

# NOW & NEXT

OSHA Alert

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## Employer guide to preparing for emergencies, natural disasters, and catastrophic incidents

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### Workplace emergencies: Are you prepared?



#### What's the Impact

- / Under fed/OSHA and state OSH plans, most employers are required to have an Emergency Action Plan (EAP) to address potential workplace emergencies.
- / EAPs should address potential hazards specific to the workplace and location.
- / Employers should also inform and train employees on related safety plans and procedures.

This winter, many parts of the country have been enduring extreme weather—including rain, snow, or tornados. In addition, the past two years have also shown us that emergencies and disasters may strike anytime and anywhere. Whether a pandemic, natural disaster, heat risks, or workplace violence, all create workplace safety concerns and hazards. Advance planning for an emergency incident plays a vital role in ensuring that employers are prepared for and have the resources to proactively respond when an emergency occurs.

This guide is designed to help employers plan for emergencies and protect their employees.

#### Drafting an Emergency Action Plan

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Most employers are required to have an emergency action plan (EAP) pursuant to the federal Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1910.38. An EAP must include, at a minimum:

- / Procedures for reporting a fire or other emergency
- / Procedures for emergency evacuation, including type of evacuation and exit route assignments
- / Procedures for employees who remain to operate critical plant operations before they evacuate
- / Procedures to account for all employees after evacuation
- / Procedures for rescue or medical duties
- / The name or job title of every employee who may be contacted for more information about the plan or an explanation of duties under the plan

In addition to these minimum requirements, EAPs should also address the types of potential hazards specific to each workplace and location, as well as event-specific considerations to which a workplace may be susceptible.

## Event-specific Considerations:

### *Natural Disasters/Extreme Weather Events*

Every EAP must address what to do in the event of a natural disaster. Specifically, employers should address the critical phases of disaster planning: prevention and response and recovery. Below are steps to assist employers in this process:

### *Prevention & Response*

- / **Survey the workplace:** Review each site/facility and determine the types of natural disasters that may impact the workplace
- / **Job hazard analysis:** Prepare a job hazard analysis (JHA) listing each potential hazard and steps used to eliminate or minimize each hazard
- / **Abatement:** Abate or control reasonably feasible risks
- / **Procedure development:** Develop safety procedures specific to each type of potential natural disaster, including any practical steps to protect employees and equipment
- / **Insurance coverage:** Review and update insurance coverage as needed
- / **Training:** For an EAP and other procedures to be effective, employers must train management and employees on the plan and all response steps  
During trainings, employers should make sure to identify whether the plan is to shelter in place or evacuate, how to secure critical equipment and materials, and, finally, when to

disengage and turn off critical equipment.

### *Recovery*

During the recovery phase, consider the following to safely return to work:

- / When and how to activate additional security
- / Steps to follow for the safe re-start of critical equipment
- / Coordinate with insurance agents and carriers
- / Review what worked and what didn't and amend the EAP and other procedures, and re-train employees, accordingly

For winter-specific considerations, fed/OSHA has recently released a [Winter Weather](#) hazard assessment page to help employers identify and mitigate cold-weather hazards.

### *Pandemics and Other Public Health Emergencies*

Although not expressly required by fed/OSHA standards (yet . . .), all employers should have a broadly written communicable illness policy.

These policies should include the following:

- / Overview of covered illnesses
- / Employee illness reporting obligations
- / Reference to the employer's sick leave and disability accommodation policies
- / Reference to any other benefits available to sick employees
- / Description of the employer's policies regarding potential travel restrictions during outbreaks
- / Description of how the employer will communicate with employees in the event of an outbreak
- / Description of what the employer will do to keep abreast of developments during an outbreak

Employers should stay abreast of current requirements and guidance from the Centers for Disease Control and Prevention (CDC), Equal Employment Opportunity Commission (EEOC), fed/OSHA, and state and local requirements. It's also important to update policies and practices, remote and hybrid work options, paid-time-off (PTO) and sick-time use requirements, isolation and quarantine guidelines, and other accommodations options regularly.

Employers should also be aware of state-plan states that may have applicable regulations, such as Cal/OSHA's Aerosol Transmissible Disease (ATD) standard 8 CCR 5199.

## **Heat Risk & Illnesses Prevention & Response**

Exposure to extreme heat can result in occupational illnesses and injuries, including heat stroke, heat exhaustion, heat cramps, heat fatigue, or heat rashes, each of which can impact employee and workplace safety.

If your workplace is subject to heat risk, employers should consider implementing the following:

- / Engineering controls—These include improving ventilation, air cooling/air conditioning, other measure to reduce temperature by removing heat (and humidity) from the air, and heat conduction blocking, including insulating hot surfaces and changing surfaces to conduct less heat.
- / Administrative controls—These should allow for frequent water breaks, providing well-shaded recovery/rest areas, and, when possible, scheduling hot jobs during cooler hours/seasons.

Employers should also consider whether a reduction in physical demands, the use of relief/extra workers, and/or external work pacing could provide needed relief and maintain productivity, while also working to ensure that workers are not impacted by heat risks.

Employers should also consider implementing a heat stress training program. This program should include the following:

- / Identifying and understanding heat hazards in the workplace for each position
- / Educating employees about heat illness and how to avoid it
- / Recognizing predisposing factors, danger signs, and symptoms
- / Providing first aid training and equipment for heat illness response
- / Providing protective clothing and equipment (PPE) when needed and/or required
- / Requiring regular rest periods and providing cool recovery/rest areas with water

Employers should also note that some states, such as California and Oregon, have their own applicable heat illness regulations which must be followed for workers in those states.

## Workplace Violence Prevention & Response

According to fed/OSHA, workplace violence (WPV) includes any act of violence or threat of violence that occurs in a place of employment.

Given the rise in workplace violence throughout the country, employers should consider whether their workplace is at risk and take the following steps:

- / Identify WPV risks and trends in the workplace
- / Eliminate or address/control risks

- / Prepare a WPV prevention plan
- / Train employees on risks and safety plan
- / Mandate internal reporting
- / Apply case-by-case strategy

## Emergency Preparedness Major Takeaways

- / Have an EAP and hazard-specific plan(s)/program(s) in place for identifying, evaluating, correcting/mitigating workplace hazard(s)
- / Stay abreast of federal and state OSHA requirements, CDC guidance, and EEOC implications
- / Provide training and communications on EAP and related safety plans
- / Regularly re-evaluate and revise EAP policies and plans
- / Provide resources to support management and employees

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