

Frequently Asked Questions on the CDC and OSHA Meat and Poultry Processing Workers and Employers Interim Guidance

On May 1, the Centers for Disease Control and Prevention (CDC) National Institute for Occupational Safety and Health (NIOSH) and the Department of Labor (DOL) Occupational Safety & Health Administration (OSHA) hosted a call with NAMI members to discuss the Meat and Poultry Processing Workers and Employers Interim Guidance from CDC and OSHA (CDC/OSHA guidance). Speakers included, Doug Trout, MD, MHS, the Chief of the Hazard Evaluations and Technical Assistance Branch at NIOSH and Chris Brown, PhD, MPH, CPH, the Special Assistant in the Office of the Assistant Secretary for OSHA. Common questions from industry and responses from CDC and OSHA on the CDC/OSHA guidance are below. Contact [KatieRose McCullough](#) with additional questions.

General

- 1. Question: Should employees feel safe coming to work and confident in the control of potential COVID-19 spread in establishments that implement the CDC/OSHA guidance?**

Answer: The CDC/OSHA guidance for the meat and poultry industry is written to assist establishments in completing a COVID-19 assessment and control plan. The establishment specific COVID-19 assessment and control plan is designed to reduce the potential introduction and control the potential spread of COVID-19.

Establishments that have implemented the CDC/OSHA guidance should feel confident that they are doing their part to keep their employees safe while continuing their critical operations. Employers should continue to monitor their workers for signs/symptoms of illness. In workplaces that have implemented the CDC/OSHA guidance, continued spread of the disease may mean that the employer's COVID-19 plan is not fully effective or it may mean that greater community-wide mitigation activities are necessary. Control measures may need to be adjusted and workers may need to be re-trained. Knowledge about COVID-19 is continually evolving. All plans to address COVID-19 among workers and in the community may need updating and revision as more is learned.

Contact Tracing

- 1. Question: Contact tracing is an important tool for COVID-19 investigations. In an establishment that is implementing controls like partitions, face shields, and face coverings, what can establishments expect in terms of contact tracing by local health authorities?**

Answer: Contact tracing is a key strategy for preventing further spread of COVID-19. During the investigation, the establishment's COVID-19 assessment and control plan should be considered in determining if tracing of in-plant co-worker contacts should be conducted. If the establishment has put into place CDC and OSHA recommended controls, the risk of exposure to other establishment employees is decreased. However, state and local public health departments, with the support of the CDC when appropriate, can determine if further contact tracing is necessary to stop an outbreak linked to a particular meat processing or packaging facility. It is likely that tracing contacts of COVID-19 positive employees will be focused on those

individuals who had prolonged close contact with the employee, and have therefore had a high-risk exposure.

Testing

1. **Question: What role does testing play in meat and poultry establishments? Should establishments test a large proportion or all of their employees? Does CDC/OSHA anticipate issuing additional guidance on the topic of asymptomatic or symptomatic testing of employees?**

Answer: CDC has released general testing recommendations.¹ Worksite assessments to identify COVID-19 risks and prevention strategies should be done periodically as part of sound occupational health and public health practice. Facilities should consider the appropriate role for testing in a worksite risk assessment. Currently, CDC does not have recommendations on the topic of establishment-wide testing. Testing results are a snapshot in time and can give employees a false sense of security. Even if an employee tests negative, he or she still must follow CDC guidance to prevent future exposure to COVID-19. CDC and OSHA are constantly updating guidance on COVID-19 and there will be additional guidance provided when appropriate.

Face Coverings

1. **Question: Will there be any proposed recommendation on the construction specifications for face covers, masks? Are single layer fabric face coverings acceptable?**

Answer: The CDC provides guidance on the fit and construction of face coverings.² Cloth face coverings should fit snugly but comfortably against the side of the face, be secured with ties or ear loops, include multiple layers of fabric, allow for breathing without restriction, and be able to be laundered and machine dried without damage or change to shape.

2. **Question: Regarding N-95 respirator masks for employees conducting the screening of personnel, does this fall under the normal OSHA standards and require a fit test? Is this OSHA standard applicable in this circumstance?**

Answer: OSHA is allowing its Compliance Safety and Health Officers (CSHOs, or inspectors) to exercise enforcement discretion around some provisions of the Respiratory Protection standard (29 CFR 1910.134), where appropriate and where employers follow other considerations in the agency's enforcement guidance (see www.osha.gov/enforcementmemos). At this time annual, fit tests may be delayed. However, initial fit tests are still required. Employers may allow voluntary use of filtering facepiece respirators. When employers follow the voluntary use provisions of the Respiratory Protection standard, including providing workers with a copy of Appendix D on voluntary use, the employer does not need to perform initial or annual fit testing, training, and other requirements that are in place when respirators are necessary to protect workers.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/hcp/clinical-criteria.html>

² <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

Social Distancing

1. **Question: In many establishments, it is very difficult or impossible for employees to maintain a distance of 6 feet apart at all times. Does the use of PPE, face coverings, and physical barriers reduce the risk of spread and therefore should allow for safe operation? If it is impossible to maintain 6 feet on a line or install barriers, is the face mask and personal face shield an acceptable alternative?**

Answer: Physical barriers do not replace social distancing recommendations, when feasible. When not possible to maintain 6 feet of separation between employees, the CDC and OSHA guidance is clear that other controls can and should be employed to allow safe operation. The establishment-specific COVID-19 assessment and control plan should address the controls an establishment will utilize, according to the hierarchy of controls (i.e., engineering controls, including physical barriers; administrative controls, including requiring face coverings used as source control to contain wearer's respiratory droplets; and PPE, such as face shields, where other control measure are not feasible or are not sufficient to prevent worker exposures to hazards, including the virus that causes COVID-19). These controls should align with the CDC and OSHA guidance, but employers may need to make adaptations to suit their specific operations or plan configurations.