



Chapter 4

Standards, Guidelines, and Workers' Rights

Chapter 4: Standards, Guidelines, and Workers' Rights

4

Preparing for Delivery

Time

The *Standards, Guidelines, and Workers' Rights* chapter is approximately 3 hours and 30 minutes of classroom training.

Follow the Lesson Plan for a guide to scheduling this course. Time allotments for specific topics are provided within the plan. You may devote more time to classroom and hands-on activities as needed, as the plan reflects the minimum suggested time allotments.

Staffing

The maximum participant – instructor ratio is 25:1.

During classroom activities, the recommended participant – instructor ratio is 10:1.

During hands-on activities, the recommended participant – instructor ratio is 5:1.



Materials Needed

For this chapter, you will need the following:

- A copy of the Infectious Disease Operations Participant Guide (PG)
- A flip chart or whiteboard and markers
- A computer and projector or monitor

The table on the following page lists the materials needed for this lesson.

Chapter 4: Standards, Guidelines, and Workers' Rights

Lesson Overview	Media 	Handouts 
Introduction and Objectives (10 min.)	<i>Slides 1 to 3</i>	
Exercise 1: OSHA Standards for Infectious Diseases (70 min.)	<i>Slides 4 to 5</i>	<i>HO 14: OSHA Standards for Infectious Diseases</i>
Exercise 2: OSHA and CDC Guidelines (30 min.)	<i>Slides 6 to 7</i>	<i>HO 15: OSHA and CDC Guidelines</i>
Exercise 3: Additional Agency Standards and Guidelines (40 min.)	<i>Slides 8 to 10</i>	<i>HO 16: Additional Agency Standards and Guidelines</i>
Exercise 4: OSHA and Legal Rights of Employees (50 min.)	<i>Slides 11 to 12</i>	<i>HO 17: OSHA and Legal Rights of Employees</i>
Summary (10 min.)	<i>Slides 2 to 3</i>	<i>Chapter 4: Things to Remember</i>

Introduction and Objectives

Introduction and Objectives



10
Minutes

Open the lesson by telling participants that in Chapters 1–3, they learned about many of the types of hazards and health effects that exposures to biological agents can pose for workers. Explain that in this chapter, they will learn about specific OSHA regulations, as well as guidelines from other agencies such as the CDC, that help ensure workers’ health and safety on the job.

Display Slides 1 to 3. Introduce the chapter and review the chapter objectives. At the end of this chapter, participants will be able to:

1. Explain applicable OSHA standards for worker protection from infectious diseases.
2. State the definition of *Occupational Exposure* pertaining to the OSHA Bloodborne Pathogens Standard.
3. Explain OSHA requirements for safe treatment and transport of Ebola-contaminated waste.
4. Describe the importance of CDC guidelines for working around infectious diseases.
5. Describe the inter-agency report providing guidance for handling Category A waste.
6. Explain the Cal-OSHA Aerosol Transmissible Diseases Standard.
7. Describe the role of the special permit DOT-SP 16279.
8. Explain the importance of the EPA RCRA.
9. Describe the legal rights of employees under the OSHA Construction Standard.

Invite questions about the objectives.



SL 1 to 3



PG: 4–5 to 4–6

Exercise 1: OSHA Standards for Infectious Diseases

 70
Minutes

Exercise 1: OSHA Standards for Infectious Diseases

Objectives

1. Explain applicable OSHA standards for worker protection from infectious diseases.
2. State the definition of Occupational Exposure pertaining to the OSHA Bloodborne Pathogens Standard.



SL 4 to 5

Display Slide 4. Ask participants about the OSHA standards that they have learned about in previous OSHA-related courses or other training either in class or on the job. Explain that there is no single OSHA standard for infectious diseases, but that OSHA is considering creating a new standard for infectious diseases targeted at workers in healthcare and other high-risk environments.



HO 14: OSHA Standards
for Infectious Diseases

Ask participants which current OSHA standards are likely to be applicable to work in infectious disease environments. Note their answers on the board.



PG: 4-7 to 4-21

Display Slide 5. Explain that these are the primary OSHA standards involved in infectious disease work, and that in this lesson, they're going to look at each of them in more detail.

Divide the class into three groups. Distribute HO14: *OSHA Standards for Infectious Diseases*. Explain that each group will work together to fill out one page of the handout, which focuses on one or more OSHA Standards. Assign one page of the handout to each group.



Flip Chart

Explain that each group will prepare a short presentation about the topic that they've been assigned. Give each group some time to fill out their page of the handout. Tell them they can use pages 4-7 to 4-21 of the PG as a reference if needed. Have them write the main points of their presentation on a sheet of flip chart paper and practice their delivery.

Have each group deliver their presentation to the class. As the other groups are listening, tell them to note the answers to the questions on the other pages of the handout.

Answer any questions that may have come up in the completion of the handout.

Conclude by saying that employers are responsible for making sure that workers are adequately trained in any OSHA standards that are relevant to their work situation, and that on infectious disease worksites, there may be several that apply.

Handout 14: OSHA Standards for Infectious Diseases



Handout 14 OSHA Standards for Infectious Diseases

Group 1

Instructions: Prepare and deliver a presentation about the following:

- Bloodborne Pathogens Standard (29 CFR 1910.1030)
- HAZWOPER Standard (29 CFR 1910.120)
- General Duty Clause (Sec. 5(a)(1))
- Hazard Communication Standard (29 CFR 1910.1200)

Use this space to prepare your notes, or to take notes as you listen to another group's presentation.

Refer to PG pages 4-8 to 4-21 and make sure participants cover the key points.



Handout 14 OSHA Standards for Infectious Diseases

Group 2

Instructions: Prepare and deliver a presentation about the following:

- Personal Protective Equipment (PPE) Standard (29 CFR 1910.132)

Use this space to prepare your notes, or to take notes as you listen to another group's presentation.

Refer to PG pages 4–9 to 4–12 and make sure participants cover the key points.

Handout 14: OSHA Standards for Infectious Diseases (continued)



Handout 14 OSHA Standards for Infectious Diseases

Group 3

Instructions: Prepare and deliver a presentation about the following:

- Respiratory Protection Standard (29 CFR 1910.134)

Use this space to prepare your notes, or to take notes as you listen to another group's presentation.

Refer to PG pages 4-13 to 4-16 and make sure participants cover the key points.

Exercise 2: OSHA and CDC Guidelines



30
Minutes

Exercise 2: OSHA and CDC Guidelines

Objectives



SL 6 to 7

3. Explain OSHA requirements for safe treatment and transport of Ebola-contaminated waste.
4. Describe the importance of CDC guidelines for working around infectious diseases.



HO 15: OSHA and
CDC Guidelines

Display Slide 6. Open the lesson by explaining that, in addition to the OSHA regulations covered earlier, OSHA and the CDC provide additional guidance on a number of topics related to working around infectious diseases.

Display Slide 7. Ask, “Which websites do you think this information comes from – OSHA or CDC?” (Answers: top left and bottom right are from OSHA, top right and bottom left are from CDC.) Ask participants what other kinds of information related to infectious diseases might be available on these sites? Note their answers on the board. Explain that CDC provides information about a wide range of diseases, and that this information is often used by OSHA and NIOSH to create guidance for workers.



PG: 4–22 to 4–23

Distribute HO15: *OSHA and CDC Guidelines*. Read the directions aloud. Point out that one of the words in the box will not be used. Tell participants to complete the handout individually, and then check their answers with a partner. Tell participants to look at pages 4–22 to 4–23 of the PG as a reference.

Check to see that everyone has the same answers. (See the answer key on the following page.) Ask, “Which word was not used?” (agencies) Answer any questions that may have come up in the completion of the handout.

Conclude by saying that there are a number of different government agencies that provide guidance on a number of different infectious diseases and related regulations and best practices, and that they are updated whenever there is new information or guidance available.

Handout 15: OSHA and CDC Guidelines



Handout 15 OSHA and CDC Guidelines

Instructions: Complete the sentences. Use the words in the box. One word will not be used.

agencies	ambulances	biological	cleaning	discarding
generated	health	infection	management	occupational
packaging	regulations	residences	seasonal	sharps

1. There may be regulations for safe treatment, handling, and transport of highly infectious waste, depending on the type of pathogen present.
2. OSHA's fact sheet for *Safe Handling, Treatment, Transport and Disposal of Ebola-Contaminated Waste* includes guidance for creating a waste management plan, obtaining necessary permits for transporting infected waste, and rules for packaging and labeling waste.
3. This guidance begins at the point the waste is generated and continues through final disposal.
4. Infected waste may originate from using and discarding sharps, dressings, and other supplies while caring for or testing samples from a patient with Ebola.
5. Infected waste may also come from cleaning hospital rooms; ambulances, airplanes, and other vehicles; airports and other transportation facilities; people's residences; or other areas with suspected or confirmed Ebola-virus contamination.
6. Removing and discarding disposable PPE after working in an environment with suspected or confirmed Ebola-virus contamination also generates infected waste.
7. In addition to various standards related to infectious disease work, OSHA has published guidance documents for specific diseases such as: seasonal flu, pandemic flu, MRSA, norovirus, SARS, tuberculosis, and additional biological agents, such as anthrax and Ebola.
8. State and local health departments and healthcare facilities use guidelines from the CDC, considered the authoritative source on infectious diseases in the U.S., as a basis for developing infection control programs.
9. CDC guidance is usually not developed specifically for occupational health. NIOSH guidance is specifically focused on worker protection.
10. The CDC does provide guidelines for airline crews, airline cleaning personnel, and cargo personnel in countries with widespread Ebola transmission.

Infectious Disease Operations

Exercise 3: Additional Agency Standards and Guidelines



40
Minutes

Exercise 3: Additional Agency Standards and Guidelines

Objectives



SL 8 to 10

5. Describe the inter-agency report providing guidance for handling Category A waste.
6. Explain the Cal-OSHA Aerosol Transmissible Diseases Standard.
7. Describe the role of the special permit DOT-SP 16279.
8. Explain the importance of the EPA RCRA.



HO 16: Additional Agency
Standards and Guidelines

Display Slides 8 and 9. Open the lesson by explaining that in addition to OSHA regulations and CDC guidance, there are other agencies that provide regulations or guidance on certain aspects of infectious waste operations. Ask participants to try to name what each of the acronyms on the slide stands for.

Display Slide 10 to reveal the answers. Explain that in the next activity, they will be looking at these in more detail.



PG: 4-24 to 4-29

Distribute Handout 16: *Additional Agency Standards and Guidelines*. Read the instructions aloud. Have participants write answers to the questions in small groups. Tell them to look at *PG pages 4-24 to 4-29 as a reference*.

Check the answers with the class. (See the answer key on the following page.) Answer any questions that may have come up in the completion of the handout.

Conclude by saying that depending on what types of tasks are involved in an infectious disease operation, there may be additional regulations that apply. Employers are responsible for ensuring that all application regulations are followed.

Handout 16: Additional Agency Standards and Guidelines



Handout 16 Additional Agency Standards and Guidelines

Instructions: Read each sentence. Write the correct letter.

A = Interim Planning Guidance for Handling Category A Solid Waste
B = CAL-OSHA Aerosol Transmissible Diseases Standard
C = DOT-SP 16279
D = EPA RCRA Regulations

1. B Requires specific protections whether the disease or pathogen requires airborne infection isolation or droplet precautions.
2. C Authorizes the transportation in commerce of waste contaminated with or suspected of being contaminated with the Ebola virus for disposal.
3. C Requires any authorized hauler to ensure that their workers are properly trained on the permit prior to using it.
4. B Requires covered employers to develop a comprehensive exposure control plan for aerosol transmissible diseases.
5. D Protects communities and resource conservation through regulations, guidance, and policies that ensure the safe management and cleanup of solid and hazardous waste, and programs that encourage source reduction and beneficial reuse.
6. A Includes information from agencies such as DOT, OSHA, EPA, and CDC.
7. A Provides an overview of requirements for: healthcare facilities generating highly infectious waste, specialized transportation companies safely hauling the waste, treatment or inactivation recommendations, and final disposal in a landfill.
8. D Are contained in title 40 (Protection of the Environment) of the Code of Federal Regulations (CFR) parts 239-282.
9. A Provides references for worker safety, training, and emergency response so all communities know and understand where to go for the most current information depending on the highly infectious substances being managed.
10. B Establishes engineering and work practice controls to protect employees who operate, use, or maintain vehicles that transport persons who are aerosol transmissible disease cases or suspected cases.
11. C Should also be provided to all generators of highly infectious waste, ideally prior to the start of packaging and pre-transportation activities so that proper packaging techniques are used according to the permit.
12. D Do not govern the management and disposition of regulated medical or highly infectious Category A wastes, but of disinfectants that could be a hazardous waste once they are used.

Infectious Disease Operations

Exercise 4: OSHA and Legal Rights of Employees



50
Minutes

Exercise 4: OSHA and Legal Rights of Employees

Objective

9. Describe the legal rights of employees under the OSHA Construction Standard.



SL 11 to 12



Flip Chart



HO 17: OSHA and
Legal Rights of Employees



PG: 4-29 to 4-37

Display Slide 11. Open the lesson by saying, “We’ve learned a lot about the types of regulations that OSHA has provided to ensure the safety and health of workers around infectious disease operations, but what does OSHA provide in the way of legal rights for workers?” Divide the class into small groups and give each group a piece of flip chart paper. Without looking at their PGs, tell the groups that you’re going to give them one minute to try to come up with the longest list of legal rights that OSHA provides for workers. Start the timer and have groups create their lists. After a minute, have groups post their flip chart papers and compare the groups’ lists. Note the similarities and differences.

Distribute HO17: *OSHA and Legal Rights of Employees*. Read the instructions aloud. Have participants work individually to write notes about workers’ rights next to each topic in the chart. Tell participants that they may look at pages 4–29 to 4–36 of the PG as a reference.

Call on a participant and ask him or her to read the answer to the first item in the chart. Then tell the participant to randomly select the next person to answer the next item, and continue in this way with the rest of the class, ensuring that all participants are called on at least once. (See the answer key on the following page.) Ask participants to raise their hands if they have different answers, and discuss the correct information with the class.

Answer any additional questions that may have come up in the completion of the handout.

Display Slide 12. Explain that according to OSHA, the law requires employers to provide a safe workplace, and to protect you from recognized hazards. However, there is no specific duty that details what an employer must do to protect you from an infectious disease. Ask if participants can explain how FMLA and ADA offer additional protections to workers on infectious disease sites. Tell them to refer to PG pages 4–36 to 4–37 for information and discuss with the class.

Conclude by reiterating that in addition to providing regulations for working around infectious diseases, OSHA provides a number of legal rights to workers, and that it is important for workers to understand and exercise their rights.

Handout 17: OSHA and Legal Rights of Employees



Handout 17 OSHA and Legal Rights of Employees

Instructions: Fill in the chart with details about workers' rights related to each topic, according to OSHA.

Topic	Detail
1. Abatement period	Employees have the right to contest the abatement period.
2. Dangerous work	Employees have the right to refuse dangerous work.
3. Discrimination complaint	Employees have the right to file a discrimination complaint.
4. Employee representative	Employees have the right to have an individual to represent them with various health and safety issues.
5. Form 300	Employees have the right to review Form 300.
6. Hazard information	Employees have the right to request information from the employer on safety and health hazards in the workplace.
7. Imminent danger	Employees have the right to report imminent danger.
8. Medical and exposure records	Employees have the right to access medical and exposure records.
9. Monitoring and results	Employees have the right to observe monitoring and examine results.
10. NIOSH	Employees have the right to contact NIOSH.
11. OSHA compliance officer	Employees have the right to help the OSHA compliance officer.
12. OSHA inspection	Employees have the right to request an OSHA inspection.
13. OSHA rights	Employees have the right to exercise their OSHA rights without fear of retaliation.
14. Safety or health hazards	Employees have the right to report safety or health hazards.
15. Standard variances	Employees have the right to have knowledge of standard variances.
16. Standards and regulations	Employees have the right to review standards and regulations.

Infectious Disease Operations



10
Minutes

Summary

Distribute *Chapter 4: Things to Remember.*

Explain that the *Things to Remember* document is a take-home list of information that can be used for reference or self-study. Note that this document provides information about the chapter's learning objectives and may be used as a study guide for the end-of-course assessment.

Display Slides 2 to 3 and briefly review the chapter objectives with the class. Review the information on the *Things to Remember* handout for each objective. Ask participants if they are comfortable with their knowledge about, or ability to do, each of the objectives, or if they need review or additional support on any of the items listed.

Ask the participants if they have any questions regarding any other topics of the chapter.

Address any questions or concerns.



Chapter 4:
Things to Remember



SL 2 to 3



PG: 4-38 to 4-39

Chapter 4: Things to Remember



Chapter 4: Standards, Guidelines, and Workers' Rights Things to Remember

1. Employers must follow all OSHA standards that apply to their scope of work. The following standards and directives are directly applicable to protecting workers against the transmission of infectious agents:
 - Bloodborne Pathogens Standard (29 CFR 1910.1030)
 - Personal Protective Equipment (PPE) Standard (29 CFR 1910.132)
 - Respiratory Protection Standard (29 CFR 1910.134)
 - Hazardous Waste Operations and Emergency Response (HAZWOPER) Standard (29 CFR 1910.120)
 - General Duty Clause (Sec. 5(a)(1)) of the Occupational Safety & Health Act
 - Hazard Communication Standard (29 CFR 1910.1200)
2. Occupational exposure means a reasonably anticipated skin, eye, and mucous membrane contact with blood or other potential infectious material that may result from the performance of an employee's duties. The OSHA Bloodborne Pathogens Standard requires an exposure determination that includes development of a list of job classifications and tasks that have reasonably anticipated exposure. It also requires that all blood and body fluids and other potentially infectious material be treated as potentially infectious.
3. In 2014, OSHA published guidelines for Ebola in the wake of the outbreak that occurred that year. Safe handling, treatment, transport, and disposal of waste that is suspected or known to be contaminated with Ebola virus begins at the point the waste is generated (that is, the point of origin), and continues through final disposal. Guidance includes the following:
 - Take steps to minimize solid and liquid waste.
 - Identify a complete chain for waste handling.
 - Create a waste management plan.
 - Place materials in double, leak-proof bags and store in rigid, leak-proof containers.
 - Follow DOT guidance for packaging.
4. The Centers for Disease Control (CDC) guidance is considered the authoritative source of information on infection control in the U.S., and is a major contributor in controlling infectious disease worldwide. State and local health departments and healthcare facilities use CDC guidelines as a basis for developing infection control programs. Typically, the CDC's website has information on transmission, risk of exposure, prevention, protection of healthcare and laboratory workers, diagnosis, outbreaks, and treatment.
5. *The Interim Planning Guidance for Handling Category A Solid Waste* is a consolidated overview of regulations, which provides information and guidance on the proper management and handling of waste materials. The inter-agency report describes on-site and off-site inactivation of Category A biological agents, as well as engineering and administrative controls, PPE, and worker training recommended for working with Category A waste and inactivated waste.

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Chapter 4: Things to Remember



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Things to Remember

6. The CAL-OSHA Aerosol Transmissible Diseases (ATD) Standard requires covered employers to develop a comprehensive exposure control plan for ATDs. While only mandatory in California, the standard serves as a model for the nation. The written exposure control plan includes:
 - Establishing engineering and work practice controls to protect employees who operate, use, or maintain vehicles that transport persons who are ATD cases or suspected cases.
 - Providing written decontamination procedures for the cleaning and decontamination of work areas, vehicles, personal protective equipment, and other equipment.

Employers in California must provide the protections required by Section 5199 of the ATD Standard according to whether the disease or pathogen requires airborne infection isolation or droplet precautions.

7. DOT-SP 16279 is an Ebola-specific special permit, released by the Federal Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA), which allows for different sizes of packaging to accommodate larger volumes of contaminated waste.
8. The EPA Resource Conservation and Recovery Act (RCRA) deals with the proper management of waste materials, specifically those wastes that are considered a hazardous waste under these regulations. This may include materials that are listed specifically by the EPA as a hazardous waste, or those that may exhibit characteristics as specified in the regulations. It is important to keep RCRA regulations in mind when dealing with wastes generated at an infectious waste-contaminated site.
9. Under the OSHA Construction Standard, employees have many legal rights on the job site. Employees have the right to:
 - Have an employee representative.
 - Review standards and regulations.
 - Access medical and exposure records.
 - Request safety and hazard information.
 - Request an OSHA inspection.
 - Help the OSHA compliance officer.
 - Contest the abatement period.
 - Contact the National Institute for Occupational Safety and Health (NIOSH).
 - Report imminent danger, and safety and health hazards.
 - Refuse dangerous work.

