

Recent news that a woman with Ebola traveled to Ohio has led many Ohio schools to close out of an abundance of caution to clean entire buildings, classrooms or school buses. Although these steps promote the health and safety of students and staff, it is important for schools to have protocols in place to specifically protect the employees tasked with doing the cleaning.

The Occupational Safety and Health Administration (OSHA) oversees workplace safety issues across the country. Although schools are not bound by OSHA regulations, it is good practice to follow the agency's procedures and be able to assure employees and the government that all cleaning was done in accordance with OSHA guidance.

As the Center for Disease Control (CDC) has noted, Ebola is a virus spread through bodily fluids and is not contagious until a patient begins to display symptoms (which can happen between two and 21 days after exposure to the virus). Symptoms include fever, muscle pain, vomiting and severe headaches. The CDC has posted [extensive information](#) about the virus and how it is spread.

OSHA has several regulations that apply to decontamination efforts, and two that are of particular importance for schools. To the greatest extent possible, schools should try to make sure these protections are in place for employees who may come into contact with the virus:

- [Bloodborne Pathogens standard](#): Ebola qualifies as a bloodborne pathogen, therefore covered employers are required to put plans in place to minimize employees' exposure. Easy ways to minimize risk are providing readily accessible hand-washing facilities, antiseptic hand cleanser and clean towels. Employees should be encouraged to wash their hands immediately after coming into contact with any bodily fluid. Employers should also provide sealed containers to dispose of any material that has come into contact with bodily fluids.
- [Protective equipment](#): Employers should provide personal protective equipment that prevents infectious material from reaching employees' clothes, skin, eyes or mouth. For protection against Ebola, OSHA recommends employees wear gloves (possibly two sets for extra protection), fluid-resistant or fluid-impermeable gowns, goggles or face shields, and facemasks that cover the nose and mouth. Employers can take further precautions by also providing shoe coverings, or providing sleeve and leg coverings instead of full gowns.

OSHA has also published guidance on cleaning and decontamination for non-healthcare work environments. Schools should make sure their employees are trained on proper cleaning procedures for the virus, including:

- Covering spills with paper towels or another absorbent material and pouring on enough disinfectant to saturate the area, allowing it to soak into spills for at least 30 minutes before wiping it away.
- Treating the contamination itself with disinfectant, removing the contamination and then disinfecting the surface again.
- Ensuring there is adequate ventilation in any areas where employees are using disinfectants. If necessary, [make sure workers are trained](#) on how to protect themselves against chemical hazards.
- Using tools (such as tongs) instead of hands to clean as much as possible.
- Double-bagging contaminated materials.
- Avoiding cleaning techniques (like pressurized air or water) that may spread the virus or turn it into particles that could be inhaled.

When employees are finished cleaning an area, they should remove first their gloves, then their face shield or goggles, gown and mask. Schools should make sure employees wash their hands immediately after cleaning with either soap and water or alcohol-based hand gel.

Further details on OSHA recommendations and safe cleaning procedures are available in [the OSHA guide](#). If you have any questions about these procedures or about how to ensure you comply with OSHA regulations, please contact your principal Squire Patton Boggs lawyer or one of the individuals listed in this alert.

## Contacts

### W. Michael Hanna

T +1 216 479 8699

E [mike.hanna@squirepb.com](mailto:mike.hanna@squirepb.com)

### Tara A. Aschenbrand

T +1 614 365 2713

E [tara.aschenbrand@squirepb.com](mailto:tara.aschenbrand@squirepb.com)

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