

COVID-19 Emergency Temporary Standard (ETS) 1910.501

# **OSHA COVID-19 Vaccination and Testing Organizational Self-Assessment Tool**

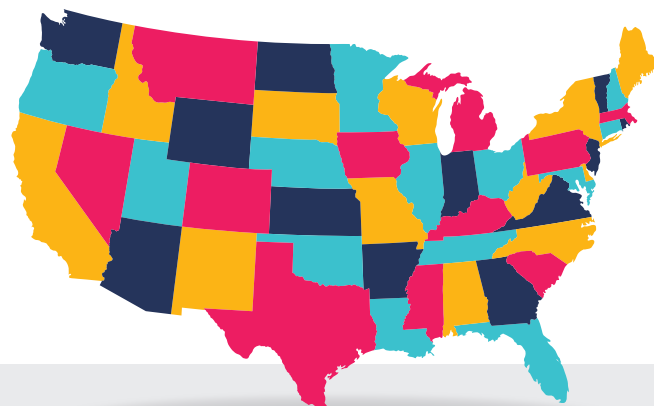


# Are you prepared?

On Nov. 5, 2021, OSHA released a new Emergency Temporary Standard (ETS), standard 1910.501, related to testing, vaccine tracking, face coverings, reporting, and communication with employees. **We want to help you, the employer, evaluate your company's programs and policies to create a COVID-safe workplace and identify areas you may need to work on.**

To help you get ready, **HSI has developed this self-assessment and guidance document** on the 6 focus areas you should be ready to address to protect your workforce and to ensure you are prepared for OSHA enforcement activities. We've also created a [document containing the full standard](#) to help you fully understand OSHA's expectations.

Before using this tool, determine if this OSHA standard applies to your workplace and your employees (review 1910.501(b)(1)-(b)(3)(iii) of the standard). If your company doesn't fall under the OSHA standard, this assessment tool can be used to evaluate the safety of your workplace as it pertains to COVID-19 and to review best practices to keep employees and customers safe.



**Please note that states with state plans must amend their standards to be either identical to or “at least as effective” as the federal government standard. Because OSHA regulations are the minimum, basic principles of this standard (and therefore the assessment tool) apply to all states. Both state plans and employers can enforce more stringent regulations than detailed in OSHA regulations, however states and employers cannot do less than OSHA mandates.**

**If you live in a state plan state, please consult your state OSHA website for information on COVID-19 specific regulations.**

**Review each question and rate your organization on a scale of 1-3:**

- 1 = not complete
- 2 = needs work
- 3 = complete

**After completing this assessment, prioritize your safety efforts on sections that have mostly 1s.**

Questions to Ask	Citation	Status (1-3)
<p>Have you reviewed the definitions of the nine key terms in this standard?</p>	1910.501(c)	<input type="checkbox"/>
<p>Have you provided your employees the following information in a language they understand?</p> <ul style="list-style-type: none"> <li>■ The CDC document, <a href="#">“Key Things to know about COVID-19 Vaccines”</a>.</li> <li>■ Knowledge they cannot be discriminated against or discharged for reporting work-related injuries or illnesses or exercising their rights under the OSHA Act.</li> <li>■ They cannot knowingly provide false statements or documents without risking criminal penalties.</li> <li>■ Your company policies and procedures (to comply with this law)</li> </ul>	1910.501(j)(1)-(j)(4)	<input type="checkbox"/>
<p>Do you have a system in place to ensure compliance with all elements of this law except testing requirements for employees who are not fully vaccinated by January 10, 2022 (or updated deadline published by OSHA)?</p>	1910.501(m)(2)(i)	<input type="checkbox"/>
<p>Do you have a system in place to ensure compliance with COVID-19 testing for employees who are not fully vaccinated by February 9, 2022 (or updated deadline published by OSHA)?</p>	1910.501(m)(2)(ii)	<input type="checkbox"/>
<p>Have you considered incorporating COVID-19 safety policies and procedures for non-employees (e.g., visitors, customers) and for employees of other employers (e.g., contractor employees)?</p>	<a href="#">OSHA Vaccination Policy Templates</a>	<input type="checkbox"/>

# Vaccinations

Questions to Ask	Citation	Status (1-3)
Do you have a written vaccination policy? (either a mandatory vaccination policy or a vaccination or testing and face covering policy)	1910.501(d)(1)-(d)(2)	<input type="checkbox"/>
Are you collecting and preserving proof of vaccination status for all employees fully or partially vaccinated with one of the seven acceptable document types?	1910.501(e)(1)-(e)(2)(vi)(c)	<input type="checkbox"/>
Are you maintaining a roster of fully and partially vaccinated employees?	1910.501(e)(4)	<input type="checkbox"/>
Are you maintaining vaccination records and a roster of vaccinated employees in accordance with employee medical record requirements established in 1910.1020?	1910.501(e)(4)	<input type="checkbox"/>
Are you providing up to four hours paid time for each dose (at reg. rate of pay) for employees to be vaccinated?	1910.501(f)(1)(i)-(ii)	<input type="checkbox"/>
Are you providing reasonable time and paid sick leave for employees experiencing side effects after receiving each dose?	1910.501(f)(2)	<input type="checkbox"/>

Questions to Ask	Citation	Status (1-3)
Are your employees who work with others or customers who are not fully vaccinated being tested for COVID-19 every 7 days?	1910.501(g)(1)-(g)(1)(i)(B)	<input type="checkbox"/>
Are your unvaccinated or not fully vaccinated employees who periodically work with coworkers or customers tested within 7 days of returning to work (exposing themselves to others)?	1910.501(g)(1)(ii)-(g)(1)(ii)(B)	<input type="checkbox"/>
Are your employees providing documentation of COVID-19 test results before returning to work?	1910.501(g)(1)(i)(B) and 1910.501(g)(1)(ii)(B)	<input type="checkbox"/>
Are you removing from your workplace employees who are not fully vaccinated and unvaccinated who have not provided proof of COVID-19 testing until they provide proof?	1910.501(g)(2)	<input type="checkbox"/>
Are you suspending requiring proof of COVID-19 testing for 90 days after an employee has tested positive or has been diagnosed with COVID-19 by a licensed health care provider?	1910.501(g)(3)	<input type="checkbox"/>
Are you keeping records of all COVID-19 test results and maintaining them as employee medical records?	1910.501(g)(4)	<input type="checkbox"/>
<p>Are you only accepting COVID-19 test results from:</p> <ul style="list-style-type: none"> <li>■ Tests processed by a laboratory (including home or on-site collected specimens which are processed either individually or as pooled specimens)</li> <li>■ Proctored over-the-counter tests</li> <li>■ Point of care tests</li> <li>■ Tests where specimen collection and processing are either done or observed by you as the employer</li> </ul>	1910.501(c)-definition of "COVID-19 Test"	<input type="checkbox"/>

# Face Coverings

Questions to Ask	Citation	Status (1-3)
<p>Are you ensuring each employee who is not fully vaccinated wears a face covering when indoors AND when occupying a vehicle with another person for work purposes?</p>	<p>1910.501(i)(1)</p>	<p><input type="checkbox"/></p>
<p>Are you ensuring employees who wear a face covering wear it in such a manner that it fully covers their nose and mouth and is replaced when broken, damaged, soiled, or wet?</p>	<p>1910.501(i)(2)-(i)(2)(ii)</p>	<p><input type="checkbox"/></p>
<p>Are you permitting voluntary use of face coverings, face masks, or respirators for employee who are fully vaccinated unless you can prove it creates a hazard?</p>	<p>1910.501(i)(3)-(i)(4)</p>	<p><input type="checkbox"/></p>
<p>Are you permitting employees to wear a respirator instead of a face covering or face mask whether required to or not AND are you complying with 1910.504 (mini respiratory protection program)?</p>	<p>1910.501(i)(4)</p>	<p><input type="checkbox"/></p>
<p>Do you understand you cannot prohibit customers or visitors from wearing face coverings in your workplace and you are allowed to require face coverings for customers and visitors?</p>	<p>1910.501(i)(5)</p>	<p><input type="checkbox"/></p>

Questions to Ask	Citation	Status (1-3)
<p>Are you reporting work-related COVID-19 deaths to OSHA within 8 hours and work-related hospitalizations within 24 hours upon learning of a death or hospitalization?</p>	1910.501(k)(1)-(k)(2)	<input type="checkbox"/>
<p>Do you have a system in place to supply an employee or their representative the following by the end of the next business day after a request?</p> <ul style="list-style-type: none"> <li>■ Their COVID-19 vaccination documentation</li> <li>■ The aggregate number of fully vaccinated employees at their workplace</li> <li>■ The total number of employees at their workplace</li> </ul>	1910.501(l)(1)-(l)(2)	<input type="checkbox"/>
<p>Do you have a system in place to provide OSHA with the following documentation within 4 hours of receiving a request?</p> <ul style="list-style-type: none"> <li>■ Your written vaccination policy</li> <li>■ The aggregate number of fully vaccinated employees at a location</li> <li>■ The total number of employees at a location</li> </ul>	1910.501(l)(3)(i)	<input type="checkbox"/>
<p>Do you have a system in place to provide OSHA with all other documents and records required by this law by the end of the next business day after receiving such a request?</p>	1910.501(l)(3)(ii)	<input type="checkbox"/>
<p>Do you have a system in place to ensure compliance with all elements of this law except testing requirements for employees who are not fully vaccinated by January 10, 2022?</p>	1910.501(m)(2)(ii)	<input type="checkbox"/>
<p>Do you have a system in place to ensure compliance with COVID-19 testing for employees who are not fully vaccinated by February 9, 2022?</p>	1910.501(m)(2)(ii)	<input type="checkbox"/>

## Reference:

- [Standard 1910.501-Vaccination, testing, and face coverings](#)

## Resources from OSHA:

- [Home page for COVID-19 Vaccination and Testing ETS](#)
- [OSHA ETS FAQ](#)
- Vaccination policy templates (samples of policies that can be copied, customized, and implemented):
  - [Mandatory Vaccination Sample](#)
  - [Vaccination or Testing and Face Covering Sample](#)



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