

OSHA Testing and Vaccination Reporting: Best Practices for Impacted Employers

Recommendations for Meeting the Latest COVID-19 Workplace Rules

Overview

This document outlines current best practices for addressing the Occupational Safety and Health Administration's [Emergency Temporary Standard \(ETS\)](#) for COVID-19 workplace testing and vaccination. These new rules apply to any private sector business that employs more than 100 employees as outlined in the [OSHA ETS](#).

Notice / Disclaimer

This document contains general guidelines consistent with information made publicly available by OSHA as of the date of publication. Health advisories may be updated frequently and may have changed since the creation of this overview. This document is provided as a courtesy, is not legal advice, and is provided without any obligations to issue updates or correct any content errors or inaccuracies. Color disclaims any liabilities or losses arising from or related to any use of or reliance on this information.

These guidelines are not medical advice. Nothing in these guidelines should be interpreted as giving medical advice or as a recommendation regarding any act or omission regarding the health of anyone working or attending a test site. Review the [Color COVID-19 Terms of Service](#) for more information.

Major OSHA ETS components and in-effect dates*

Requirement	What does it entail?	How does OSHA verify?	What must employers capture?
Proof of COVID-19 vaccination by Jan. 10th, 2022	Employers must capture and manage COVID-19 vaccination status for each employee.	A roster of all employees and their vaccine status made available to OSHA by request.	Either physical or virtual proof must be captured and managed per employee, or a signed letter of attestation if the employee lost their physical proof.
Requirement	How often?	Who pays for it?	What test types are allowed?
COVID-19 testing for unvaccinated by Feb. 9th, 2022	Weekly for in-person employees, or within 7 days before returning to work.	OSHA does not require employers to cover the cost of employee tests.	Any FDA Emergency Use Authorized (EAU) lab- based or rapid test which is not both self-administered and self-read.

*Review the [Emergency Temporary Standard](#) for the full list of requirements.

Key considerations for workplace testing compliance



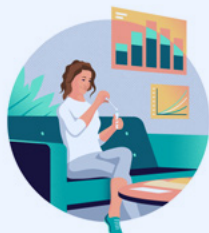
Proof of Vaccination

- How will you capture proof of vaccination?
- Can your employees upload a vaccine card photo?
- Can you monitor both vaccinated and unvaccinated staff?
- How do you plan to share results for proof of compliance?
- Do you accept attestations in lieu of lost vaccination cards?



Workplace Testing Protocols

- What is your eligibility process for who needs to be tested?
- Can you track employees who don't have workplace emails?
- Do you have employees who need at-home tests?
- Do you have a reliable supply of appropriate and approved tests?
- Do you have a scalable approach to support hybrid or dispersed employees?



Compliance Tracking

- How will you be notified of completed testing?
- How will you remind employees who fall out of compliance?
- What protocols do you have for those who test positive?
- Is your solution HIPAA compliant and secure?
- How will you manage and show proof of vaccinations and workforce testing?

Meeting the new testing and compliance rules with Color

Requirement	What is required?	Benefits with Color
Weekly Testing	Employers need to provide weekly testing for unvaccinated employees and have a process in place for identifying positive results.	Color offers a comprehensive and easy to setup testing solution that supports on-site and at-home tests, with compliance reminders for those who forget to test.
Proof of Vaccination	Employers must collect and keep vaccination status records of all employees, and manage proof via photo or signed attestation.	Color's software provides simple vaccination status reporting and upload photo proof, with the ability for employees to attest if they have lost their card.
Result Reporting	Employers must be able to produce test results for all employees at OSHA's request.	Dashboards make test results easy to manage and report at both the individual and aggregate level.
Testing Modality	Employers can use any FDA EAU lab-based or rapid test, but the modality cannot be self-administered and self-read.	Color has reliable lab-based testing supply across the U.S., also supports rapid modalities, and offers flexible software to support compliance with OSHA workflow guidance.

Why work with Color for testing and vaccination status reporting?

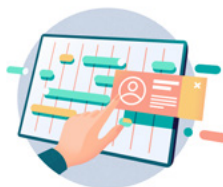
Speed to launch



Reliable test supply



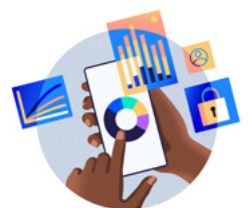
Minimal overhead



Designed for compliance



Scalable across the U.S.



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Color is a leader in distributed healthcare services and clinical testing. We partner with schools, government agencies and private sector employers including Harvard and the Morehouse School of Medicine on proactive testing, the Teamsters Union, Takeda and Salesforce on distributed workforce testing, Thermo Fisher Scientific on K-12 testing nationally, the Commonwealth of Massachusetts on vaccination software, and the National Institutes of Health on the million-person *All of Us* Research Program.

Color.com/OSHA