

SAMPLE COVID-19 Risk Assessment

Conducting an interactive exposure risk assessment with participation and feedback from your employees is not only required, but also beneficial to your business. Having a completed risk assessment will help reduce the exposure to COVID-19. In order to simplify the assessment process, here is an approach using “**Items To Consider**” for each question. All questions must be addressed. Some questions can be answered with “N/A” (not applicable).

If you have more than ten employees statewide (including temporary and part-time workers), or are covered by subsection 1(c) of the temporary rule (*workplaces at exceptional risk*) this assessment must be in writing. If you have multiple facilities that are substantially similar, the assessment may 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.

Business/Employer: RR Manufacturing and Design

Completed by (name): Pat Smith **Date:** 12/3/2020

Job title: Production Manager

Contact information: psmith@rr.com

Employee job classifications evaluated in this assessment

> **Office Personnel**

> **Production-Line Workers**

This sample risk assessment is for workplaces with both office and production-line workers

Physical Distancing

Element To Discuss	
Can employees telework or otherwise work remotely?	
Items To Consider	Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done
<ul style="list-style-type: none"> • Can one or more workers access their work remotely? • Can phones be forwarded, or can staff use cell phones for customer/employee communications? • Can some of your programs or operation systems be changed to make them available remotely? 	<ul style="list-style-type: none"> • We have both production and office workers. • Our office workers can telework but our production workers cannot. • The schedules of production workers has been modify to reduce the number of workers in certain production areas. • The schedules of office staff workers has been modified so that the office has only two staff members present each day for daily operations and customer service. • The office staff met separately and developed a monthly rotation schedule. • Technology issues. Some office workers will have to work in the office more than others because they do not have access to high-speed internet or their personal computers cannot install our company database software. • We are going to look into setting funds aside to purchase some additional “loaner” laptops.
Element To Discuss	
How are employees encouraged or empowered to use those distance work options to reduce COVID-19 transmission at the workplace?	
Items To Consider	Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done
<ul style="list-style-type: none"> • Can the business provide different periodic, multiple days per week, or full-time options? 	<ul style="list-style-type: none"> • We have started this option for our office workers.

<ul style="list-style-type: none"> • Can the business test different arrangements to help the employer and employee identify issues before a permanent telework arrangement is in place? • Can the business provide instructions and guidelines for equipment purchases such as laptops, paper, ink cartridges, postage, etc.? • Can the business implement a probationary period, that gives the employer and employee an opportunity to correct concerns regarding communication and availability? 	<ul style="list-style-type: none"> • Instead of workers buying their own office supplies and submitting expense claims, we will encourage them to use our office supplies because we get a price discount. • Fortunately, our phone system makes it easy to forward calls from individual people to their cell phones. • Hiring additional staff: We will be informing applicants that we have an extended probationary period for staff that work remotely to ensure that it is a good fit and the work gets done. • Senior office staff have volunteered to coach new hires.
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Element To Discuss

What are the anticipated working distances *between employees*?

Items To Consider	Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done
<ul style="list-style-type: none"> • Assess the work-environment configuration as a whole. • A floor plan is helpful when considering how to minimize workplace exposures. • What are the production schedules? Do all the workers have to be present at the same time? • Can customers be contacted to determine their flexibility re: when they receive the product or service? • Assess routine moments when employees get physically close to each other to trouble-shoot a problem. For example, peering at a co-workers' computer screen or looking at machine in need of repair. 	<ul style="list-style-type: none"> • In most areas, the anticipated working distances between employees is less than six feet. • The production tables are bolted to the floor. The CNC machine area, the presses and the saws cannot be moved. This means that there will be certain areas in the plant where workers cannot be feasibly separated by 6 feet. In such instances where employees must be within 6 feet, the involved activities will be kept to a minimum, and ensure they are performed as quickly as is possible to limit the time workers are close together. • However, the assembly tables at the south side of the plant are moveable so we are planning on moving them apart so they are more than six feet from each other. • Most of our aisleways are more than 36 inches wide. So, workers are pretty close to each other when walking around certain common areas (e.g. hallways).

- Our workers are aware of the risks in those common areas and understand that facial coverings must be used in all indoor settings unless in a private individual workspace as defined by OHA.

Element To Discuss

How might working distances *between employees* change during non-routine work activities?

Items To Consider

- Instances when jobs and tasks that are performed irregularly or being performed for the first time.
- Tasks that are done outside normal duties.
- Tasks that don't have a documented procedure.
- Work that is unscheduled and unplanned and may need to be completed immediately.
- Stopping work for emergency repairs.
- Repairs requiring a "buddy" nearby.

Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done

- Mostly this is a N/A for us except for stopping work for emergency repairs or worker injuries. Depending on what breaks down, we may have to adjust work-flow or work-schedules.
- Some of our equipment requires two people to lock it out and they have to be closer than six feet when they do that.
- We are going to review our Lock out / Tag out procedures and identify the machines that need more than one person to lock it out.

Element To Discuss

What is the anticipated working distance *between employees and other individuals*?

Items To Consider

- Other individuals include customers, patrons, delivery workers, repair or construction workers, employee's family members, vendors, and inspectors.
- Assess the work-environment configuration as a whole.
- A floor plan is helpful when considering how to minimize workplace exposures.

Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done

- For the production area this would not usually be an issue because customers do not have access to that area. When we discussed this with the production workers, they said they would ask anyone coming into the production area by mistake to return to the office area. Signs have been posted to notify would-be customers that they are not authorized to be in the production area.
- Sometimes our production workers are sent out to make purchases for things we run out of. For example to a local hardware store.

<ul style="list-style-type: none"> • Instances when your employees have contact with other individuals away from your main place of business. For example, making deliveries, installing, or making repairs at other businesses or homes. 	<ul style="list-style-type: none"> • The office staff has regular contact with customers and delivery people at less than six feet. We have signs on the doors that require anyone coming into the office to wear a face covering and we have a plexiglass barrier at the counter. Staff will be wearing facial coverings in accordance with OHA statewide mask guidance.
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Element To Discuss
 How might working distances *between employees and other individuals* change during non-routine work activities?

<p>Items To Consider</p>	<p>Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done</p>
<ul style="list-style-type: none"> • Contractors installing or repairing equipment and machinery. • Unannounced inspections. • Sending employees out for unexpected purchases. 	<ul style="list-style-type: none"> • When contractors come to do maintenance on the CNC machine, or other contract work such as electrical work or maintenance on the forklifts, we would make everyone aware of this to ensure that everyone stayed at least six feet away whenever possible and that facial coverings were properly used by all individuals.

Element To Discuss
 How have the workplace or employee job duties, or both, been modified to provide at least 6-feet of physical distancing between all individuals?

<p>Items To Consider</p>	<p>Describe Any Physical Modification Or Work-Practices Already Made And What Still Needs To Be Done</p>
<ul style="list-style-type: none"> • Can desks and production tables be moved? If not, can workers using them be physically staggered on the floor to create the 6-foot distance? • Alternately, can employees adjust their work schedules to limit the number of people using the equipment, furniture, etc. at the same time? 	<ul style="list-style-type: none"> • The assembly tables on the south side of the building will be moved so the workers are at least six feet away from each other. • We are going to try modifying our production work-process so that the work stations that are closest to each other are operated at different times. • The production workers without small children have more flexibility to adjust their schedules and some of them have agreed to change their schedules to accommodate the ones with children. • Office workers have been placed on a rotation schedule so that only two workers are present on the office on any given day.

- What essential functions must be performed and goods/services provided to ensure business continuity? Given pay/duty agreements, requirements, etc., can employee duties be adjusted to focus on those essential functions?

Masks, Face Coverings, And Face Shields

Element To Discuss

How are employees and other individuals at the workplace notified where and when masks, face coverings, or face shields are required?

Items To Consider

- Providing training to employees re: when masks must be worn in accordance with the [Oregon Health Authority Guidance for Mask, Face Covering, and Face Shield](#).
- Posting signage in areas seen by both employees and other individuals re: when masks must be worn.
- Can face coverings be provided to employees and others?

Note: Employee-owned face coverings may be allowed for use. If an employee chooses to wear a filtering face piece or other type of respirators as source control, the Voluntary Use Appendix D must be provided to the employee (as directed under the Respiratory Protection Standard 1910.134).

Notes From Interactive Discussion With Employees

- All our employees have been trained on wearing the face coverings according to the OHA guidance's.
- We have the OHA face-covering posters at all entry points to the building, in common areas, and in the office.
- We have cloth face coverings available for customers and staff at no-charge in the office.
- Some of the work we do requires the use of respirators. We have a written respirator program which includes medical evaluations, fit-testing, and training for that. Areas where respirators are required are demarcated with signs and caution barriers.
- If respirators with exhalation valves are utilized, others in the space should be protected by a respiratory protection appropriate for the task being conducted.

Note: If respirators are worn by employees, requirements must be followed according to the Respiratory Protection Standard 29 CFR 1910.134.

Element To Discuss

How is this policy enforced and clearly communicated to employees and other individuals?

Items To Consider

The rule requires that employers must ensure that all individuals (including employees, part-time workers, temporary laborers, customers, vendors, patrons, contractors, etc.) at the workplace or other premises subject to the employer’s control wear a mask, face covering, or face shield as source control in accordance with the requirements of the Oregon Health Authority’s Statewide Mask, Face Covering, Face Shield

Guidance.

- Provide training about the requirement to your employees. Address your procedures on handling other individuals who are not wearing a face-covering or refuse to wear one. This includes how to handle potentially aggressive situations.
- Post signage explaining the requirement.
- Consider using distancing monitors.

Notes From Interactive Discussion With Employees

- In our all-staff discussions, our workers demonstrated their awareness of the risks, and we’ve agreed on a zero-tolerance policy regarding people who do not wear a facial covering or otherwise use a facial covering incorrectly. We did some role-play training to give employees practice telling others in a direct, but courteous tone that their facial covering is missing or being worn incorrectly. Similarly, employees practiced telling “members of the public” that they would not be allowed to enter the establishment without a facial covering.
- We discussed examples where employees need to involve managers in handling escalating or aggressive situations.

Reporting Covid-19 Signs And Symptoms

Element To Discuss	
How have employees been informed about the workplace policy and procedures related to reporting COVID-19 signs and symptoms?	
Items To Consider	Notes From Interactive Discussion With Employees
<ul style="list-style-type: none"> • Oregon OSHA and Oregon Health Authority have training materials and guidelines that can be downloaded to train employees. • A work environment where an employees feel safe about reporting that they don't feel well supports the employer's ability to protect other employees and other individuals, as well as meeting Oregon OSHA and OHA responsibilities. 	<ul style="list-style-type: none"> • We provided training to our employees about COVID-19 symptoms and our expectation that they immediately report when they are not feeling well. • COVID-19 Sign/Symptom posters have been posted in the employee break room, office, and certain locations in the production area. These posters include contact information for the company's Safety Officer.

Working While Quarantining, Isolating, Or On Medical Removal

Element To Discuss	
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?	
Items To Consider	Notes From Interactive Discussion With Employees
<ul style="list-style-type: none"> • For those employees able to work while quarantining or isolating, how would you safely deliver work and equipment to them? • Does the employee have the skills/technical know-how to handle initial set-up of laptops, cell phones, and other work equipment provided to them? • If not, are there other work tasks that they can perform? For example, are there any quality control, paperwork reconciliation, or sorting tasks that they could perform? 	<ul style="list-style-type: none"> • Remote work options are unavailable for production workers. Office workers (as described above) do have telework options. • Employees were informed that they are not required to work remotely while isolating or quarantining unless desired and medically able to do so. • Extra "loaner" laptops are being purchased to provide more office workers with teleworking opportunities.

Ventilation

Element To Discuss

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 COVID-19?

Items To Consider	Notes From Interactive Discussion With Employees
<ul style="list-style-type: none">• Contact the building operator to find out about existing systems and what changes, if any, they are able or willing to do.• Contact vendors who design and installation of physical barriers for options.• Oregon OSHA's Consultation Section is available to discuss ventilation issues or questions.	<ul style="list-style-type: none">• The plant ventilation system was assessed on November 15, including clearing debris from all air intake ports as well as replacing old/damaged filters. The HVAC system has been set to optimize the amount of fresh outside air circulated through the system.• Our company has hired an HVAC professional to determine if HEPA or similar air filters can be installed to improve the overall indoor air quality plant-wide.• Plexiglas barriers have been installed in the office area, particularly customer interaction areas at the front desk.• Barriers have been installed in the south area of the production floor to help separate production workers working along the assembly line.

Foot Traffic

Element To Discuss

How have administrative controls (such as foot-traffic control) been used to minimize employee exposure to COVID-19?

Items To Consider	Notes From Interactive Discussion With Employees
<ul style="list-style-type: none">• A floor plan is helpful when considering how to minimize workplace exposures.• Does the work-space allow for one-way traffic in aisles?• Have bottleneck areas, such as doorways and elevators, been identified?	<ul style="list-style-type: none">• We only have a small number of narrow aisleways, so we've all agreed that we will check to see if others are already in the aisleway and wait until they have passed to avoid two people squeezing by each other.

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| <ul style="list-style-type: none"> • What training and procedures need to be put in place? For example, how should employees and others use elevators? Should the number of occupants be reduced? Should training and signage be used to encourage occupants to face forward and avoid speaking (including on cell-phones)? • Are there dedicated areas for lunch and break periods? If so, what can be done to limit the number of people using them at the same time? | <ul style="list-style-type: none"> • Our breakroom is large and there's one long table. We agreed that there will only be two people at the table and be on opposite ends. We've posted a lunch/break schedule to ensure that only two-people at a time are eating at the table. • Many employees have opted to bring cold lunches and eat off campus, in their person vehicles, or outdoors when the weather allows it. |
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Reporting COVID-19 Hazards

Element To Discuss

What is the procedure or policy for employees to report workplace hazards related to COVID-19?

Items To Consider

- Expand your normal system of communication for reporting general occupational hazards to include COVID-19 related hazards.
- Provide additional awareness training to front-line supervisors and encourage them to ask employees for feedback on a regular basis.

Notes From Interactive Discussion With Employees

- We have designated at least one staff member to serve as a physical distancing monitor, whose duties include identifying such COVID-19 related hazards in the production area. This monitor will also assist other workers with recognizing the symptoms, proper hand hygiene, facial covering use, and ensure that sanitation requirements are completed.

Element To Discuss

How are these hazard reporting procedures or policies communicated to employees?

Items To Consider

- Use your communication methods that work!
- If in-person meetings (physically distanced, of course), have worked, continue using them.
 - The same holds true for email and social media.

Notes From Interactive Discussion With Employees

- All-staff meetings are held on the first Tuesday of each month. Additionally, department teams meet at least weekly. During these staff meetings a section of time is reserved to discuss COVID-19 requirements and if any workers have questions or concerns related to the company's procedures or policies.

Sanitation

Element To Discuss

How are sanitation measures related to COVID-19 implemented in the workplace?

Items To Consider

The [rule](#) requires the employer to regularly clean or sanitize all common areas, shared equipment, and high-touch surfaces that are under its control and that are used by employees or the public:

- At least once every 24 hours if the workplace is occupied less than 12 hours a day.
- At least every 8 hours while in use, if the workplace is occupied more than 12 hours a day.

If your location has only “drop-in” availability or minimal staffing, you can rely on a regular schedule of cleaning and sanitation and direct employees to sanitize their own work surfaces before use.

Notes From Interactive Discussion With Employees

- We have a janitorial company that comes in to sanitize the bathrooms, lunch room, office spaces, and other common areas on a daily basis.
- Employees have been instructed how to properly sanitize shared equipment (e.g. CNC, production tools, etc.) and where cleaning supplies are stored.
- Typically, our plant operates less than 12 hours a day. However, if production needs change, this operating time may change. If that occurs and the plant is occupied for more than 12 hours, additional sanitation measures will be implemented so that cleaning takes place at least every 8 hours.
- We have provided hand sanitizer and disinfectant wipes at multiple locations throughout the plant, including each production department and the office.

<p>Effective implementation includes providing the cleaning and sanitation supplies and the time with which to do the task.</p> <p>Workers are allowed to clean more often than required by the rule.</p> <p>Workers are the best source of feedback as to where supplies should be stationed for ease of use.</p>	
<p>Element To Discuss</p> <p>How have these sanitation practices been explained to employees and other individuals at the workplace?</p>	
<p>Items To Consider</p>	<p>Notes From Interactive Discussion With Employees</p>
<p>Use your communication methods that work!</p> <ul style="list-style-type: none"> • If in-person meetings (physically distanced, of course), have worked, continue using them. • The same holds true for email and social media. • Posters are effective too. 	<ul style="list-style-type: none"> • As stated above, we have monthly all-staff meetings in addition to weekly department meetings. During each meeting there is a discussion of physical distancing, facial covering use, and COVID-19 sanitation requirements. The company has distributed cleaning supplies to areas throughout the plant and office. Employees are reminded where these supplies are stored, how they are used, and what they can do if such supplies are depleted.

Industry-Specific Appendix A Requirements

<p>Element To Discuss</p> <p>How have the 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?</p>	
<p>Items To Consider</p>	<p>Notes From Interactive Discussion With Employees</p>
<p>There are nineteen (19) Appendices. Please review the list of them here to determine if you are covered by one or more of them.</p>	<p>N/A. We are a manufacturing plant.</p>

In addition to physical distancing and face-coverings, some of the appendices require additional measures such as:

- distancing monitors
- implementing one-way flow
- advance screening of employees and customers
- using EPA disinfectants that are registered as bactericidal, viricidal, or fungicidal.

Element To Discuss

How are periodic updates to such guidance documents incorporated into the workplace on an on-going basis?

Items To Consider

- Assign someone to regularly monitor the Oregon Health Authority for updates.
- Ensure that you sign-up for automatic updates from the Oregon Health Authority.
- If any updates affect you, update staff and provide additional training if necessary.

Notes From Interactive Discussion With Employees

N/A. However, we will check to see if there's any changes there that would affect us.

Multiple Employer Worksites

Element To Discuss

In settings where the workers of multiple employers work in the same space or share equipment or common areas, how are the physical distancing; mask, face covering, or face shield requirements; and sanitation measures required under this rule communicated to and coordinated between all employers and their affected employees?

Items To Consider

Does one of the employers have overall responsibility for the area? If so, they should take the lead to ensure that shared areas and common spaces meet the rule requirements.

If no employer has overall control, options include:

Notes From Interactive Discussion With Employees

N/A. We are a stand-alone business that does not have temporary laborers or third party contractors on-site.

- Having a meeting between the multiple employers to discuss how to coordinate and share responsibilities.
- Developing an overall COVID-19 safety policy.
- Conducting regular follow-up meetings.
- Establishing a process to report hazards and correct hazards.
- Designating persons to do frequent and regular monitoring.

Layered Protection

Element To Discuss

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?

Items To Consider

In this context, **“layered protection” does not mean wearing multiple face coverings such as a face-shield over a face-covering. It refers, instead, to implementing engineering controls.**

The U.S. National Institute for Occupational Safety and Health (NIOSH) recommend administrative controls when hazards cannot be removed, changed, and engineering controls are not practical. (See [Hierarchy of Controls](#)).

Some engineering controls are possible. For example, reconfiguring the work environment, physical barriers such as glass enclosures, and ventilation systems with reduced recirculated air and high efficiency (HEPA) filters.

Notes From Interactive Discussion With Employees

- We mentioned that we will be moving the assembly tables on the south side so that we don’t have to be within six-feet from each other.
- By modifying work schedules, we have reduced the number of workers in certain areas to reduce exposure potential.
- Facial covering and sanitation signs have been posted throughout the plant.
- Additional Plexiglas barriers will be installed in the production area to aide with physical distancing and to facilitate source control.
- HVAC system has been assessed and modified to ensure compliance with Oregon OSHA’s temporary rule requirements under subsection 3(f).
- Foot-traffic control stickers have been applied in high-traffic areas of the production floor and in the office.

SAMPLE