Don't Let the Heat Give Your Employees The Summertime Blues: Tips For Avoiding Heat Stress When Wearing COVID-19 Face Coverings

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Summer is almost here, and it is time for employers to focus on heat-related hazards. As Alan Jackson once sang, "that sun is hot and that old clock is moving slow, and so am I." Employers may be wise to heed Alan's advice and instruct their employees to move a little slower, take a few more breaks, and hydrate more often given the potential additional risk posed by face coverings used in the workplace to combat COVID-19.

Heat-Stress Guidance And Considerations

The federal Occupational Safety and Health Administration (OSHA) does not have a specific heat-stress standard, but the General Duty Clause of the Occupational Safety and Health Act requires employers to provide a place of employment that is "free from recognizable hazards that are causing or likely to cause death or serious harm to employees" – including heat-related hazards. State OSHA plans such as California, Washington, and Minnesota have adopted specific heat-stress standards, so employers in those states should consult those standards and ensure they maintain compliance.

Federal OSHA has issued various Standard Interpretation letters regarding heat stress in the workplace. In a May 2010 Standard Interpretation Letter, OSHA provided methods of abating heat-stress hazards in workplaces, including the following:

1. freely allowing workers to drink water or cold liquids (e.g., sports drinks);
2. establishing a work/rest regimen that reduces exposure time to high temperatures and decreases the work rate; and
3. developing an overall heat-stress program.

Use Of Facial Coverings To Combat COVID-19

In response to the COVID-19 pandemic, OSHA issued its Guidance on Preparing Workplaces for COVID-19. The Guidance reiterates that employers must supply workers with effective personal-protective equipment (PPE) to protect against exposure to COVID-19 and perform an assessment of their workplace to determine what types of PPE will be necessary to protect against exposure. Such PPE may include masks, face shields, gloves, and in some cases respirators. As with heat stress, OSHA does not have a specific standard for COVID-19 or similar infectious diseases. Rather, it is

likely that OSHA could cite employers for a failure to follow accepted protocols and OSHA guidance under the OSH Act's General Duty Clause.

In addition to OSHA, the Center for Disease Control (CDC) recommends the use of a cloth-type face covering to slow or prevent the spread of COVID-19. The CDC recommends that the mask include multiple layers of fabric to ensure efficacy. Additionally, most state and local health authorities have also implemented similar recommendations or requirements for the use of cloth-type face coverings to slow the spread of COVID-19.

Face Coverings And Increased Risk of Heat-Related Issues

Some medical experts are beginning to sound the alarm about the potential risks associated with wearing cloth-type face coverings in warmer weather. Medical professionals have warned that wearing masks during hot and humid summer months can make it difficult for air to reach a person's lungs, causing the person's respiratory muscles to activate, resulting in shortness of breath.

This bodily reaction can cause heat to build up more quickly within the body. Moreover, wearing a mask typically causes a person to take more frequent breaths and some experts have warned that strenuous or vigorous physical activity should be avoided.

Tips For Preventing Heat Stress And COVID-19 Exposure

Employers trying to combat heat-stress risks for employees wearing face coverings may encounter additional challenges given the rise in body temperature that may be associated with wearing a mask. If employees are working in an office-setting, air conditioning may be a feasible option to lower the risk of heat exposure.

Employers whose work is primarily outside and labor-intensive face significant challenges. These employers should follow OSHA's typical heat-stress guidance in a more robust and frequent manner. For example, employers should consider the following:

1. a greater number of, and more frequent, break periods to avoid employees developing heat-stress and heat-related illnesses;
2. allowing employees to return to their vehicles to sit in air conditioning during their breaks, or if such an option is not available, creating a shaded environment for breaks;
3. employers may also suggest that employees remove their masks during secluded breaks (such as a break in a personal vehicle) to permit the employee to breathe freely and potentially lower their core temperature (as long as local and state guidelines are followed);
4. employers may also consider the feasibility of starting the workday earlier in the morning or later in the evening to avoid working during peak temperatures and humidity;
5. provide a readily-available supply of masks so that employees can change out sweat-soaked masks for clean and dry masks which may have greater breathability; and

6. consider providing work clothing that is both breathable and wicking in nature.

Conclusion And Takeaways

Most employers will face additional considerations related to heat-stress exposure this summer given that many, if not most, employees will be wearing face coverings to combat COVID-19. Employers will want to ensure they perform the proper hazard assessment and take appropriate steps to reduce employee exposure. Otherwise, employees may suffer from heat-related illnesses or decide that rather than work it is "5 o'clock somewhere."

Employers who have questions regarding best practices or methods to reduce heat-related exposure amidst the challenges of COVID-19 should contact their trusted safety professionals and legal counsel for additional guidance.

For more information, contact the authors here or here.

Related People

Curtis G. Moore
Partner
704.778.4179
Email

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