



Workplace Advisory Memo 5.26.21

OHA Guidance and Oregon OSHA Rules

Regarding Facial Covering and Social Distancing in Veterinary Practice

This document addresses the interplay of the May 18, 2021 document from the Oregon Health Authority (OHA) entitled “Interim Guidance for Fully Vaccinated Individuals” and the requirements of OAR 437-001-0744 (particularly Appendix A-10).

The basic application of the general physical distancing and facial covering requirements in veterinary practice is addressed by the mandatory appendix. Confusion about those requirements has resulted in veterinary practices believing that the requirements are more restrictive than they are.

A. Veterinarians have options: neither OHA guidance nor the Oregon OSHA rule requires the use of a curbside model.

Appendix A-10 indicates that veterinary employers must take three distinct steps to enforce physical distancing requirements.

The first of those steps itself includes three options:

- Adopt a curbside model, bringing the animal patient into the facility while the owner remains in the vehicle,
- Strictly enforce six-foot physical distancing in the waiting area, or
- Employ a combination of the two.”

The curbside model is an option, as is enforcing six-foot physical distancing in the waiting area. Either of those measures (or a combination of them) is entirely compliant with the language of the appendix.

B. If the vaccination of the individuals involved is verified, none of the physical distancing requirements or facial covering requirements of Appendix A-10 need to be applied.

All three measures listed in Section A of Appendix A-10 are physical distancing measures. Therefore, if the employer has verified that all of the individuals involved have been vaccinated, none of those measures are required (nor does the general requirement related to facial coverings apply).

C. Vaccination must be verified at the time of entry. It need not be verified outside the door of the facility prior to entry, but it must be verified before services are provide.

D. Veterinary employers, like other businesses, can choose whether to allow the vaccination exemption or to simply enforce the facial covering and physical distancing requirements without regard to the exemption.

E. Whenever vaccination has not been verified, the individuals involved must be required to implement physical distancing *and* to wear facial coverings.

Best Practice: Veterinary clinics should use signage to alert customers and other visitors to the jobsite that if they choose to claim the vaccine exemption they will be asked to provide appropriate verification as described in the OHA “Interim Guidance for Fully Vaccinated Individuals.” Provide similar notices on websites, social media, etc.

Best Practice: Clinics should not take copies of documents reviewed regarding the vaccination status of visitors; if the employer has a need to keep a record of the review (perhaps in order to make future verification of the same individual unnecessary), it should simply reflect a “yes/no” determination rather than reproduce the record itself.

The requirements of OAR 437-001-0744 other than those related to distancing and the use of facial coverings remain in place and are not affected by the vaccination exemption.