# **Covid-19 Log Update**

Provided by IRMS/ICT December 2023

The following information was obtained by IRMS/ICT's contact at OSHA in regards to the COVID-19 Log. **OSHA's requirement to keep and maintain a COVID-19 Log is still in place.** 

#### Information Received from OSHA Safety & Compliance Officer

"I checked with our Regional Office Enforcement Programs person, and there does not appear to be anything on the horizon to change OSHA's COVID-19 log and reporting provisions, 29 CFR 1910.502(q)(2)(ii), (q)(3)(ii)-(iv), and (r)."

## 1910.502(q)(2)

**Required records.** Employers with more than 10 employees on the effective date of this section must:

## 1910.502(q)(2)(ii)

Establish and maintain a COVID-19 log to record each instance identified by the employer in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work.

# 1910.502(q)(2)(ii)(A)

The COVID-19 log must contain, for each instance, the employee's name, one form of contact information, occupation, location where the employee worked, the date of the employee's last day at the workplace, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.

#### 1910.502(q)(2)(ii)(B)

The information in the COVID-19 log must be recorded within 24 hours of the employer learning that the employee is COVID-19 positive and must be maintained as though it is a confidential medical record and must not be disclosed except as required by this ETS or other federal law.

#### 1910.502(q)(2)(ii)(C)

The COVID-19 log must be maintained and preserved while this section remains in effect.

## Note to paragraph (q)(2)(ii):

The COVID-19 log is intended to assist employers with tracking and evaluating instances of employees who are COVID-19 positive without regard to whether those employees were infected at work. The tracking will help evaluate potential workplace exposure to other employees.

# 1910.502(q)(3)

**Availability of records.** By the end of the next business day after a request, the employer must provide, for examination and copying:

#### 1910.502(q)(3)(ii)

The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee.

#### 1910.502(q)(3)(iii)

A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee's positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all of the following: Any employees, their personal representatives, and their authorized representatives.

## 1910.502(q)(3)(iv)

All records required to be maintained by this section to the Assistant Secretary.

Note to paragraph (q):

Employers must continue to record all work-related confirmed cases of COVID-19 on their OSHA Forms 300, 300A, and 301, or the equivalent forms, if required to do so under 29 CFR part 1904.

"As the infections have been going up again, I don't expect to see the requirements dropped."

If you have questions please contact Mike Benedeck at 630-276-5646 or Deidre Harris at 630-276-5414 and we will be glad to assist you.