

*Analysis and Summary of*  
**OSHA 3990-03 2020**  
**Guidance on Preparing Workplaces for COVID-19**

***What is OSHA?***

Occupational Safety & Health Act of 1970

***Why and when did they publish this document?***

- The Act published in 1970 “requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.”
- This particular document focuses on the need for employers to implement “engineering, administrative, and work practice controls and personal protective equipment (PPE), as well as considerations for doing so.”
- This document was originally published in early March (2020).

***Where can I find the full version (35 pages) of this document?***

Go to <https://www.osha.gov/Publications/OSHA3990.pdf> or search for “3990-03 2020” on Google.

***Why is an Architect analyzing this document?***

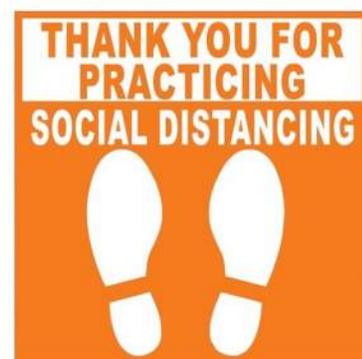
Architects are regularly tasked with designing and renovating workplaces. Our clients have begun to inquire as to what “best practices” they should plan to implement in their offices and customer facing areas as they move to reopen during the current COVID-19 pandemic.

***How does COVID-19 spread?***

Information published in this document as well as statements by the CDC state that COVID-19 is primarily spread by being in close proximity (defined by 6’) of infected individuals. This spread can occur through respiratory droplets from sneezing or coughing. Surfaces can also transmit the virus when individuals touch the surface then touch their face.

***Signage employers should consider posting for staff and public/customers include:***

- Promote frequent and proper handwashing in restrooms.
- Consider promoting use of hand sanitizer upon entry of the facility (if it’s feasible to provide).
- Encourage workers to stay home if they’re sick or symptomatic. Define symptoms of COVID-19.
- Promote respiratory etiquette. Cover coughs & sneezes with the inside of the elbow.
- Promote disinfecting of shared equipment (copiers/tools)
- Promote regular housecleaning practices – disinfecting/cleaning desk and shared surfaces



**Basic physical measures to consider:**

- Provide staff and public/customers with tissues and no touch trash receptacles.
- Consider providing hand sanitizer stations if feasible.
- Provide disposable towels and disinfectant sprays for staff use in cleaning shared work surfaces.
- Provide touch free handwashing station with disinfectant soap and disposable towels in all restrooms



**Engineering controls to consider:**

(According to OSHA, these “engineering controls” are the “most effective” protective measures.)

- Install high efficiency air filters
- Increase ventilation rates in the workplace environment
- Install physical barriers such as sneeze guards where staff must be within 6’ of others
- Install or use a drive-up window for customer service transactions when feasible
- Provide negative air ventilation (recommended for high risk areas such as healthcare facilities)



**Administrative controls** – Kern Architects will not be summarizing or analyzing these measures as they are mostly HR focused (such as maximizing “work from home” strategies and considering working in alternating shifts). We strongly recommend having your HR director read through this section of the OSHA document to see what is most applicable to your staff and workplace.

### **Risk Classifications of Workplaces**

OSHA defines classifications of risk for different industries/workplaces as they pertain to COVID-19. “High” and “Very High” risk classifications are reserved for those in healthcare settings that are regularly in contact with known or likely infectious individuals. This summary is intended for use by businesses and retail environments only. These workplaces would most commonly be classified below the “High” risk classification.

“Medium Exposure Risk” – Defined as having frequent exposure (within 6’ or less) with people who may be infected but who are not known or suspected COVID-19 patients. This may include high volume retail settings, grocery stores, financial institutions and restaurants.

- Recommendations specific to “Medium” risk include:
  - Install physical barriers such as sneeze guards where feasible
  - Keep customers informed using public facing signage (see sign recommendation above)
  - Encourage public/customers to utilize telephone, mobile, internet or drive through transactions when feasible.

“Low Exposure Risk” – Defined as not having frequent close contact (within 6’ or less) with the general public. This is likely to include general office settings where public contact is minimal or infrequent.

- There are no recommendations unique to the “low exposure risk” category. Refer to general measures defined/outlined earlier in this summary.

---

Additional related documents published by the federal government since OSHA 3990 2020 and [what has been changed/added:](#)

### **OSHA 3996-04 2020**

#### **COVID-19 Guidance for Retail Workers**

- “Some worksites have already begun to demarcate six-foot distances with floor tape in checkout lines. Workplaces where social distancing is a challenge should consider innovative approaches, such as opening only every other cash register, temporarily moving workstations to create more distance, and installing plexiglass partitions.”
- “Use a drive thru window or curbside pick-up.”



## **Guidelines for Opening Up America Again**

Published by the CDC and the White House on April 16, 2020

This document includes “Phase Guidelines” for reopening. Below are criteria specific to workplaces, that are unique/new to this document as categorized within each of the defined phases of re-opening:

- Phase One:
  - Close common areas where personnel are likely to congregate and interact.
  - Strongly consider special accommodations for personnel who are members of the vulnerable population.
- Phase Two: Same notes as above from “phase one”.
  - The only changes seem to be that certain types of businesses that were restricted against opening in “phase one” can now open (such as bars).
- Phase Three: Resume unrestricted staffing of worksites.

## **Coronavirus (COVID-19) Pandemic: Addressing PPE Needs in Non-Healthcare Setting**

Published by FEMA on April 22, 2020

This document is focused on addressing the current and anticipated ongoing PPE shortage. Statements pertaining to workplaces not deemed essential include:

- “Do not attempt to acquire medical or industrial use PPE for employees that aren’t required by law or regulation to wear as part of routine duties.”
- CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain.
  - If commercially sourced cloth face coverings are not available, they can be fashioned from common materials at low cost.

---

Overall, there are a lot of similarities and redundancies between the documents being published by OSHA, the CDC, The White House, and FEMA. Each employer and workplace is unique. The documents outlined above create baselines for compliance. Employers should develop their own strategy to implement the recommendations of these federal agencies and consider working with a design professional to determine measures more specific to their physical workplace.

If you would like assistance in implementing “engineering controls”, installation of recommended signage, or development of measures specific to your workplace feel free to contact Phillip Kern with Kern Architects via email at [Phillip.Kern@KernArchitects.com](mailto:Phillip.Kern@KernArchitects.com).

Phillip has practiced in the field of commercial Architecture for the past 15 years. While the industries he has served have been varied, he has specialized in working extensively with banks and credit unions along the gulf coast. In addition to traditional Architectural services, Kern Architects provides turn-key solutions for their clients including coordination of construction and non-construction vendors. Development of turn-key project solutions has resulted in strong relationships with these vendors who will be crucial to timely and cost competitive implementation of the measures described in the summary above.

Disclaimer: This document does not constitute legal advice. It is for informational purposes only and only speaks to the ability of Kern Architects to assist in the implementation of engineering controls and facility changes. Kern Architects is not a law firm and is not qualified to give legal advice. Employers should speak to their attorney(s) if they have any questions concerning compliance with OSHA and/or any other workplace safety laws and regulations.