

## Updated COVID-19 Guidelines for Healthcare Personnel

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There have been rapid developments in COVID-19 guidance issued by both OSHA and the CDC for healthcare personnel (HCP). IRMA has summarized the key points but encourages members to review the standards and guidance materials in their entirety.

### **OSHA COVID-19 Healthcare Emergency Temporary Standard Status**

OSHA has withdrawn the non-recordkeeping portions of its [Healthcare Emergency Temporary Standard \(ETS\)](#) as more than six months has passed without adoption of a permanent standard. The withdrawal will become official once OSHA publishes a notice in the Federal Registrar which is anticipated to occur shortly. Only the COVID-19 log and reporting provisions in the Healthcare ETS will remain in effect. These include [29 CFR 1910.502](#) provisions (q)(2)(ii), (q)(3)(ii)-(iv), and (r).

However, OSHA clearly believes the Healthcare ETS remains relevant and intend to use the Healthcare ETS as a guideline for enforcement under the general duty clause. OSHA states it “*will vigorously enforce the general duty clause and its general standards, including Personal Protective Equipment (PPE) and Respiratory Protection Standards to help protect healthcare employees from the hazard of COVID-19*” with the promise that a permanent standard will soon follow.

### **Illinois Adoption of the Federal OSHA COVID-19 Emergency Temporary Standard**

Qualifying members will be subject to the [Federal OSHA COVID-19 ETS](#) as it has been adopted by Illinois OSHA. The standard will take effect on January 24, 2022, for public employers with 100 or more eligible employees. This standard exempted employee subject to the Healthcare ETS, but once the official withdrawal of the Healthcare ETS is in effect that exemption may no longer apply. The [ETS FAQ](#) 2.J. explicitly states: “*No, the ETS does not apply to employees in settings covered by the Healthcare ETS while that ETS is in effect...*”. Since this ETS will be in effect once the Healthcare ETS has been withdrawn, healthcare employees should be included in the eligible employee count as public employers begin to comply with the ETS.

### **CDC Guideline for Managing HCP with COVID-19 Infection of Exposure**

Due to concerns about increased transmissibility of the Omicron variant, CDC released updated guidance in an effort to enhance protection as well as to address concerns about impacts on the healthcare system given the surge of COVID-19 infections.

[The Interim Guidance for Managing HCP with SARS-CoV-2 Infection of Exposure](#) addresses timeline for testing, return to work and the definition of a high-risk exposure for HCP. The CDC recommendations for [shortening isolation and quarantine](#) lengths made on December 27, 2021, apply to the general public *not* HCP. The guidance specific to HCP has been accepted by IDPH as appropriate, directing all HCP to follow this guideline. In it, CDC outlines a [work restriction model](#) which includes strategies to [mitigate HCP staffing shortages](#).

### **State Mandates**

The current State [Executive Order](#) that requires mandatory vaccination or weekly testing for COVID-19 and face coverings to be worn in all indoor public facilities should continue to be followed. As a reminder, State and local rules and regulations take precedence over CDC recommendations

Please refer to IRMA's [COVID-19 webpage](#) for reliable and current information regarding COVID-19 and the new ETS. Our Risk Management team is also available to answer questions or review policies if needed.