

MEMORANDUM

To: Pastors, Pastoral Administrators, Principals, & Business Managers

From: Alana Wilson, Director of Human Resources

Re: OR-OSHA Temporary Rule Addressing COVID-19 Workplace Risks

Date: November 16, 2020

I am writing to provide information pertaining to the Oregon Occupational Safety and Health Agency (OR-OSHA) final “Temporary Rule Addressing COVID-19 Workplace Risks,” which became effective today, Nov. 16. The purpose of this rule is to reduce the risk of infection and spread of COVID-19. Please note that the following measures are ongoing and in effect until May 4, 2021.

Although this appears to be a voluminous amount of new information, the new ruling describes procedures many of you have in place. The Risk Management Office and the HR Office will provide additional information, support and training in advance of employer compliance deadlines.

A link to the complete temporary rule can be found on OR-OSHA’s website:
<https://osha.oregon.gov/OSHARules/div1/437-001-0744.pdf>.

Please take the time to review this new rule. Parishes with schools, please note that there are additional requirements specified in the Appendix. The physical distancing, face covering, and sanitation requirements included in the rule should be familiar as they largely mirror current Oregon Health Authority guidance. While some parts of the rule are immediately in effect for all employers, others have individual compliance effective dates and size specifications.

OR-OSHA has provided a helpful timeline to assist employers:

<https://osha.oregon.gov/rules/advisory/infectiousdisease/Documents/Overview-Table-for-Oregon-OSHA-COVID-19-Temporary-Rule.pdf>.

We wish to draw your attention to a few important, new requirements below:

- **Mandatory COVID-19 OR-OSHA Hazards Poster | Due by Nov. 16, 2020**
 - Employers must immediately distribute the mandatory COVID-19 OR-OSHA Hazards Poster at their worksites and electronically to remote employees.
 - A link to the poster in English and Spanish can be found here:
<https://osha.oregon.gov/OSHAPubs/5504.pdf> and
<https://osha.oregon.gov/OSHAPubs/5504s.pdf>

- **Notification, Testing, and Medical Removal | Due by Nov. 16, 2020**
 - Employers must notify affected workers within 24 hours of a work-related COVID-19 infection; if an employee must quarantine, the employer must follow proper work reassignment and return-to-work steps.
 - OR-OSHA has issued a workplace advisory memo that includes a model policy: <https://osha.oregon.gov/Documents/Model-COVID-19-Notification-Policy.pdf>
- **Exposure Risk Assessment | Due by Dec. 7, 2020**
 - Employers are required to conduct a risk assessment – a process that must involve participation and feedback from employees – to gauge potential employee exposure to COVID-19, including addressing specific questions about how to minimize such exposure.
 - OR-OSHA has released a risk assessment template for employers: <https://osha.oregon.gov/OSHAPubs/pubform/exposure-risk-assessment-form.pdf>
- **Infection Control Plan | Due by Dec. 7, 2020**
 - Employers must develop an infection control plan addressing several elements, including when workers must use personal protective equipment and a description of specific hazard controls.
 - OR-OSHA indicated that it will release a model infection control plan; please check their website for updates: <https://osha.oregon.gov/covid19/Pages/default.aspx>
- **Information and Training | Due by Dec. 21, 2020**
 - Employers must provide information and training to workers about relevant topics related to COVID-19 and workplace safety. They must do so in a manner and language understood by workers.
 - OR-OSHA is developing training, please look for a communication from Risk Management for further details.
- **Building Ventilation | Due by Jan. 6, 2021**
 - Employers must maximize the effectiveness of existing ventilation systems and clean intake ports providing fresh or outdoor air.
 - The temporary rule does not require employers to purchase or install new ventilation systems.

Please continue to check the OR-OSHA website for updates on the temporary rule and other workplace safety requirements. Risk Management will also be in touch regarding additional resources and training.