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COVID-19 UPDATE

JUNE 1, 2020

UPDATE – NEW CHANGES ON COVID-19 AS AN OSHA RECORDABLE ILLNESS

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As of May 26, OSHA has once again implemented a different set of guidelines for recording COVID-19 cases on OSHA 300 injury and illness logs. They have broadened the scope to formally include all industries, and are essentially requiring an accident investigation be performed to help determine *whether a COVID-19 case was contracted while in the workplace.*

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus employers are responsible for recording cases of COVID-19, if:

- *The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC);*
- *The case is work-related as defined by 29 CFR § 1904.5; and*
- *The case involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.*

For determining work-relatedness, OSHA has listed some steps to guide the investigation, which can be found in the second half of the memo. See the link below.

Federal OSHA enforcement memo:

<https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>

Summary of OSHA standards applicable to COVID-19, including the requirement to record these illnesses on the OSHA 300 log:

<https://www.osha.gov/SLTC/covid-19/standards.html>

Guidance on preparing workplaces for COVID-19:

<https://www.osha.gov/Publications/OSHA3990.pdf>

CDC's homepage for COVID-19:

<https://www.cdc.gov/coronavirus/2019-nCoV/index.html>

For assistance or information regarding other impacts this pandemic may have on your business, contact your Parker, Smith & Feek account team.