

Ensuring an OSHA ETS Compliant Cleaning and Disinfection Program

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On January 31, 2020, the U.S. Department of Health and Human Services declared the COVID-19 situation a public health emergency.¹ Nearly a year and a half later, in June 2021, the Occupational Safety and Health Administration (OSHA) issued the COVID-19 Emergency Temporary Standard (ETS) CFR 1910.502.²

The purpose of the ETS is to protect healthcare workers from occupational exposure to COVID-19 with an emphasis on respiratory protection. The ETS requires employers in all healthcare settings to develop and implement a COVID-19 Plan to identify and control COVID-19 hazards. While respiratory protection is the focus of the ETS, it's important not to overlook the cleaning and disinfection requirements of this standard, which this article will highlight.

OSHA ETS Cleaning and Disinfection Requirements

Employers must conduct a hazard assessment of the entire workplace to identify and understand where COVID-19 hazards might exist and what controls must be implemented to minimize the risk of COVID-19 transmission.

High risk areas, tasks and occupations must be identified in the assessment. This includes the identification of high-touch surfaces. Facilities are expected to follow both the CDC's "[Guidelines for Environmental Infection Control in Healthcare Facilities](#)" for standard practices for cleaning and disinfection of surfaces and equipment as well as the COVID-specific recommendations found in the CDC's "[Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the COVID-19 Pandemic](#)".

OSHA ETS Cleaning & Disinfection Requirements²

Purpose: Protect healthcare workers from COVID-19 hazards

Hazard assessments

Appropriate products

Equipment cleaning

**Delay room entry
for terminal cleaning**

**Compliance with
cleaning procedures**

**Consider adjunct
technology**

**Policies & procedures
for cleaning & disinfection**

The CDC COVID-19 guidance calls for the following:

- ▶ Equipment that cannot be dedicated to the patient room is to be cleaned and disinfected per manufacturer's instructions for use (IFUs) between every patient.
- ▶ Ensuring that environmental cleaning and disinfection procedures are followed consistently and correctly.
- ▶ Use of an EPA-registered disinfectant from [EPA's List N](#). Appropriate disinfectant formats include ready-to-use sprays, concentrates and wipes.
- ▶ Delay room entry for terminal cleaning until time has elapsed for enough air changes to remove potentially infectious particles. After this time, EVS personnel can enter the room wearing a face mask (for source control) along with a gown and gloves. Eye protection should be added if splashes or sprays during cleaning and disinfection activities are anticipated or otherwise required based on the selected cleaning products.
- ▶ No-touch devices (NTDs) can be used as an adjunct to terminal cleaning. UV, [electrostatic sprayers](#) and foggers are examples of NTDs.

OSHA ETS: Required Cleaning Frequencies²

**Once daily
(minimum) &
visibly soiled**

- ▶ High-touch surfaces

**After aerosol-
generating
procedures**

- ▶ Surfaces
- ▶ Equipment

**When an area has
been used by a COVID
positive person
in the workplace**

- ▶ Areas
- ▶ Materials
- ▶ Equipment

OSHA Inspection Procedures

Furthermore, the ETS requires that employers have cleaning and disinfecting policies and procedures. The cleaning frequencies to be included in the policies are outlined below:

- ▶ High-touch surfaces are to be cleaned at a minimum of least once per day and when visibly soiled. However, I recommend increased frequency for high-touch surfaces to reduce transmission risk of not only COVID-19 but other pathogens as well.
- ▶ After an aerosol-generating procedure on a person with suspected or confirmed COVID-19, clean and disinfect the surfaces and equipment in the room or area where the procedure was performed.
- ▶ In other areas, when a COVID-19 positive person has been in the workplace within the last 24 hours, clean and disinfect any areas, materials and equipment that have likely been contaminated.
- ▶ Ensure that employees have sufficient time during their work shift to perform the required cleaning and disinfection activities.

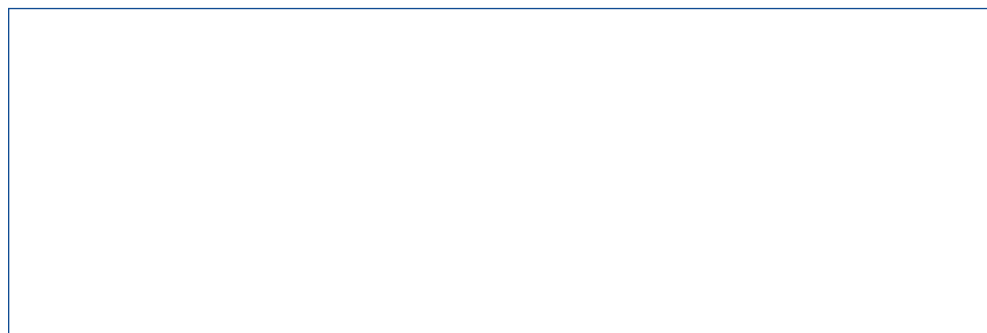
To avoid costly citations, you may wish to familiarize yourself with the [OSHA Inspection Procedures](#).³

When will the OSHA ETS end? In all likelihood, when the public health emergency is declared over, the ETS will “end” with the many of the elements being absorbed into other existing OSHA standards, such as the general respiratory protection standard.



References:

1. U.S. Department of Health and Human Services. Determination that a Public Health Emergency Exists [internet]. [cited 2021 Aug 21]. Available from <https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx>
2. Occupational Safety and Health Administration. COVID-19 Emergency Temporary Standard. COVID-19 Healthcare ETS [internet]. [cited 2021 Aug 21]. Available from <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.502>
3. Occupational Safety and Health Administration. Inspection Procedures for the COVID-19 Emergency [internet]. [cited 2021 Aug 21]. Available from https://www.osha.gov/sites/default/files/enforcement/directives/DIR_2021-02_CPL_02.pdf



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