

# Electronic Alert

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## OSHA Reverses Guidance on Recording Adverse Reactions to COVID-19 Vaccination

By Wilson Jarrell

The Occupational Safety and Health Administration (OSHA) recently updated its guidance on when employers need to record adverse reactions to COVID-19 vaccines. In a reversal of the guidance it issued back in April (which we discussed in a previous E-Alert), OSHA now says that employers are no longer required to record adverse reactions to COVID-19 vaccination.

Previously, OSHA stated that if an employer required employees to be vaccinated as a condition of employment, then any adverse reaction to the vaccine was work-related, and thus recordable if it was also a new case and met one or more of the general recording criteria.

Now, OSHA states that it is concerned that this requirement may have hurt vaccination efforts, and that “it does not wish to have any appearance of discouraging workers from receiving COVID-19 vaccination.” Thus, in the new guidance, OSHA states that it will not enforce the recording requirements as applied to COVID-19 vaccinations through May 2022.

Employers (especially those in California) should continue to monitor state specific reporting requirements, which may differ from the federal OSHA guidance.

*For questions related to OSHA’s updated guidance or any other matters related to managing COVID-19 in the workplace, contact Wilson Jarrell at 503-276-2181 or [wjarrell@barran.com](mailto:wjarrell@barran.com).*

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