

OSHA's New COVID-19 Guidance: *The Latest Compliance Requirements*



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Jack Fearing, CPEA
April 12, 2021



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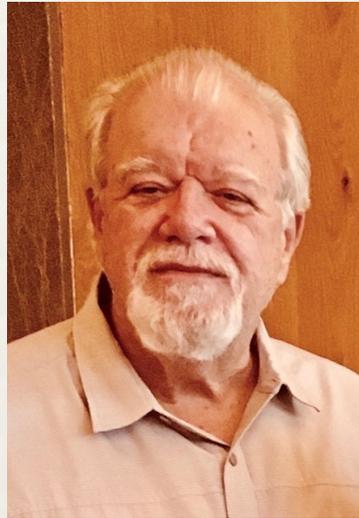
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Today's Speaker



Jack Fearing, CPEA
Managing Partner
Fearing International Group LLC

Presentation Outline



- COVID-19 Impact
 - Recent COVID-19 Enforcement
 - OSHA's COVID-19 Prevention Guidance
- Summary:
- The Four Pillars
 - The Elements
 - Additional Key Measures
- Recent OSHA National Emphasis Program
 - Other Applicable Standards
 - Summary / Q/A

Disclaimer

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COVID-19 Impacts

THE WALL STREET JOURNAL
FRIDAY, MARCH 27, 2020

U.S. Case

Historic run of growth abruptly comes to a close as unemployment filings surge to record

What's News

- Record 3.28 million workers applied for unemployment benefits last week as the economy marks an abrupt end to its historic, decade-long run of job growth. **A1, A2**
- U.S. stocks soared as the government came closer to approving a \$2 trillion stimulus package. The Dow returned to full market territory, gaining 6.6%. The S&P 500 and Nasdaq rose 6.2% and 5.6%, respectively. **A1**
- The relief package passed by the Senate would help stabilize the coronavirus-hit economy, but likely isn't enough to bring it back to health. **A1, A2**
- Members indicated that the U.S. would take steps to return to work in exchange for billions in direct grants to the firms, according to people familiar with the matter. **A1**
- G-20 leaders said they would collectively spend more than \$5 trillion trying to insulate the global economy from the impact of the pandemic. **A3**
- Visions of the worst first in losing some of its ability to burnish a time when its key revenue drivers have ground to a halt. **A1**
- The U.S. is moving ahead with new rules aimed at cutting off financial flows from one of the world's main suppliers of advanced chips. **A1**

World-Wide

- The U.S. has overtaken China as the country with the most confirmed coronavirus cases in the world, at more than 61,000 and counting, a new milestone in the fight against the global pandemic. **A1, A2, A3-A11**
- The Trump administration plans to issue guidelines to curb coronavirus cases by risk to

Hospitals on high alert for deadly coronavirus

STATEN ISLAND

Hospitals on high alert for deadly coronavirus

AGAIN. IN SUNDAY

HEALTH

sky news 24/7 rolling coverage of the

DEVELOPING STORY
CORONAVIRUS SPREAD
New map shows where in the world Wuhan residents have gone
WATCH MORE VIDEOS sunrise.com.au

LIVE

SYDNEY

Michael Sali, Philip Ottermann, Patrick Wintour

CORONAVIRUS **HIBERNATION**

OSHA's COVID-19 Enforcement

Occupational Safety and Health Administration

[CONTACT US](#) [FAQ](#) [A TO Z INDEX](#) [ENGLISH](#) [ESPAÑOL](#)

[OSHA](#) ▾ [STANDARDS](#) ▾ [TOPICS](#) ▾ [HELP AND RESOURCES](#) ▾

[Enforcement Memos](#) / Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19)

May 19, 2020

MEMORANDUM FOR: REGIONAL ADMINISTRATORS
STATE PLAN DESIGNEES

THROUGH: AMANDA EDENS
Deputy Assistant Secretary

FROM: LEE ANNE JILLINGS, Acting Director
Directorate of Technical Support and Emergency Management

PATRICK J. KAPUST, Acting Director
Directorate of Enforcement Programs

SUBJECT: Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19)

This memorandum provides updated interim guidance to Compliance Safety and Health Officers (CSHOs) for enforcing the requirements of 29 CFR Part 1904 with respect to the recording of occupational illnesses, specifically cases of COVID-19. On May 26, 2020, the previous memorandum on this topic^[1] will be rescinded, and this new memorandum will go into and remain in effect until further notice. This guidance is intended to be time-limited to the current COVID-19 public health crisis. Please frequently check OSHA's webpage at www.osha.gov/coronavirus for updates.

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

1. The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC);^[2]
2. The case is work-related as defined by 29 CFR § 1904.5;^[3] and
3. The case involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.^[4]

Confirmed cases of COVID-19 have now been found in nearly all parts of the country, and outbreaks among workers in industries other than healthcare, emergency response, or correctional institutions have been identified. As transmission and prevention of infection have become better understood, both the government and the private sector have taken rapid and evolving steps to slow the virus's spread, protect employees, and adapt to new ways of doing business. As the virus's spread now slows in certain areas of the country, states are taking steps to reopen their economies and workers are returning to their workplaces. All these facts—incidence, adaptation, and the return of the workforce—indicate that employers should be taking action to determine whether employee COVID-19 illnesses are work-related and thus recordable. Given the nature of the disease and ubiquity of community spread, however, in many instances it remains difficult to determine whether a COVID-19 illness is work-related, especially when an employee has experienced potential exposure both in and out of the workplace.

OSHA's COVID-19 Enforcement



OSHA National News Release

U.S. Department of Labor

Please note: As of January 20, 2021, information in some news releases may be out of date or not reflect current policies.

November 6, 2020

U.S. Department of Labor Issues Guidance Alerting Employers to Frequently Cited Standards Related to COVID-19 Inspections

WASHINGTON, DC – The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) has issued [guidance](#) and an accompanying [one-pager](#) to help employers understand which standards are most frequently cited during coronavirus-related inspections. OSHA based these documents on data from citations issued, many of which were the result of complaints, referrals and fatalities in industries such as hospitals and healthcare, nursing homes and long-term care facilities, and meat/poultry processing plants.

The one-pager and guidance document provide available resources that address the most frequently cited standards, including [Respiratory Protection](#), [Recording and Reporting Occupational Injuries and Illnesses](#), [Personal Protective Equipment](#) and the [General Duty Clause](#). The one-pager provides examples of requirements employers must follow, such as:

- Provide a medical evaluation before a worker is fit-tested or uses a respirator.
- Establish, implement, and update a written respiratory protection program with required worksite-specific procedures.
- Train workers to safely use respirators and/or other PPE in the workplace, and retrain workers about changes in the workplace that might make previous training obsolete.
- Store respirators and other PPE properly in a way to protect them from damage, contamination, and, where applicable, deformation of the facepiece and exhalation valve.
- Keep required records of work-related fatalities, injuries, and illness.

OSHA is providing the guidance to help employers protect workers and increase compliance with OSHA requirements.

OSHA's [On-Site Consultation Program](#) offers no-cost and confidential occupational safety and health services to small- and medium-sized businesses to identify workplace hazards, provides advice for compliance with OSHA standards, and assists in establishing and improving safety and health programs. On-Site Consultation services are separate from enforcement and do not result in penalties or citations.

OSHA Guidance on Mitigating & Preventing the Spread of COVID-19 in the Workplace

(January 29, 2021)

OSHA's COVID-19 Enforcement



OSHA National News Release

U.S. Department of Labor

March 12, 2021

OSHA launches program to protect high-risk workers from coronavirus, focuses on employers that retaliate against workers with safety concerns

WASHINGTON, DC – In response to President Biden's executive order on protecting worker health and safety, the U.S. Department of Labor's [Occupational Safety and Health Administration](#) has launched a [national emphasis program](#) focusing enforcement efforts on companies that put the largest number of workers at serious risk of contracting the coronavirus. The program also prioritizes employers that retaliate against workers for complaints about unsafe or unhealthy conditions, or for exercising other rights protected by federal law.

"This deadly pandemic has taken a staggering toll on U.S. workers and their families. We have a moral obligation to do what we can to protect workers, especially for the many who have no other protection," said Principal Deputy Assistant Secretary of Labor for Occupational Safety and Health Jim Frederick. "This program seeks to substantially reduce or eliminate coronavirus exposure for workers in companies where risks are high, and to protect workers who raise concerns that their employer is failing to protect them from the risks of exposure."

NEP inspections will enhance the agency's previous coronavirus enforcement efforts, and will include some follow-up inspections of worksites inspected in 2020. The program's focused strategy ensures abatement and includes monitoring the effectiveness of OSHA's enforcement and guidance efforts. The program will remain in effect for up to one year from its issuance date, though OSHA has the flexibility to amend or cancel the program as the pandemic subsides.

"With more people being vaccinated and the number of infections trending down, we know there is light at the end of the tunnel. But until we are past this pandemic workers deserve a Labor Department that is looking out for their health," added Frederick.

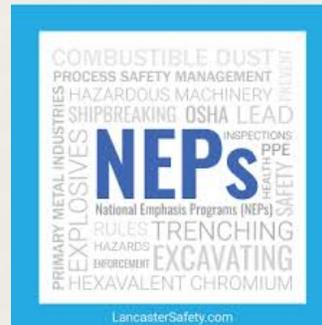
OSHA state plans have adopted varying requirements to protect employees from coronavirus, and OSHA knows many of them have implemented enforcement programs similar to this NEP. While it does not require it, OSHA strongly encourages the rest to adopt this NEP. State plans must notify federal OSHA of their intention to adopt the NEP within 60 days after its issuance.

In a related action, OSHA has also updated its [Interim Enforcement Response Plan](#) to prioritize the use of on-site workplace inspections where practical, or a combination of on-site and remote methods. OSHA will only use remote-only inspections if the agency determines that on-site inspections cannot be performed safely. On March 18, 2021, OSHA will rescind the May 26, 2020, memorandum on this topic and this new guidance will go into and remain in effect until further notice.

OSHA will ensure that its Compliance Safety and Health Officers have every protection necessary for onsite inspections. When conducting on-site inspections, OSHA will evaluate all risk and utilize appropriate protective measures, including appropriate respiratory protection and other necessary personal protective equipment.

National & Special Emphasis Programs

National Emphasis Programs (NEPs) are temporary programs that focus OSHA's resources on particular hazards and high-hazard industries.



National Emphasis Programs

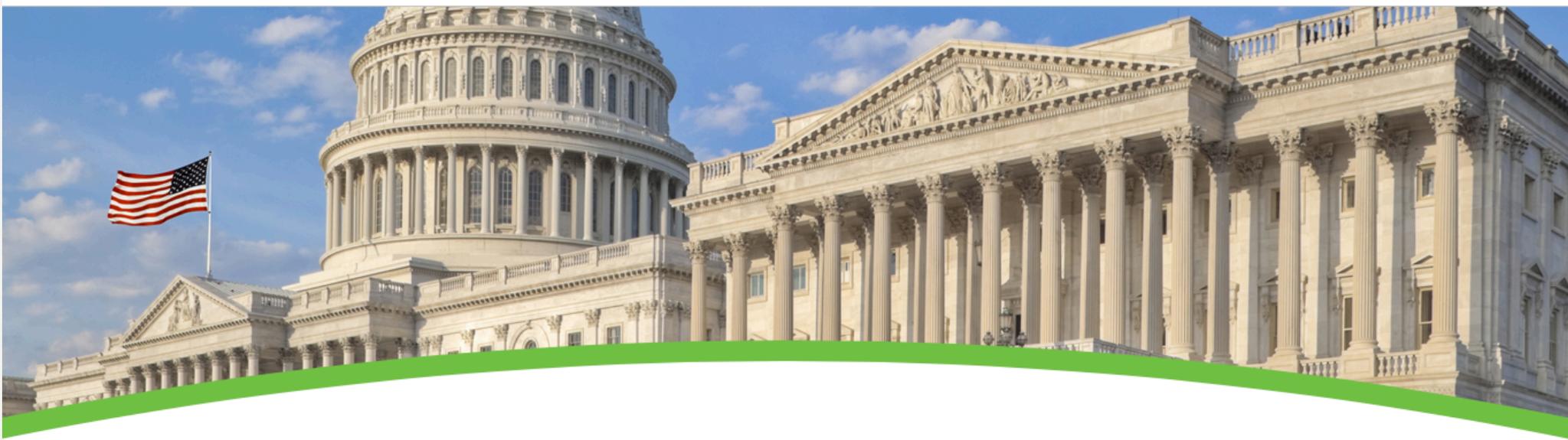
Active Programs
Amputations (2019)
Combustible Dust (2008)
COVID-19 (2021)
Federal Agencies (2008)
Hazardous Machinery (2015)
Hexavalent Chromium (2010)
Lead (2008)
Primary Metal Industries (2014)
Process Safety Management (2017)
Shipbreaking (2016)
Silica (2008)
Trenching & Excavation (1985)

OSHA Guidance on Mitigating & Preventing the Spread of COVID-19 in the Workplace

(January 29, 2021)

Executive Summary:

This *guidance* is intended to inform employers and workers in most workplace settings outside of healthcare to help them identify risks of being exposed to and/or contracting COVID-19 at work and to help them determine appropriate control measures to implement.



The Four Pillars of the Directive

- Conduct risk assessments
- Identify control measures to limit spread
- Develop, adopt & communicate essential policies (including non-English speaking employees)
- Implement protection from retaliation

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Elements to the OSHA Workplace Guidance Directive

- Assign a COVID-19 Workplace Coordinator*
- Identify High Risk Exposure Areas & Operations*
- Identify Measures to Limit the Spread of COVID-19
- Policies & Procedures to Protect High Risk Employees
- An Effective Communication System
- Education & Training regarding Policies & Procedures*
- Instructions on Isolation and Quarantine (I&Q)*
- Minimize the Negative Impacts of I&Q

Elements to the OSHA Workplace Guidance Directive

- Isolate employees who show symptoms at work
- Perform enhanced cleaning after signs of workplace exposure
- Provide guidance on screening & testing
- Accurately report and record COVID-19 cases*
- Protect employees from retaliation*
- Provide vaccinations for all employees
- No distinctions between vaccinated & non-vaccinated employees
- Other applicable OSHA standards*

Additional Key Measures

- Isolation & Quarantine
- Physical Distancing
- Barriers
- Face Coverings
- Improving Ventilation*
- PPE
- Personal Hygiene
- Routine Cleaning & Disinfecting



COVID-19 Workplace Coordinator

- Selection criteria
- Implement, monitor & report COVID-19 required control strategies
- Remain onsite whenever employees are present
- An alternate may be designated



Employer Responsibilities

- ***Examine the workplace for hazardous conditions***
- Mitigate or eliminate hazards
- Educate and inform employees about workplace hazards
- Establish safe operating procedures and update them when necessary



A Practical Example of Risk

*“Uncertainty About A
Potentially Bad Outcome”*



Employee Risk Categories

VERY HIGH EXPOSURE RISK

Jobs with a high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures.

HIGH EXPOSURE RISK

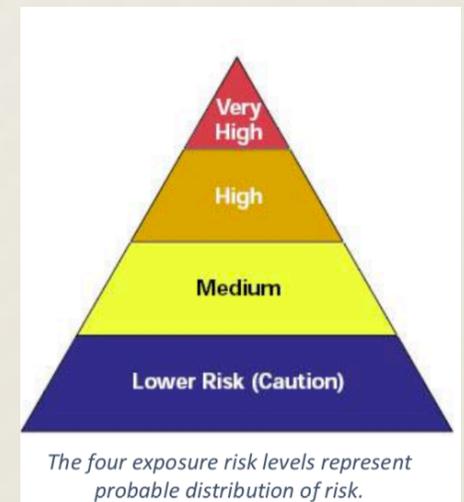
Jobs with a high potential for exposure to known or suspected sources of COVID-19.

MEDIUM EXPOSURE RISK

Jobs that require frequent/close contact with people who may be infected, but who are not known or suspected patients.

LOWER EXPOSURE RISK (Caution)

Jobs that do not require contact with people known to be, or suspected of being, infected.



COVID -19 Risk Assessment Matrix

(aka “Heat Map”)

		Likelihood Rating					
		Very Unlikely due to unanticipated exposure to sources of infection, robust infection control measures, and/or isolation	Unlikely due to unanticipated exposure to sources of infection and minimal infection control measures.	Possible due to unanticipated exposure to known or suspected sources of infection	Likely due to occasional exposure to known or suspected sources of infection	Very likely due to routine exposure to known or suspected sources of infection	
		1	2	3	4	5	
Severity Rating	Death or Permanent Disability	5	5	10	15	20	25
	Hospitalization of 3 or more people	4	4	8	12	16	20
	Hospitalization of 1 - 2 persons	3	3	6	9	12	15
	Positive test result, mild symptoms, at home quarantine	2	2	4	6	8	10
	Positive test result, no symptoms, at home quarantine. Or vaccinated	1	1	2	3	4	5

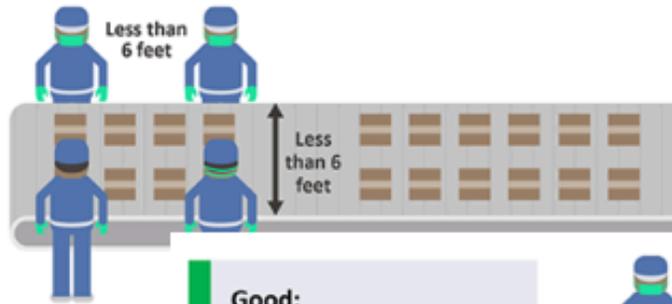
OSHA Risk Categories: Very High Risk = 15 or greater; High Risk = 9 - 14; Moderate Risk = 5 to 8; Low Risk = 1 to 4

Ideal Outcomes

How to Align Manufacturing Workstations, If Feasible

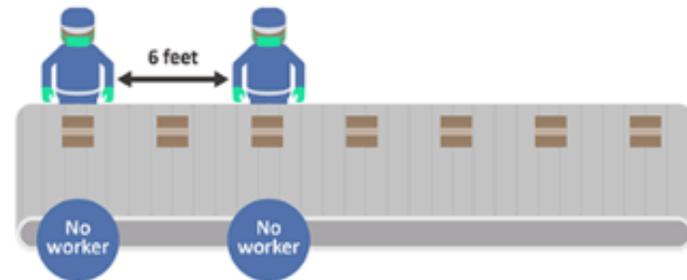
Bad:

Workers are within six feet of one another, including at side-by-side or facing workstations.



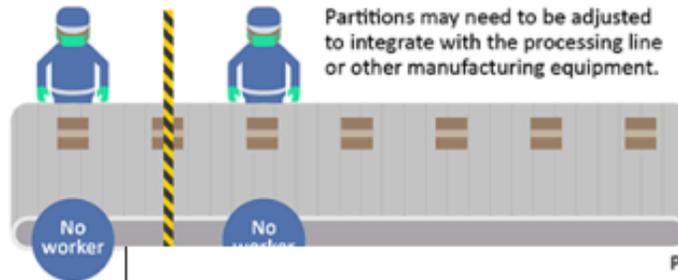
Good:

Workers are spaced at least six feet apart, not facing one another. Another setup may be used to achieve similar distancing between workers.



Good:

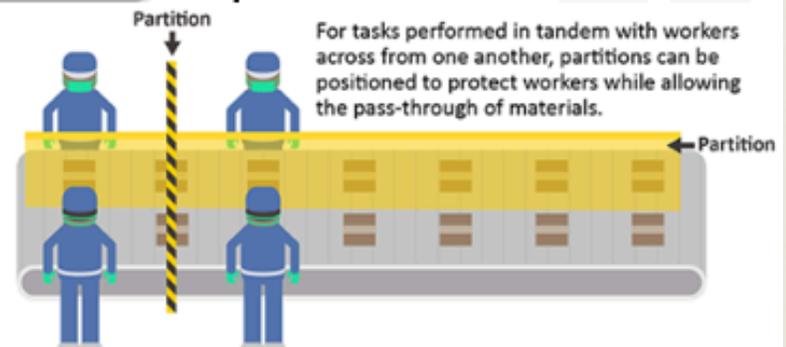
Physical barriers, such as partitions, separate workers from each other.



Partitions may need to be adjusted to integrate with the processing line or other manufacturing equipment.

Good:

Physical barriers, such as partitions, separate workers from each other, including where workers need to perform tasks in tandem across from one another.



For tasks performed in tandem with workers across from one another, partitions can be positioned to protect workers while allowing the pass-through of materials.

Risk Assessment Take-A-Ways

1. Risk Assessments only reflect a 'snapshot in time' and must be continuously monitored for changes
2. Local Community Spread is a major consideration and must also be monitored for changes
3. Your risk assessments are key guidance documents for making professional judgements for your company related to COVID-19



Tip #206

Support worker input to develop training on specific workplace hazards.

Employee Education & Training

- Employer shall:
 - Provide training on SARS-CoV-2 & COVID-19
 - Communicate and train in the primary language common in the employee population
 - Update as necessary
- Training shall cover:
 - Workplace infection control practices
 - Proper use of PPE
 - Steps to follow if COVID-19 symptoms or a case is suspected
 - Reporting unsafe working conditions





Isolation vs. Quarantine

Workers who have or likely have COVID-19 should **isolate** until they meet CDC guidelines for exiting isolation.

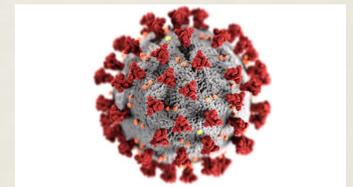
Workers should **quarantine** if they have been exposed to COVID-19, which means: They were within 6 feet of someone who has COVID-19 for a total of 15 minutes or more within a 24-hour period.

COVID-19 Recordkeeping

On May 26, 2020, OSHA issued revised enforcement guidance that provides time-limited exceptions to its recordkeeping requirements for recording cases of COVID-19.

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

- Is work-related as defined by 29 CFR 1904.5
- Involves one or more of the recording criteria
- Is confirmed as a COVID-19 illness by the CDC



Note: The agency also stated that it will not require employers to determine work-relatedness of cases except where: 1) there is objective evidence that a COVID-19 case may be work-related; and 2) the evidence was reasonably available to the employer.

Recording 'Work from Home' Cases

Injuries and illnesses that occur while an employee is working from home are **work-related** if they:

- Occur while the employee is performing work for pay or compensation in the home
- Are **directly** related to the performance of work rather than the general home environment



CDC Criteria for COVID-19

- **Clinical Criteria:**
 - At least two of the following symptoms, **OR**
 - At least one of the following symptoms, **OR**
 - Severe respiratory illness with at least one of the following, **AND**
 - No alternative more likely diagnosis
- **Laboratory Criteria: (FDA)**
- **Epidemiologic Linkage: (Contact & Travel)**



Recording COVID-19 Cases

OSHA's Form 300 (Rev. 01/2004)						Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.		Year <input type="text"/>									
Log of Work-Related Injuries and Illnesses								U.S. Department of Labor Occupational Safety and Health Administration									
You must record information about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR 1904.8 through 1904.12. Feel free to use two								Form approved OMB no. 1218-0176									
						Establishment name <input type="text"/>											
						City <input type="text"/>		State <input type="text"/>									
Identify the person		Describe the case			Classify the case				Enter the number of days the injured or ill worker was:			Check the "injury" column or choose one type of illness:					
(A)	(B)	(C)	(D)	(E)	(F)	CHECK ONLY ONE box for each case based on the most serious outcome for that case:				Enter the number of days the injured or ill worker was:		Check the "injury" column or choose one type of illness:					
Case No.	Employee's Name	Job Title (e.g., Welder)	Date of injury or onset of illness (mo./day)	Where the event occurred (e.g. Loading dock north end)	Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g. Second degree burns on right forearm from acetylene torch)	Death	Days away from work	Remained at work		Away From Work (days)	On job transfer or restriction (days)	(M) Injury	Skin Disorder	Respiratory Condition	Poisoning	Hearing Loss	All other illnesses:
						(G)	(H)	Job transfer / restriction	Other recordable cases	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)
1	Mark Bagin	Welder	5/25	basement	COVID-19	<input checked="" type="checkbox"/>								<input checked="" type="checkbox"/>			
2	Shana Alexander	Foundry man	7/2	pouring dock	COVID-19		<input checked="" type="checkbox"/>			180				<input checked="" type="checkbox"/>			

Employee Protection from Retaliation



OSHA's Whistleblower Protection Program

OSHA's Whistleblower Protection Program enforces the provisions of more than 20 federal laws protecting employees from retaliation for, among other things, raising or reporting concerns about hazards or violations of various workplace safety and health, aviation safety, commercial motor carrier, consumer product, environmental, financial reform, food safety, health insurance reform, motor vehicle safety, nuclear, pipeline, public transportation agency, railroad, maritime, and securities laws. Employees who believe that they have experienced retaliation in violation of one of these laws may file a complaint with OSHA.

Whistleblower Laws Enforced by OSHA

Following is a list of statutes over which OSHA has jurisdiction. Each statute has a different time frame in which a complaint can be filed.

- *Asbestos Hazard Emergency Response Act (90 days)*
- *Clean Air Act (30 days)*
- *Comprehensive Environmental Response, Compensation and Liability Act (30 days)*
- *Consumer Financial Protection Act of 2010 (180 days)*
- *Consumer Product Safety Improvement Act (180 days)*
- *Energy Reorganization Act (180 days)*
- *Federal Railroad Safety Act (180 days)*
- *Federal Water Pollution Control Act (30 days)*
- *International Safe Container Act (60 days)*
- *Moving Ahead for Progress in the 21st Century Act (motor vehicle safety) (180 days)*
- *National Transit Systems Security Act (180 days)*
- *Occupational Safety and Health Act (OSH Act) (30 days)*
- *Pipeline Safety Improvement Act (180 days)*
- *Safe Drinking Water Act (30 days)*
- *Sarbanes-Oxley Act (180 days)*
- *Seaman's Protection Act (180 days)*
- *Section 402 of the FDA Food Safety Modernization Act (180 days)*
- *Section 1558 of the Affordable Care Act (180 days)*
- *Solid Waste Disposal Act (30 days)*
- *Surface Transportation Assistance Act (180 days)*
- *Toxic Substances Control Act (30 days)*
- *Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (90 days)*

What is Retaliation?

Retaliation is an adverse action against an employee because of activity protected by one of these whistleblower laws. Retaliation can include several types of actions, such as:

- Firing or laying off
- Blacklisting
- Demoting
- Denying overtime or promotion
- Disciplining
- Denying benefits
- Failing to hire or rehire
- Intimidation
- Reassignment affecting promotion prospects
- Reducing pay or hours
- Making threats

Filing a Complaint

Employees who believe that their employers retaliated against them because they engaged in protected activity should contact OSHA as soon as possible because they must file any complaint within the legal time limits.

An employee can file a complaint with OSHA by visiting or calling his or her local OSHA office, sending a written complaint to the closest OSHA office, or filing a complaint online. No particular form is required and complaints may be submitted in any language.

Written complaints may be filed by fax, electronic communication, hand delivery during business hours, U.S. mail (confirmation services recommended), or other third-party commercial carrier.



Other Applicable OSHA Standards

- Personal Protective Equipment (PPE)
 - Respirators
 - Eye & Face
 - Gloves
- General Duty Clause (5.a.1.)
 - Housekeeping
 - Ergonomics
- Recordkeeping & Retention
- Hazard Communication
- Bloodborne Pathogens
- Subparts J & Z
- Others in Construction (1926)

Note: Must also consider related training requirements

OSHA's COVID-19 Enforcement



OSHA National News Release

U.S. Department of Labor

Please note: As of January 20, 2021, information in some news releases may be out of date or not reflect current policies.

January 8, 2021

U.S. Department of Labor's OSHA Announces \$3,930,381 In Coronavirus Violations

WASHINGTON, DC – Since the start of the coronavirus pandemic through Dec. 31, 2020, the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) has issued citations arising from 300 inspections for violations relating to coronavirus, resulting in proposed penalties totaling \$3,930,381.

OSHA inspections have resulted in the agency citing employers for violations, including failures to:

- Implement a [written respiratory protection program](#);
- Provide a medical evaluation, respirator fit test, training on the proper use of a respirator and personal protective equipment;
- [Report](#) an injury, illness or fatality;
- Record an injury or illness on OSHA [recordkeeping forms](#); and
- Comply with the [General Duty Clause](#) of the Occupational Safety and Health Act of 1970.

OSHA has already announced citations relating to the coronavirus arising out of 294 inspections, which can be found at [dol.gov/newsroom](https://www.dol.gov/newsroom). In addition to those inspections, the six inspections below have resulted in coronavirus-related citations totaling \$81,159 from OSHA relating to one or more of the above violations from Dec. 25 to Dec. 31, 2020. OSHA provides more information about individual citations at its [Establishment Search website](#), which it updates periodically.

OSHA's General Duty Clause

“Each employer shall furnish to each of their employee’s employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees”.



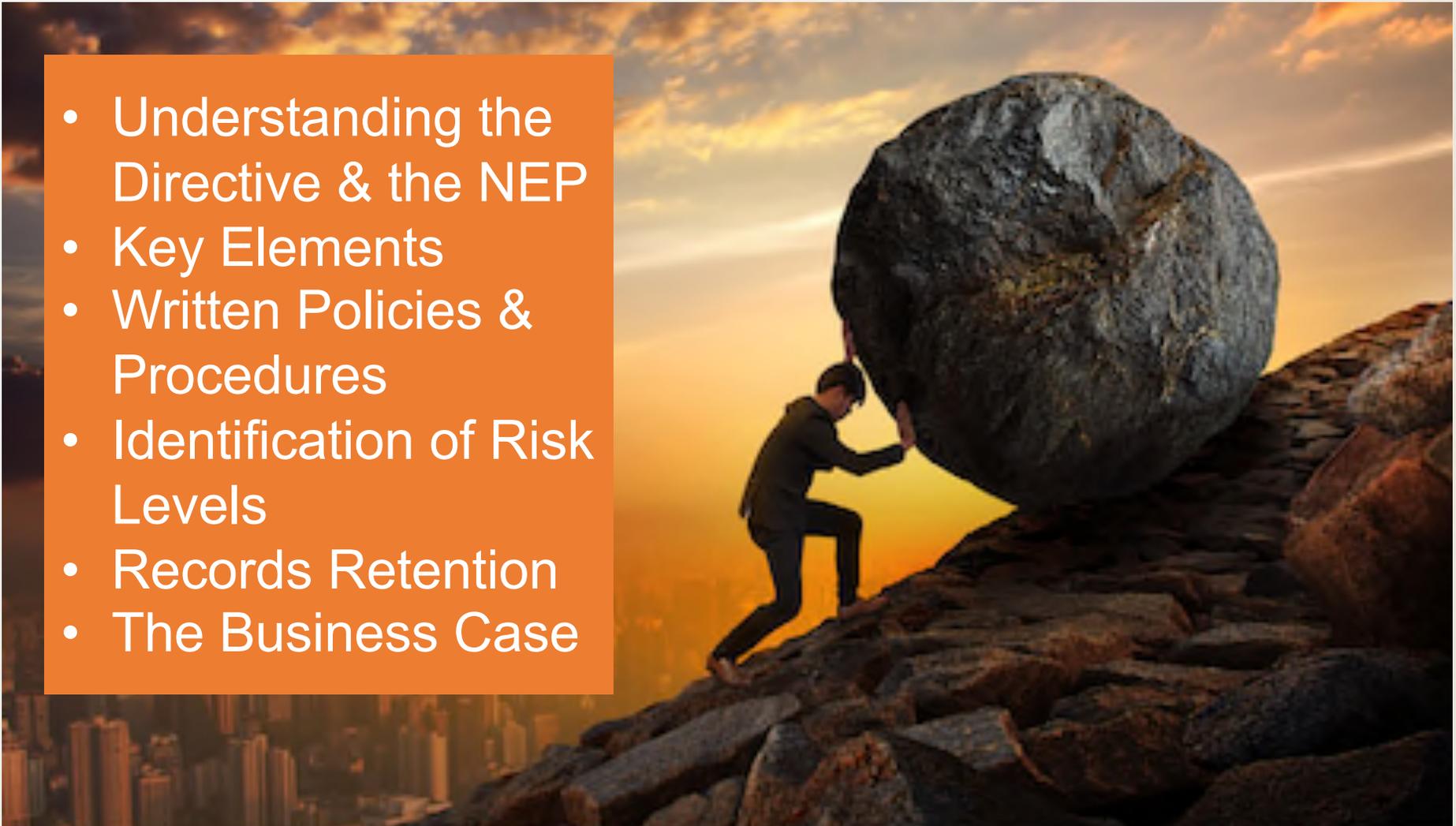
Current OSHA Citations & Penalties

TYPE OF VIOLATION	PENALTY MINIMUM	PENALTY MAXIMUM
OTHER THAN SERIOUS SERIOUS POSTING REQUIREMENTS	OTS - \$0. per violation Serious - \$946. per violation Posting - \$0. per violation	\$13,653. max. per violation
WILLFUL & REPEAT	\$9,639. per violation	\$136,532. max. per violation
FAILURE TO ABATE	N/A	\$13,653. per day beyond the abatement date.

Bipartisan Budget Act of 2015 – Aug 2016 (Effective Jan 2021)

Challenges to OSHA Guidance Compliance...

- Understanding the Directive & the NEP
- Key Elements
- Written Policies & Procedures
- Identification of Risk Levels
- Records Retention
- The Business Case





Thank You for Your Participation

Jack Fearing, CPEA

Managing Partner

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About the Speaker

Jack is a Certified Professional Environmental Auditor (CPEA) and the Managing Partner for Fearing International Group LLC, a Veteran-owned Small Business (VOSB) occupational and aviation safety consulting firm located in Flemington, NJ.

He has more than 35 years of experience in occupational safety and health management and DOD aviation safety. He is a professional member of the New Jersey chapter of the American Society of Safety Professionals (ASSP) and was the chapter Safety Professional of the Year (SPY) in 2019.

Jack has extensive hands-on experience in developing OSHA compliance programs, employee and management training and coordinating with state and Federal regulatory agencies in both union and non-union environments. Jack is a graduate of the University of Massachusetts (BS in Biology) and Boston University (M.Ed in Environmental Science). He is a retired US Army LTC and served as a utility helicopter pilot and Aviation Safety Officer in a Combat Aviation Brigade.