list-style-type: none"> Notification of OSU Face Covering in Public and Common Settings During Response to COVID-19 Pandemic Policy and updates are communicated to the entire university through email notifications and updated on COVID website. Additional notification, communication, information and training on face covering and face shields policy is provided to employees, supervisors and Building Managers through Human Resources COVID-19.

		Resources , Return to Onsite Work Readiness Checklist and Building Operations Resumption .
6	How have employees been informed about the workplace policy and procedures related to reporting COVID-19 signs and symptoms? How might employees who are identified for quarantining or isolation as a result of medical removal under this rule be provided with an opportunity to work at home, if such work is available and they are well enough to do so?	<ul style="list-style-type: none"> • Employees are informed through HR COVID-19 Resources which includes Positive Case Communication reporting instructions. • As employees return to work in collaboration with their supervisor, a checklist planning tool is provided. • Training and Information Forum is offered for employees returning to on-site work. • Employees can also utilize the OSU Health Check app to conduct a self-health assessment. • Per University Resumption plan, employees are to be afforded greatest level of flexibility in their workplace location and settings, dependent upon job duties and supervisor approval.
7	How have engineering controls such as ventilation (whether portable air filtration units equipped with HEPA filters, airborne infection isolation rooms, local exhaust ventilation, or general building HVAC systems) and physical barriers been used to minimize employee exposure to COVID19?	<ul style="list-style-type: none"> • Facilities Services has modified Campus Building Ventilation (HVAC) operations following the recommendations of the Centers for Disease Control and Prevention and the American Society of Heating Refrigeration and Air Conditioning Engineers. • Physical barriers (e.g., shields) are installed where necessary.
8	How have administrative controls (such as foot-traffic control) been used to minimize employee exposure to COVID19?	<ul style="list-style-type: none"> • Building Operations Resumption Team have worked with Building Managers to ensure proper administrative controls are in place in each building including signage and foot-traffic controls. • Designated entries and exits to direct foot-traffic are listed on the campus map.
9	What is the procedure or policy for employees to report workplace hazards related to COVID-19? How are these reporting procedures or policies communicated to employees?	<ul style="list-style-type: none"> • Employees can report workplace hazards related to COVID-19 by submitting an EH&S Report a Safety Concern or through the COVID-19 Questions or Concerns. • Reporting procedures are communicated through the EH&S and OSU COVID websites. • Resumption cleaning kits (disinfecting wipes, disinfectant, etc.) were distributed to each unit on campus. Additional supplies can be purchased via the OSU Benny Buy system.

10	How are sanitation measures related to COVID-19 implemented in the workplace? How have these sanitation practices been explained to employees and other individuals at the workplace?	<ul style="list-style-type: none"> • Building Operations Resumption has worked with Facilities Services and Building Managers to implement sanitation practices. • Facilities/buildings/common spaces guidance regarding sanitation is provided in University Onsite Activity Resumption Plan. • Per OSU's Communicable Disease Management Plan, supervisors are to ensure Facilities is informed in the event of a positive case in their unit so enhanced cleaning can take place.
11	How have industry-specific or activity-specific COVID-19 requirements in Appendix A of this rule and applicable guidance from the Oregon Health Authority been implemented for workers? How are periodic updates to such Oregon Health Authority guidance documents incorporated into the workplace on an on-going basis?	<ul style="list-style-type: none"> • Industry-specific public health guidance from the Oregon Health Authority is included in the University Onsite Activity Resumption Plan. • Updates are incorporated in the plan and communicated to the OSU community through email notifications and updated on COVID website. • Updates and ongoing training provided to Points of Contact (POC), OSU employees who facilitate communication to employees in the event of a positive case. The POC's have been updated on OSHA requirements so that they can effectively advise and support units where there are positive cases.
12	How are the requirements under this rule for physical distancing, wearing masks, face coverings or face shields, along with sanitation measures, communicated to and coordinated between all employers and their affected employees in settings where workers of multiple employees work in the same space and/or share equipment or common areas?	<ul style="list-style-type: none"> • Requirements are centrally communicated from the main Corvallis campus to all worksites throughout the state via email notifications and updates posted on COVID website. Coordination is implemented at the various worksites including: <ul style="list-style-type: none"> ○ OSU Extension resumption planning ○ OSU Cascades COVID-19 webpage ○ Hatfield Marine Science Center ○ OSU in Portland
13	How can the employer implement appropriate controls that provide layered protection from COVID-19 hazards and that minimize, to the degree possible, reliance on individual employee training and behavior for their efficacy?	<ul style="list-style-type: none"> • OSU has implemented appropriate controls that provide layered protection from COVID-19 hazards as described on the following web pages: <ul style="list-style-type: none"> ○ COVID-19 Safety and Success ○ Human Resources COVID-19 Resources ○ Building Operations Resumption ○ Environmental Health and Safety ○ Research Resumption Resources

Infection Control Plan

Oregon OSHA’s temporary rule for COVID-19 (OAR 437-001-0744) requires all employers to develop and implement an infection control plan. This plan builds upon each employer’s exposure risk assessment, which the rule also requires, and aims to eliminate or otherwise minimize worker exposure to COVID-19. The specific requirements for this COVID-19 infection control plan are outlined under subsection 437-001-0744(3)(h). This plan does not include the additional elements required for exceptional risk workplaces.

(3)(h)(B)	Elements	Answers
1	All OSU job assignments or worker tasks requiring the use of personal protective equipment (including respirators) necessary to minimize employee exposure to COVID-19.	All OSU job assignments and worker tasks require the use of face coverings in accordance with OSU Face Covering in Public and Common Settings During Response to COVID-19 Pandemic Policy . This policy requires the entire OSU community including faculty, staff, students, contractors, volunteers, and visitors across all OSU locations to use face coverings, which include masks, or cloth face coverings, when in enclosed public and common areas on campus and outdoor areas where physical distancing is not easily maintained. Face coverings must fully cover the nose and mouth. Face coverings that incorporate a valve to facilitate easy exhalation, mesh masks, lace masks, or other coverings with openings, holes, visible gaps in the design, material or vents are not in compliance with this policy.
2	The procedures OSU will use to ensure that there is an adequate supply of masks, face coverings, or face shields and personal protective equipment (including respirators) necessary to minimize employee exposure to COVID-19.	<ul style="list-style-type: none"> • Face coverings and other necessary personal protective equipment are provided to OSU employees free of charge. • Face coverings are available by contacting to order online at the OSU Resumption Store for initial distribution or carson.dunlap@oregonstate.edu for additional face coverings. • Respirators, gloves and other PPE are available through ChemStores at https://chemstores.chem.oregonstate.edu/ or 541-737-2271. • In response to the COVID-19 pandemic, OSU has taken many actions to support a healthier and safer environment for faculty and staff currently working on campus, including adopting enhanced cleaning methods. Everyone has a role to play in cleaning for our collective health. To assist departments in keeping their environments clean and sanitized, the Division of Finance and Administration is providing Resumption Startup Kits at no initial cost to OSU departments. The kits

		<p>provide items that will assist teams in resuming on-site operations, including:</p> <ul style="list-style-type: none"> ○ 16 oz hand sanitizer ○ 32 oz disinfectant spray in a refillable bottle ○ Disinfecting wipes ○ Disposable gloves ○ Paper towels ○ Public health posters ○ Painters tape (will not damage floors when used for marking for physical distancing) <p>A video walking through the ordering process is available here: https://media.oregonstate.edu/media/t/1_scoi555k</p> <p>In addition to the initial Resumption Startup Kit, OSU departments can order refills and additional cleaning supplies at discounted prices through the store's BennyBuy order form. By leveraging the university's collective buying power, we were able stand up a centralized Resumption Supply Store.</p> <p>Kits will be distributed by organization codes. Each kit supports five people, so divide the total number of people in your department by five to see how many kits you need. The Resumption Startup Kits are available to order now in BennyBuy by departmental budget authorities. Large orders may be delivered to the requesting department; a pickup will be arranged for fewer than 30 kits.</p> <p>Please contact the Operations Resumption Team if you have any questions.</p>
3	The specific hazard control measures that OSU installed, implemented, or developed to minimize employee exposure to COVID-19, listed and described.	<p>Specific OSU hazard control measures are listed below. Click on links for descriptions.</p> <ul style="list-style-type: none"> • COVID-19 Safety and Success Resources • Face Covering and Physical Distancing Policies • University Onsite Activity Resumption Plan • Resuming On-Site and Field-Based Research Activities • HR COVID-19 Resources • Environmental Health and Safety COVID-19 Resources • Building Operations Resumption

4	Description of OSU COVID-19 mask, face covering, and face shield requirements at the workplace, and the method of informing individuals entering the workplace where such source control is required.	See University Policy: 04-041 Face Covering in Public and Common Settings During Response to COVID-19 Pandemic.
5	The procedures OSU will use to communicate with our employees and other employers in multiemployer work sites regarding an employee's exposure to an individual known or suspected to be infected with COVID-19 to whom other workers may have been exposed. This includes the communication to individuals identified through COVID-19 contact tracing and general communication to the workplace at large.	<ul style="list-style-type: none"> • See OSU Communicable Disease Management Plan. • See positive case communication procedures on COVID-19 Safety & Success Resource webpage https://covid.oregonstate.edu/resources.
6	The procedures we will use to provide our workers with the initial employee information and training required by 437-001-0744. The procedures the employer will use to provide its workers with the initial employee information and training required by this rule.	<ul style="list-style-type: none"> • Before the adoption of the Oregon OSHA rule, OSU has been providing information and training to its employees addressing COVID-19 workplace risks. This information dates back to January 2020 before the pandemic began. Documentation of information and training provided is available on the OSU COVID-19 Information and Correspondence Document (Jen Humphrey preparing). • COVID-19 Information and Training available on the Environmental Health and Safety (EH&S) website https://ehs.oregonstate.edu/coronavirus.