

Case Study Report

Workplace Compliance with OSHA & CDC Guidelines

During the Covid Pandemic

Andrew M. Perry

HLTC 805 Health Care Management

Granite State College

Dr. Kathleen Patenaude

ABSTRACT

The project is a case report to explore the extent employers are following Occupational Safety and Health Administration guidelines, along with Center for Disease Control and Prevention guidelines to ensure the safety of their employees during the COVID-19 pandemic. The topic was chosen after observing how businesses did not all appear to be doing the same steps to ensure employee safety.

The subject was a production company in the Manchester, NH area. The methods used are the guidelines of Occupational Safety and Health Administration and Center for Disease Control and Prevention and provide a comparison to see how close the company is meeting expectation.

The results and conclusions are not final, but on-going as with changes being made related to the pandemic. A conclusion that can be given thus far in the report is that the company is meeting most expectations.

THE TABLE OF CONTENTS

INTRODUCTION

- AIM OF THE PROJECT
- BACKGROUND
- THE FRAMEWORK
- THE SIGNIFICANCE OF THE PROJECT
- THE REVIEW OF RELEVANT EVIDENCE

METHODS

- METHODS USE TO COMPLETE THE PROJECT
- THE DESCRIPTION OF THE PROJECT DELIVERABLES

PROJECT RESULTS

- PROJECT FINDINGS
- IMPLICATIONS
- CHALLENGES AND ACCOMPLISHMENTS
- STUDY RECOMMENDATIONS

REFERENCES

APPENDICES

Introduction

The COVID-19 pandemic brought anxiety, severe illness, death, and many questions regarding healthcare during the year of 2020 and continuing. The research is drawn on a workplace in greater Manchester in the State of New Hampshire and their compliance with OSHA and CDC guidelines to ensure the safety of their employees.

The workplace which has its home base in Massachusetts with several other facilities in different states. The company made initial decisions based on state mandates for the state of Massachusetts and adjusted for each of their other facilities to follow the individual state mandates and guidelines. This did have some situations as employees that lived in Massachusetts worked in the New Hampshire facilities, so these situations had to be addressed.

One may think that safety protocols were just set into place by the workplace, but there are also procedures that had to take place other than just taking CDC guidelines and enacting safety protocols.

Aim of The Project

The following project is a case study report centered on the COVID-19 pandemic. For this project, research was not conducted in a field-based location, but through examining conversations, visual observations, discussion of employer protocols, and review of OSHA and CDC guidelines. Since this case study report is not field-based research, and to ensure confidentiality, there will not be any identifiable information.

Background

For this case study report and the nature of the topic, one will find that most of the referenced information will come from the Centers for Disease Control and Prevention (CDC) (CDC. 2021) and Occupational Safety and Health Administration (OSHA) (OSHA. 2021).

Korkusuz wrote that the World Health Organization (WHO) declared this disease which spreads rapidly in the world, as an “International Public Health Emergency” on January 30, 2020 and as a pandemic on March 11, 2020. (Korkusuz, Senoglu, Polat, Kart Yasar. 2021).

According to Merriam-Webster COVID-19 is “a mild to severe respiratory illness that is caused by a Coronavirus (severe acute respiratory syndrome Coronavirus 2 of the genus Beta coronavirus) is transmitted chiefly by contact with infectious material (such as respiratory droplets) on objects or surfaces contaminated by the causative virus and is characterized respiratory failure. (Merriam-Webster, 2021).

The CDC has broken down Coronavirus Disease 2019 (COVID-19) as ‘CO’ = corona, ‘VI’ = virus and ‘D’ = disease. COVID-19 caused by a new coronavirus first identified in China. Individuals infected have in some cases have shown mild symptoms, but COVID-19 can cause severe illness and even death. The severe symptoms are seen in the elderly and those who have certain underlying medical conditions such as cancer, kidney disease, chronic lung diseases and neurological conditions. (CDC. 2021)

Now that we have researched the definition of the virus, how does it spread? (See appendix I). In May of 2021, reports were appearing that the virus could be spread through ventilation systems. According to the United States Environmental Protection Agency (EPA),

“lowering the concentrations of indoor air pollutants or contaminants including any viruses that may be in the air is to increase – the amount of outdoor air coming indoors. Ensuring proper ventilation with outside air can help reduce the concentration of airborne contaminants, including viruses, indoors. However, by itself, increasing ventilation is not enough to protect people from COVID-19. When used along with other best practices recommended by CDC and others, increasing ventilation can be part of a plan to protect people indoors.” (EPA. 2020)

The Framework

This pandemic has raised numerous questions that have been asked and still have not been 100% answered. The purpose of this study report stems from the question to what extent are employers following OSHA and CDC guidelines in the workplace specifically related to COVID-19?

The model for this case study report is a production company in greater Manchester, New Hampshire, that employs 450-500 people which includes office staff, and production workers. In the office settings and on the production floor, employees work in limited space. The problem of limited space arises as many offices as possible which are set up for customer service are cubicles right next to each other. On the production floor each department has 15-30 employees working in several cases side by side as they are set up as production lines. Machines are close to each other and due to the side of some units being made barriers cannot be put into place as it would disrupt production and, in some cases, cause other safety issues.

This project is not to find fault with any company protocols, but to look at what steps the company made to ensure the safety of their employees during the pandemic. The research will compare the steps taken to follow OSHA and CDC guidelines through a comparison table. The

findings will be given at the conclusion of the study report along with recommendations that could be used for further use.

The Significance of the Project

Background information included speaking with the Emergency Management and Safety (EMS) Manager for the production company. During our discussions he was able to give me some information related to the steps that the company did take for employee safety during the pandemic. In our first discussion the EMS manager relayed that “the needs of our associates and customers always come first. This includes the health and well-being of every individual who relies on us for supporting our communities, businesses and families” (M. Matthews, personal communication, April 14, 2021).

Due to the nature of the business, the decision was made that they would remain open during the pandemic unless deemed necessary to close due to an outbreak within the facility. This decision was based on financial needs not only for the business, but also for their employees and customers. In the state of New Hampshire, per executive order 2020-08 an extension of executive order 2020-04, some companies were required to close. The order issued by the Governor stated:

“WHEREAS, since March 13, 2020, during the State of Emergency, the Governor issued

Issued orders that, among other things, (i) require public K-12 schools to

Transition to remote instruction and support, (ii) prohibit scheduled gatherings of

10 or more, (iii) require restaurants and bars to transition to take-out and delivery

only, (iv) temporarily prohibit disconnection or discontinuance of certain

services, including public utilities, in the event of non-payment, (v) temporarily prohibit evictions and foreclosures, (vi) dramatically expand access to State unemployment benefits for individuals impacted by COVID-19, (vii) close nonessential businesses and mandate that Granite Staters stay home with limited exceptions, (viii) expand access to Telehealth Services to protect the public and health care providers, and (ix) restrict hotels and other lodging providers to provision of lodging for vulnerable populations and essential workers.” (State New Hampshire, Office of the Governor, 2020. Pg. 1)

The company made the decision to remain open for financial reasons to not only benefit the company, but also their employees and customers. M. Matthews shared a portion of the statement that was issued and given to employees at the time of this decision which was “our company which is based in Massachusetts is a manufacturer and distributor of construction material, deeming us an essential business permitted to continue to operate pursuant to Executive Orders issued by the Governor of Massachusetts and other applicable state and local law. Our company and its owned entities are continuing its operations in accordance with this guidance” (M. Matthews, personal communication, April 14, 2021). As of date the company has seen positive outcomes in production as other companies in the same form of business that did make the decision to close are now having trouble reopening.

Businesses must follow regulations/standards that are set by the OSHA. If businesses do not follow these regulations, they run the chance of fines, loss of licenses, loss of financial assistance, some cases closure and worst-case scenario serious legal action (OSHA.1970).

Therefore, businesses as it relates to COVID-19 would be looking more closely at OSHA regulations.

When speaking with M. Matthews it was discussed at how he looked at both OSHA standards and CDC guidelines. It is important to know and understand that CDC guidelines are just that. CDC guidelines are not legally binding, they set up the criteria for an evolving standard. The CDC and other agencies play a role in implementation of public health laws which are passed by Congress through Federal Regulations (CDC.gov).

We will further research significance later in this report when researching methods of the company by looking at what steps they took in comparison to OSHA standards and CDC guidelines.

The Review of Relevant Evidence

Relevant evidence as it relates to this case report for the scientific evidence was researched and gathered from a couple of resources. The Occupational Safety and Health Administration (OSHA) is an agency under the United States Department of Labor. The mission of the agency along, with the Occupational Safety and Health Act of 1970, OSHA was created by Congress “to ensure a safe and helpful working condition for workers by setting and enforcing standards and by providing training, outreach, education and assistance.” (OSHA.gov.2021.pg. 1)

The CDC mission can be broken down by understanding that their role is 24/7 for which they focus on: “1. Detecting and responding to new and emerging health threats, 2. Tackling the biggest health problems causing death and disability for Americans, 3. Putting science and advanced technology into action to prevent disease, 4. Promoting healthy and safe behaviors

communities, and environment, 5. Developing leaders and training the public health workforce, including disease detectives, and 6> take the health pulse of our nation.” (CDC.gov. 2021, pg. 2)

Further information can be seen in the organizational structure for OSHA and CDC by referring to appendix II & III.

The Centers for Disease Control and Prevention (CDC) is one of the major operating components of the Department of Health and Human Services. CDC’s mission “to protect America from health safety and security threats, both foreign and in the U.S. Whether diseases start at home or abroad, are chronic or acute, curable, or preventable, human error or deliberate attack, CDC fights disease and supports communities and citizens to do the same.” (CDC.gov.2021).

In keeping with ensuring not to use identifiable information related to the company in the case report, I spoke with the EMS manager about who the company is, their mission, and values. In our discussion, he spoke on how the company has established itself as one of the most respected building products corporations that manufacture high-performing, custom-made windows, and doors. The mission of the company is” to be the best and most respected manufacturer of windows and doors by servicing the needs of contractors, distributors, residential and commercial builders, and independent dealers”. (M. Matthew, personal communication, 2021) He went further to discuss that the core beliefs of the company” are that of respect – to take care of associates and foster a culture of respect and safety, partnership – striving to provide a best-in-class experience for the company’s partners and commitment – to be committed to continuous improvement, innovation, and excellence.” (M. Matthews, personal communication, May 13, 2021).

The EMS manager also discussed how during the pandemic there is a process that must be followed as in structural organization. As safety manager, his responsibility was to be fully up to date on federal and state mandates, OSHA, and CDC guidelines as they were related to the COVID-19 pandemic. He then would report to his director for whom would meet with the president and board members/stakeholders of the company to set company protocols to ensure the safety of associates. (M. Matthews, personal conversation, May 13, 2021)

In continuing our discussion, we touched on the stakeholders being the company, employees, and customers. It has shown in the numbers that the decision to stay open during the pandemic was profitable to the company, due to other competing companies having made the decision to close, we were able to acquire additional business. The company in the long run was able to keep staff employed during a period that normally would see layoffs. (M. Matthews, personal communication, May 2021)

Are there any ethical implications that can be drawn from the way that the company made decisions revolving around the pandemic? The American College of Healthcare Executives Code of Ethics although directed specifically to the healthcare industry, parts can be directed or used for any company executive states one “maintain or enhance the overall quality of life, dignity and well-being of every individual, executives have an obligation to act in ways that will merit the trust confidence and respect. Executives should lead lives that embody an exemplary system of values and ethics – one must conduct professional activities with honest, integrity, respect, fairness and good faith in a manner that will reflect well upon the profession and comply with all laws and regulations.” (ACHE. 2021. Pg. 1)

In examining this ethically the company did follow rules and regulations, while also making decisions not specifically for personal gain, but also for the well being of their

employees by setting protocols for safety, staying open to ensure jobs and financial stability for employees for which this exhibits how they are stakeholders.

Methods

Methods Used to Complete the Project

The methods used to complete this case report required examining guidelines and protocols which the company needed to follow to meet state/federal mandates, guidelines that must be followed for safety protocols based on OSHA, and CDC recommendations.

As the researcher for this project, it was compelling as the pandemic was constantly changing, thus guidelines were constantly changing. The methods being shown in the report are those that have been continuously in place throughout the pandemic.

Observing the comparison chart (See appendix IV) OSHA guidelines are the base for what the workplace needs to follow and meet expectations. As I compiled the information collected as saw that there were areas needing improvement or not meeting expectations, I met with the EMS manager to have a further discussion.

In our discussion, social distancing was a topic that needed to be improved on, specifically on the production floor. Due to the nature of the business, the production line, the number of people on the line and the machinery, the 6 feet apart and the use of barriers could not be put into place as it would decrease productivity and cause other safety concerns. (M. Matthews, personal communication, May 2021).

Routine cleaning and what is considered routine cleaning? The EMS manager stated that since the pandemic communal areas (cafeteria/breakrooms, conference rooms) are cleaned twice during business hours. My response to this was what happens during 2nd and 3rd shift? It was reviewed and concluded that on the off shifts there are fewer people in these areas and the cleaning schedule that had been put into place could remain as already set. (M. Matthews, personal communication, May 2021)

We went deeper in this area of cleaning as it relates to where there was infected or potentially infected employee working. You have identified the employee, identified the specific area where they work, what is your next step in cleaning and disinfecting? The procedure per the EMS manager is that the specified area is completely sprayed and wiped down with disinfectant. (M. Matthews, personal communication, May 2021) The cleaning and disinfecting will be further address in the recommendations at the end of the case report. There were no specifics per CDC as to how much disinfecting had to be done, or if the company or department needed to be shutdown for the procedure. The EMS manager did state that if there had been a large outbreak of positive case all at a specific time, the facility would be shutdown for 48 hours for a complete cleaning could be done by a professional cleaning company. (M. Matthews, personal communication, May 2021).

The Description of the Project Deliverables

This project having not been a field-based experience will not be given to the workplace that is depicted in the report. If at some point the EMS manager requests to review findings or recommendations that I have based on our discussions, I will be happy to arrange for a meeting to review and discuss the report.

This project will be presented to Granite State College for the Capstone Requirement for MS in Healthcare Management.

Further deliverables will be shown in the findings, recommendations, and conclusion of this report.

Project Results

Project Findings

The finding of this report shows that the company is required to follow OSHA rules and regulations and recommended to follow CDC guidelines to ensure the safety of employees during the COVID-19 pandemic. In examining, the company followed all regulations to the best of their ability. There are areas that may have been executed differently which will be given in the recommendations of the report.

Implications

The company having met regulations, the implications of the findings are not completely established. The regulations that are set by OSHA are very much set and structured. The pandemic is a health crisis that is still evolving, thus with daily scientific results being made, so are health decisions, CDC guidelines, local, state, and federal mandates – causing changes to be made in the company on a continuous basis.

Challenges and Accomplishments

The biggest challenge that came with this report was narrowing a topic. The COVID-19 pandemic being unknown raised so many questions, caught many off guard leaving people scrambling.

There are still changes happening such as new strains of the virus, vaccination questions and controversy, guidelines protocols being lifted. A challenge for the company will be what protocols will they change or completely do away with.

In speaking with the EMS manager, the health screening has been altered in that there is no longer a registered nurse at the main entrances doing the screening. Are people going to continue to do the screenings on their own? (M. Matthews, personal communication, June 2021)

Further discussion with the EMS manager leads to the required wearing of face masks which as of June 28th will no longer be required by employees that have been fully vaccinated, but those that have not will need to continue to wear face masks and are being asked to schedule appointments to be vaccinated. (M. Matthews, personal communication, June 2021) The challenge with this will those that are not fully vaccinated still wear their mask?

The accomplishments in doing this report were that a great deal was learned about OSHA regulations, CDC guidelines, local, state, federal mandates and most importantly COVID-19.

Accomplishments for the company is that they were able to maintain a running business and succeeded in keeping their employees safe.

Recommendations

It is important to know that these recommendations are not based on finding fault with anything that the company may or may not have done to ensure the safety of their employees during the pandemic, but to be used as suggestions as the pandemic is still continual and for other health crisis that may occur.

1. Health screening stations need to have someone always monitoring them. If there is not going to be a registered nurse like at the beginning, then possible the safety manager or someone designated and trained by the company.
2. Changing the safety mask requirement, do you want to be specific in those who are fully vaccinated. Need to examine how will or can this be monitored. Legally can the company ask for documentation showing that an employee has been vaccinated.
3. The company need to have stricter cleaning protocols for health crisis to go along with any OSHA or CDC guidelines. Department should be completely cleaned if there is an infected person working within the department, not just their specific workstation and tools.
4. Continuous improvement team should review, examine the production floor layout to make improvements on how safety barriers could possibly be introduced into the plan if needed for other health crisis.

This report/project is not ending. The pandemic is continual thus causing the company to make changes on sometimes a daily basis. The company management, employees, health care professionals and individuals in society need to remain vigilant in being safe during the remainder of the pandemic.

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APPENDIX

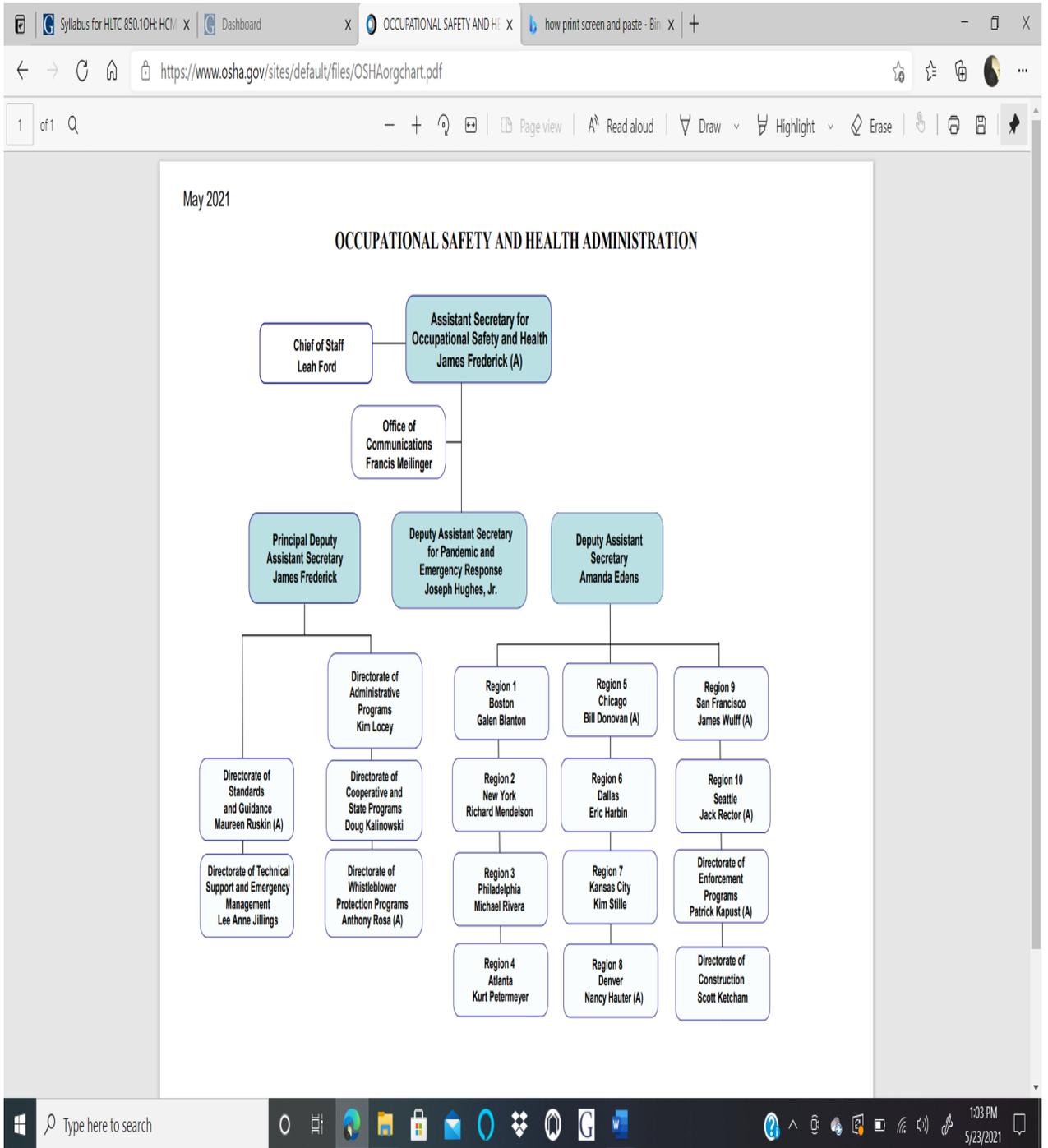
Appendix I.

How It Spreads	How Common is This Type of Spread	How to Protect Yourself
Breathing in droplets or particles		
Breathing in air with small droplets or particles that contain the virus when people are less than 6 feet apart	Common	<ul style="list-style-type: none"> • Get a COVID-19 vaccine as soon as you can • Wear a mask • Stay 6 feet apart • Avoid crowds • Avoid poorly ventilated indoor places
Breathing in air with small droplets or particles that contain the virus when people are far apart or have been in the same enclosed space for more than a few minutes	Uncommon	<ul style="list-style-type: none"> • Get a COVID-19 vaccine as soon as you can • Wear a mask • Avoid poorly ventilated indoor places
Direct splashes and sprays		
By having small droplets and particles that contain virus land on the eyes, nose,	Common	<ul style="list-style-type: none"> • Get a COVID-19 vaccine as soon as you can • Wear a mask • Stay 6 feet apart

<p>or mouth, especially from coughs and sneezes that create sprays and splashes</p>		
<p>Touching eyes, nose, or mouth</p>		
<p>Touching eyes, nose, or mouth with hands that have the virus on them</p>	<p>Uncommon</p>	<ul style="list-style-type: none"> • Get a COVID-19 vaccine as soon as you can • Wear a mask • Wash your hands • Avoid touching your eyes, nose, and mouth before washing hands

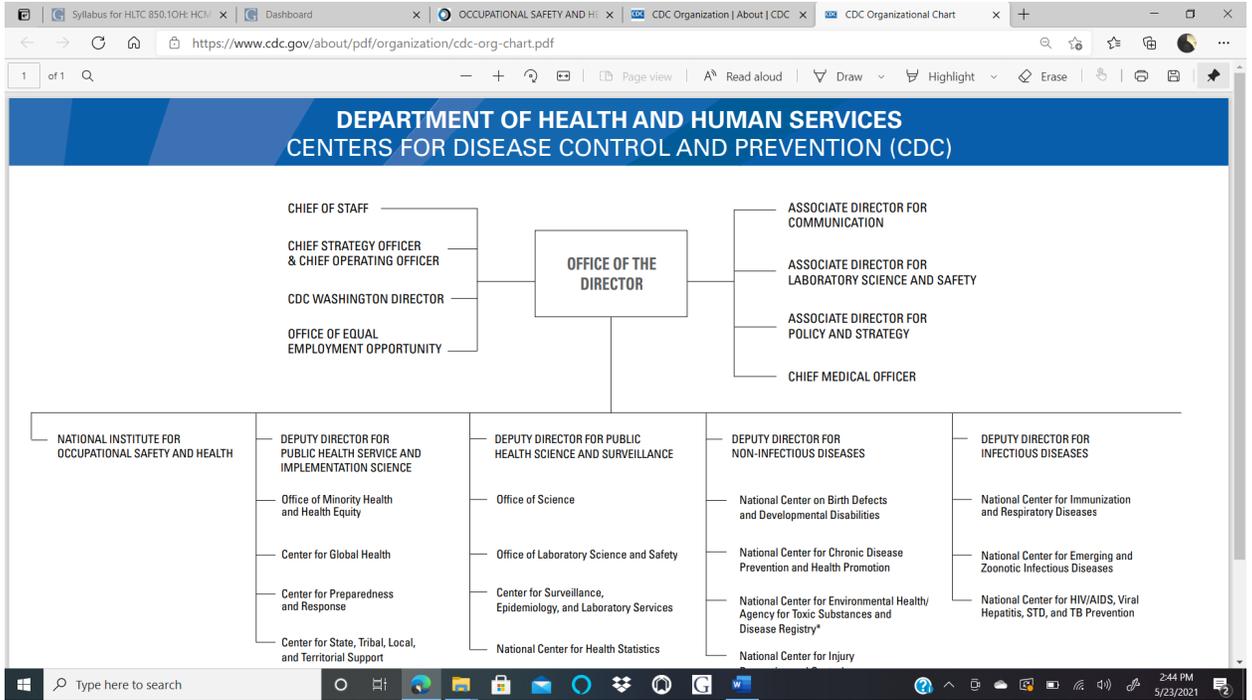
(CDC.gov. 2020)

Appendix II



(OSHA.gov. 2021)

Appendix III



(CDC.gov. 2020)

Appendix IV

Guideline/Protocol Comparison Table

OSHA Guidelines	CDC Guidelines	Workplace Implementation
Eliminating the hazard by separating or sending home infected or potentially infected people from the workplace	Covid-19 Screening Temperature Checks	Covid-19 screening and temperature checks implemented at all entrances. The main employee entrance is staffed with a registered nurse
Implementing physical distancing in all communal work areas	Implementation of social distancing	6 feet social distancing is implemented. Communal areas posted with signs stating number of people allowed in the room. Hallway floors are marked with 6 feet measurement markings for guidance.
Installing barriers where physical distancing cannot be maintained	Not specifically listed	Cafeteria has plexiglass barriers between each seat.
Implementing proper PPE (face covering)	Implementing proper PPE (face coverings)	All must wear face mask to be in the building
Improving ventilation	Not specifically listed	
Availability of necessary supplies for good hygiene practice	Not specifically listed	Additional hand sanitizing stations installed
Routine cleaning and disinfection	Routine cleaning and disinfection	Routine cleaning and disinfection are implemented

(OSHA.gov. 2020)

(CDC.gov. 2021)

(M. Matthews, personal communication, May 2021)

Color scale – Green – meets guideline/protocols

Yellow – needs improvement

Red – does not meet guideline/protocols

