

Labor and Industries Inspections and COVID-19

Covid-19 has presented a myriad of safety challenges for our members including both resident and employee exposures. Recently, one of our members received a visit from a WISHA (Washington Industrial Safety And Health) inspector specific to employee exposures to Covid-19 at their facility.

Most inspectors visit your sites as a result of an anonymous complaint. You will not know who makes such a complaint. However, when inspectors arrive at your site, they are always looking for documentation of key components of your safety program. These are the same programs we ask for and review during our annual safety visits to your facilities. They include:

- Your written Accident Prevention Program
- Your written Hazardous Communication Program
- Your written Bloodborne Pathogen Program
- Training records for all safety training conducted for your employees
- Monthly Safety Committee Meeting minutes from the past year

Members who have had recent WISHA inspections concerning Covid-19 exposures for their employees, have also been asked for certification that your facility has conducted a PPE (Personal Protective Equipment) Hazard Assessment. (WAC 296-800-16010). The Washington Administrative Code (WAC) indicates you need to document (and certify) your hazard assessment for PPE for your facility. You will find a recommended WISHA form to use for a PPE assessment by clicking the link below:

[https://www.nijc.org/pdfs/Solid%20Waste/Haz%20Assess%20For%20PPE%20\(2\).pdf](https://www.nijc.org/pdfs/Solid%20Waste/Haz%20Assess%20For%20PPE%20(2).pdf)

Unfortunately, most of this generic form is focused on the construction industry. Prior to Covid-19, this was an industry with heavy PPE use, but the guide can still be used to give you examples of the type of exposures you may want to consider.

Covid-19 exposures are also governed by directives you have received from your local Health Departments concerning PPE use in your facility. Sometimes the Health Department directives and WISHA requirements can conflict.

Obviously, Covid-19 is a new territory for WISHA. Due to the high levels of Covid-19 in the senior living facilities in Washington, every facility should be prepared for a potential WISHA inspector visit.

WISHA inspections can result in fines, and in many hours of administrative time to respond to WISHA's multiple documentation requests. By having written safety programs up to date and available for WISHA inspectors, it helps facilitate good outcomes for your site. We are here to help.

For any specific questions about Covid-19, N-95's or other PPE equipment, or your health department directives, please contact Laura Hoffman with LeadingAge Washington at 425-231-4804

For any specific questions about any of the required WISHA written programs above, please contact Cathy Reineke at 425-876-5558.