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# Cal/OSHA's New COVID-19 Office Workspace Guidance Offers Cleaning and Distancing Protocols

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By Carmen M. Aguado and Robert R. Roginson







On May 12, 2020, the California Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, issued its COVID-19 Industry Guidance: Office Workspaces, which provides detailed guidance for operating in office workspaces to "support a safe, clean environment for employees" in the face of the COVID-19 pandemic.



On May 12, 2020, the California Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, issued its COVID-19 Industry Guidance: Office Workspaces, which provides detailed guidance for operating in office workspaces to "support a safe, clean environment for employees" in the face of the COVID-19 pandemic. Additionally, Cal/OSHA issued a corresponding checklist.

Similar to other industry guidelines recently issued by Cal/OSHA, the guidance for businesses operating in office workspaces recommends that businesses create and implement worksite-specific COVID-19 prevention plans and regularly evaluate offices to confirm compliance with the plans. Additionally, the guidance suggests that employees be trained on worksite plans and on the importance of handwashing, physical distancing, and the proper use of face coverings. The guidance further recommends that employees and any personnel entering an office workspace receive temperature and/or symptom screenings—as Cal/OSHA has suggested for several industry types. The guidance for office workspaces, however, diverges from Cal/OSHA's other industry guidelines in its recommendations regarding cleaning and disinfecting protocols and in its physical distancing guidelines.

## **Guidance for Office Workspaces**

Cleaning and Disinfecting Protocols

The guidance recommends that businesses thoroughly and regularly clean and disinfect high-traffic areas, commonly used surfaces, and items that must be shared, such as copiers, fax machines, printers, keyboards, and telephones. The guidance advises that employees, to the extent possible, avoid sharing work supplies and equipment. Additionally, the guidance states that employers should require employees to clean and disinfect their personal work areas and provide employees with the necessary cleaning products to do so. The guidance recommends that employers use cleaning products that are approved for use against COVID-19. Finally, per the guidance, employers should consider installing portable air cleaners, upgrading air filters, and "making other modifications to increase the quantity of outside air and ventilation in offices and other spaces."

### Physical Distancing

To ensure physical distancing of at least six feet, the guidance offers businesses the following recommendations:

- "Utilize telework options and modified work schedules."
- "Establish directional hallways and passageways for foot traffic" to eliminate or, at least, minimize the frequency of employees passing by one another.
- "Limit the number of individuals riding in an elevator and ensure the use of face coverings."
- "Utilize work practices ... to limit the number of employees at the office at one time" by, for example, "establishing alternate days for onsite reporting, returning to the office workspace in phases, or continu[ing] use of telework when feasible."

The guidance suggests that when visitors arrive, businesses "[d]edicate staff to direct guests . . . upon entry to [the] office" so that guests do not congregate in lobbies or common areas.

Finally, the guidance recommends that businesses evaluate the necessity of redesigning office spaces (e.g., cubicle areas), decreasing the capacity of persons permitted in conference rooms, and installing "production transfer-aiding materials … to reduce person-to-person production hand-offs" and ensure workspaces allow for six feet between employees.

#### **Key Takeaways**

To ensure a safe and clean workspace for employees, employers may want to review the guidance in its entirety and, as suggested by the guidance, implement additional measures for vulnerable populations.

Ogletree Deakins will continue to monitor and report on developments with respect to the COVID-19 pandemic and will post updates in the firm's Coronavirus (COVID-19) Resource Center as additional information becomes available. Important information for employers is also available via the firm's webinar programs.

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