COVID-19 VOSHA Employee Training Required May 2020

April 27, 2020 – In accordance with Governor Scott's April 24 expansion of the phased restart of Vermont’s economy [1], the Vermont Occupational Safety and Health Administration (VOSHA) and the Vermont Department of Health have released a training to help employers meet the new requirement for all employees [2] who return to work to receive specific training about COVID-19 by May 4, 2020 or when they first return to work.

Related resources from PACIF Loss Control include Employer Resources for Phased Reopening of Workplaces [3] and Municipal COVID-19 Work Plan Template [4].

All employers must provide either the VOSHA training or similar training that includes all of the topics outlined in VOSHA’s version. VOSHA's training (1) combines much of the information and guidelines already released by the CDC into a single training source and (2) can be taken online by individual employees or printed out and completed manually. People using the online version can take the training, open and read the included links of related information, and print out their own certificate of completion at home or in a work setting. The printable version is longer because it includes the linked information as additional pages.

Employers have the option to summarize the VOSHA training program and provide the same content in a way to that works for them. In general, group trainings should be avoided in order to maintain physical separation.

Key Training Elements

The required training generally covers the following topics.

- An overview of what COVID-19 is, its history, and its current prevalence

- How COVID-19 is spread

- Signs and symptoms of infection
What to do if someone is exposed, along with diagnosis and treatment guidance

A description of the occupational exposure risks, including established levels of risk for different types of employees

Communication of mandatory requirements for businesses/employers

Specific guidance for employers and employees

Resources and links for more information

Analysis

Many or all of the first responders who have been working throughout the shutdown period may already have received some type of training in these topics. If that training has been documented and includes all of the topics covered in the VOSHA training module, then no additional COVID-19 training is required – unless required by other VOSHA standards. For example, where personal protective equipment (N-95 masks, eye/face protection, gowns, etc.) is required, employees must receive appropriate training to use these items properly. Respirators, if required, must be fit-tested, and employees must receive VOSHA-required medical evaluations prior to their use.

For employees who are not first responders, the easiest way to fulfill the training requirement is to use the training program provided on the VOSHA website and document this training with the printable course completion certificate.

Compliance

If VOSHA visits a work site, they will evaluate employer compliance by looking for documentation that employees have completed the required training. In addition, they will determine whether the employer is complying with the requirements of closing common areas, routinely disinfecting surfaces of high use facilities and objects, posting signage at workplace entrances, and ensuring employee physical separation and use of non-respirator masks (or respirators for high-risk employees).

We encourage municipalities to use the training that VOSHA has provided. Any PACIF member with specific training questions about COVID-19 compliance requirements should contact their loss control consultant or email losscontrol@vlct.org for assistance.

Links