Key Documents

• Advisory Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response
• Interim Guidance from CDC and OSHA: Meat and Poultry Processing Workers and Employers
• Statement of Enforcement Policy by Solicitor of Labor Kate O’Scannlain and Principal Deputy Assistant Secretary for OSHA Loren Sweatt Regarding Meat and Poultry Processing Facilities
• Executive Order on Delegating Authority Under the DPA with Respect to Food Supply Chain Resources During the National Emergency Caused by the Outbreak of COVID-19
• List N: Disinfectants for Use Against SARS-CoV-2
Exposure Risk Among Meat and Poultry Processing Workers

PART ONE OF CDC/OSHA GUIDANCE
Exposure Risk Among Meat and Poultry Processing Workers

• **Distance between workers** – Employees may work near each other during processing and be near one another at other times (clocking in or out, during breaks, or in locker/changing rooms)

• **Duration of contact** – Continued contact with potentially infectious individuals increases the risk of transmission. Workers often have prolonged closeness to each other.

• **Type of contact** – Meat and poultry processing workers may be exposed to the infectious virus through respiratory droplets in the air or exposure could occur from contact with contaminated surfaces or objects, such as tools, workstations, or break room tables. Shared spaces such as break rooms, locker rooms, and entrances/exits to the facility may contribute to their risk.
Exposure Risk Among Meat and Poultry Processing Workers

• Other distinctive factors that may increase risk among these workers include:
  – A common practice at some workplaces of sharing transportation such as ride-share vans or shuttle vehicles, car-pools, and public transportation
  – Frequent contact with fellow workers in community settings in areas where there is ongoing community transmission.
Create a COVID-19 Assessment and Control Plan

PART TWO OF CDC/OSHA GUIDANCE
Introduction

• Identify a workplace coordinator – Document and state why qualified
  – All workers should be able to ID and contact the coordinator with concerns
• Plan should apply to anyone entering the establishment
• The establishment and plant should be assessed periodically to identify COVID-19 risks and prevention strategies
• Consider the appropriate role for testing and workplace contact tracing
Plan Overview

• Controls
• Education and Training
• Cleaning and Disinfection
• Screening and Monitoring
• Screening of Workers for COVID-19
• Managing Sick Workers
• Return to Work
• PPE
Engineering Controls – Social Distancing and Barriers

• Configure employee environments so they are six feet apart in all directions, **if possible.**
  – This approach includes workstation alignment along processing lines, **if feasible.**

• **Ideally,** modify the alignment of workstations so that workers do not face one another
Engineering Controls – Social Distancing and Barriers

• Consider using markings and signs to remind workers to stay at their station away from each other and practice social distancing on breaks.

• Use physical barriers, such as strip curtains, plexiglass or similar materials, or other impermeable dividers or partitions, to separate meat and poultry processing workers from each other, if feasible.
How to Align Meatpacking and Meat Processing Workstations, If Feasible

**Bad:**
Workers are within six feet of one another, including at side-by-side or facing workstations.

**Good:**
Workers are spaced at least six feet apart, not facing one another. Other configurations may be used to achieve similar distancing between workers.
**Good:**
Physical barriers, such as partitions, separate workers from each other.

Partitions may need to be adjusted to integrate with the processing line or other manufacturing equipment.

**Good:**
Physical barriers, such as partitions, separate workers from each other, including where workers need to perform tasks in tandem across from one another.

For tasks performed in tandem with workers across from one another, partitions can be positioned to protect workers while allowing the pass-through of materials.
Engineering Controls – Ventilation

• Ventilation, including heating and air conditioning in work areas, should help minimize workers’ potential exposures.
  – Take steps to minimize air from fans blowing from one worker directly at another worker.
  – Personal cooling fans should be removed from the workplace to reduce the potential spread of any airborne or aerosolized viruses.
Engineering Controls – Hand Hygiene

• Place handwashing stations or hand sanitizers with at least 60% alcohol in multiple locations to encourage hand hygiene.
  – If possible, stations should be touch-free.
Engineering Controls – Non-Food Contact Areas

• Add additional clock in/out stations spaced apart to reduce crowding in these areas, *if possible*.
  – **Consider** alternatives such as touch-free methods or staggering times for workers to clock in/out.

• Remove or rearrange chairs and tables, or add partitions to tables, in break rooms and other areas workers may frequent to enhance employee separation.

• Identify alternative areas to accommodate overflow volume, such as training and conference rooms or using outside tents for break and lunch areas.
Administrative Controls – Promote Social Distancing

- *Encourage* single-file movement with a six-foot distance between each worker through the facility, *where possible*.
- Designate a monitor to facilitate distancing on processing floor lines.
- Stagger break times or provide temporary break areas and restrooms to avoid crowding during breaks. Employees should maintain at least six feet of distance from others, including when on breaks.
- Stagger workers’ arrival and departure times to avoid employee crowding in parking areas, locker rooms, and near time clocks.
- Provide visual cues (*e.g.*, floor markings, signs) to remind workers to maintain social distancing.
- *Encourage* workers to avoid carpooling to and from work, *if possible*.
Administrative Controls – Promote Social Distancing: Carpooling

If carpooling or using company shuttle vehicles is a necessity for workers, the following control practices should be used:

- Limit the number of people per vehicle as much as possible. *This may mean using more vehicles.*
- **Encourage** employees to maintain social distancing in vehicle as *much as possible.*
- **Encourage** employees to use hand hygiene before entering the vehicle and when arriving at the destination.
- **Encourage** employees in a shared van or car space to wear cloth masks.
- Clean and disinfect commonly touched surfaces after each carpool or shuttle trip (e.g., door handles, handrails, seatbelt buckles).
- **Encourage** employees to follow coughing and sneezing etiquette when in the vehicle.
Administrative Controls – Leave and Incentive Programs

• Monitor and respond to absenteeism at the workplace. Implement plans to continue essential business functions in cases of higher than usual absenteeism.

• **Review** leave and incentivize policies:
  – Analyze sick leave policies and **consider** modifying them to make sure that ill workers are not in the workplace.
  – Make sure employees know and understand these policies.
  – Analyze incentive programs and **consider** modifying them so employees are not penalized for taking sick leave if they have COVID-19.
  – Additional flexibilities *might* include giving advances on future sick leave and allowing employees to donate sick leave to each other.
Administrative Controls – Cohorting

• **Consider** grouping employees together.
  
  – **Consider** cohorting or grouping employees together and assigning them to the same shift.
  
  – This minimizes the number of employees who come into close contact and may reduce transmission and the number of employees who may need to be quarantined.
Administrative Controls – Notification

• Establish a system for employees to alert their supervisors if they are experiencing signs or symptoms of COVID-19 or if they have had recent close contact with a suspected or confirmed COVID-19 case.

  – BUT REMEMBER: Employees who are exposed to the virus and remain asymptomatic may continue to work
Administrative Controls – Hand Hygiene

• Provide access to hand hygiene materials.
  – Provide alcohol-based hand sanitizers containing at least 60% alcohol \textit{if soap and water are not immediately available}.
  – Place hand sanitizers in multiple locations to encourage hand hygiene. \textbf{If possible}, choose touch free hand sanitizer stations.

• Workers should be educated to avoid touching their faces, particularly until after washing hands and upon completing work and/or removing PPE.
Administrative Controls – Hand Hygiene

• Consider other workplace programs to promote personal hygiene, such as:
  – Building in additional short breaks to increase time for employees to practice hand hygiene.
  – Providing tissues and no-touch trash receptacles.
  – Educating workers that cigarettes and smokeless tobacco use can lead to increased risk of transmission.
Administrative Controls – Cloth Face Coverings

• In addition to social distancing measures, cloth face coverings should be worn, especially where employees cannot maintain 6 feet from others.

• Keep in mind:
  – They must be clean
  – You may need more than one mask per shift
  – Provide back ups
Administrative Controls – Cloth Face Coverings

- fit over the nose and mouth and fit snugly but comfortably against the side of the face;
- are secured with ties or ear loops;
- include multiple layers of fabric;
- allow for breathing without restriction;
- can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape;
- are not used if they become wet or contaminated;
- are replaced with clean replacements, as needed.
- are handled as little as possible to prevent transferring infectious materials to the cloth;
- are not worn with or instead of respiratory protection when respirators are needed.
REMEMBER!

• Cloth face coverings are **NOT** PPE.
• Cloth face covering may reduce the amount of large respiratory droplets spread when talking, sneezing, or coughing.
• Cloth face coverings may prevent asymptomatic spread.
• Cloth face coverings are intended to protect **other people**—**not the wearer**.
Use a Cloth Face Covering to Protect Others

- Wear a face covering to protect others from the virus that causes COVID-19 in case you’re infected but don’t have symptoms
- Keep the covering on your face the entire time you’re in public
- Don’t put the covering around your neck or up on your forehead

cdc.gov/coronavirus
Education and Training

• Supplement normal and required job training with additional training and information about COVID-19.
  – Training should include recognizing signs and symptoms of infection, and ways to prevent exposure to the virus.
  – Training should include infection prevention and control measures and information from your COVID-19 response plan.
Education and Training

• All communication and training should be easy to understand and should:
  1. Be provided in languages appropriate to the preferred languages spoken or read by the workers, if possible;
  2. Be at the appropriate literacy level
  3. Include accurate and timely information, including information.
Education and Training

- Signs and symptoms
- How it spreads
- Workplace exposures
- How workers can protect themselves.
- Proper handwashing practices and use of hand sanitizer stations.
- Cough and sneeze etiquette.
- Other routine infection control precautions
Education and Training

• Posters in all appropriate languages should be posted encouraging sick employees to stay home, coughing and sneezing etiquette, and on hand hygiene.

• Posters should be in the entrance to the workplace and in break areas, locker rooms, and other popular places

• Posters should be able to be read from a far distance.
COVID-19 воротэ афондьо входъо амдьо карову амдьо урдай амдьо альдьо амдьо урдай амдьо афыннын.


Iska ilaali inaad u dhawato dadka xanuusanaya.
Ku dabooll qufaama hindhisadaada softi, kadiibna softiga qashinka ku dar.

Iska ilaali taabashada indihaha, sanka, iyo afkaaga.

Marka aad dadwaynaha dhex joogto, xiro marada wejiga taasi oo daboolayso sanka iyo afkaaga.

Gurigaa joog markii aad xanuusan tahay, laaga reeo marka aad daryeel caafimaad raadinayso.

Ku dhaq gacmaahaaga saabuun iyo biyo ugu yaraan 20 ilbirisig.

cdc.gov/coronavirus
Cleaning and Disinfection

• Establish protocols and provide supplies to increase the frequency of sanitation in work and common spaces.

• Disinfect frequently touched surfaces in workspaces and break rooms at least once per shift, if possible.

• If physical barriers are being used, then these should be cleaned frequently.
Keep in Mind...

• Workers who perform cleaning and disinfection tasks may require additional PPE and other controls to protect them from chemical hazards posed by disinfectants.

• Employers must ensure their written hazard communication and training programs are up to date.
Screening and Monitoring

- Establishments should *consider* developing and implementing a screening and monitoring strategy aimed at preventing the introduction of COVID-19 into the worksite.

- Screening program *should* include screening workers before entry into the workplace, criteria for return to work of exposed and recovered, and criteria for exclusion of sick workers.
Screening of Workers for COVID-19

• Screen before entry into the establishment.
• Provide verbal screening in appropriate languages to determine if employees have had COVID-19 symptoms in past 24 hours.
• Check temperatures of workers at the start of each shift to identify those with a fever of 100.4°F or greater (or reported feelings of feverishness).
• Do not let employees enter the workplace if they have a fever of 100.4°F or greater (or reported feelings of feverishness), or if screening results indicate that the individual may be ill.
  – Encourage individual to self-isolate and contact a healthcare provider.
  – Provide information on the facility’s return-to-work policies and procedures.
  – Inform human resources, employer health unit (if in place), and supervisor.
Screening of Workers for COVID-19

• Ensure that those performing screening activities are appropriately protected from exposure
  – Implement engineering controls, such as physical barriers or dividers or rope and stanchion systems, to maintain at least 6 ft of distance between screening.
  – If screeners need to be within 6 ft of workers, provide them with appropriate PPE based on the repeated close contact.
  – PPE *may* include gloves, a gown, a face shield, and, at a minimum, a face mask.
  – N95 filtering facepiece respirators (or more protective) *may* be appropriate for workers performing screening duties and necessary for workers managing a sick employee in the work environment.
Managing Sick Workers

• Individuals with symptoms upon arrival or who become sick during the day should be immediately separated and sent home.

• Ensure that personnel managing sick employees are appropriately protected from exposure.
  – When personnel need to be within 6 ft of a sick individual, appropriate PPE may include gloves, a gown, a face shield and, at a minimum, a face mask.
  – N95 filtering facepiece respirators (or more protective) may be appropriate for workers with symptoms of COVID-19.
Managing Sick Workers

• The workstation and tools handled by the sick individual should be disinfected.
• If an individual is confirmed to have COVID-19, employers should contact trace.
• Employers should work with state, local, tribal and/or territorial health officials to identify potential exposed employees.
Return to Work

• Critical infrastructure employers have an obligation to manage the continuation of work and return to work of their workers in ways that best protect the health of workers, their coworkers, and the general public.

• Prioritize positions without which critical work would stop.

• Prioritization *should* include an analysis of work tasks, workforce availability, and assessment of hazards associated with the tasks and worksite.

• Cross-train workers to perform critical duties at a worksite to minimize the total number of workers needed to continue operations.
Employees with **Confirmed** or **Suspected COVID-19 Illness and Exhibit Symptoms**

- There are 2 recommended strategies for determining when the employee may return to work.
- The first is based on testing and the second is based on time since illness onset.
- Currently, one approach is not recommended over the other.
Employees with **Confirmed or Suspected COVID-19 Illness and Exhibit Symptoms**

**Test-Based Strategy** - Exclude from work until:

- Resolution of fever *without* the use of fever-reducing medications; **and**

- *Improvement* in respiratory symptoms (e.g., cough, shortness of breath); **and**

- Negative results of an FDA EUA molecular assay from at least 2 consecutive nasopharyngeal swab specimens collected ≥24 hours apart (total of two negative specimens).
Employees with Confirmed or Suspected COVID-19 Illness and Exhibit Symptoms

Time Since Illness Onset Strategy - Exclude from work until:

– At least 3 days have passed since recovery defined as resolution of fever without the use of fever-reducing medications and improvement in respiratory symptoms, and

– At least 10 days have passed since symptoms first appeared.
Employees **Diagnosed With COVID-19 who are Asymptomatic**

- Like those with symptoms, there are 2 strategies for determining when the employee may return to work.
- The first is based on testing and the second is based on time since illness onset.
- Currently, one approach is not recommended over the other.
Employees Diagnosed With COVID-19 who are Asymptomatic

Time-based strategy - Exclude from work until:

– At least 10 days have passed since *first positive test* assuming they have not subsequently developed symptoms since their positive test.

– If they develop symptoms, then the symptom-based or test-based strategy should be used.
Employees **Diagnosed With COVID-19 who are Asymptomatic**

*Test-based strategy* - Exclude from work until:

– Negative results of an FDA EUA molecular assay for COVID-19 from at least *two* consecutive nasopharyngeal swab specimens collected ≥24 hours apart (total of two negative specimens).
Employees Exposed to COVID-19 who are Not Showing Symptoms

Employers may allow workers who have been exposed to COVID-19, but remain without symptoms, to continue to work, provided they adhere to additional safety precautions.
Employees Exposed to COVID-19 who are Not Showing Symptoms

• The additional safety precautions should include:
  – Temperature screening prior to entering the facility
  – Regular self-monitoring of symptoms under the supervision of the employer’s occupational health program
  – Use of facemask or face coverings
  – Follow social distancing by maintaining 6 feet from others as work duties permit in the workplace
  – Routinely clean and disinfect workspace
Personal Protective Equipment

- Employers must conduct a hazard assessment to determine hazards present, or are likely to be present, for which workers need PPE.
- OSHA’s PPE standards (29 CFR 1910 Subpart) require employers to select and provide appropriate PPE to protect workers from hazards identified in the hazard assessment.
- The results of that assessment will be the basis of workplace controls (including PPE) needed to protect workers.
Personal Protective Equipment

• Employers should:
  – Use videos or in-person demonstrations of proper PPE donning and doffing procedures.
  – Emphasize that care must be taken when putting on and taking off PPE to ensure that the worker or the item does not become contaminated.
  – Provide PPE that is either disposable (preferred) or, if reusable, ensure it is properly disinfected and stored in a clean location when not in use.
  – PPE worn at the facility should not be taken home or shared.
Personal Protective Equipment – Face Shields

• May serve as both PPE and source control.
• Face shields can provide additional protection from both potential process-related splashes and potential person-to-person droplet spread.
  – Only some face shields are acceptable substitutions for eye protection.
  – Occupational safety and health professional should evaluate face shields for substitution.
Personal Protective Equipment – Face Shields

• Face shields can help minimize contamination of masks and cloth face coverings.
  – If used, face shields should be cleaned and decontaminated after each shift
  – When not in use, they should be kept in a clean location at the work facility.
  – Face shields should also wrap around the sides of the wearer’s face and extend to below the chin.
REMEMBER...

• Employers should stress hand hygiene before and after handling all PPE.

• When PPE is needed, employers should consider additional hazards created by poorly fitting PPE and regarding the work environment.
Executive Order 13917

• Secretary of Agriculture shall take all appropriate action ... to ensure that meat and poultry processors continue operations consistent with the guidance for their operations jointly issued by the CDC and OSHA.
Statement of Enforcement Policy

• Enforcement discretion for employers adhering to appropriate guidance, including the Joint Meat Processing Guidance.

• Conduct worksite assessments to identify COVID-19 risks and prevention strategies and implement them.
Statement of Enforcement Policy

• To the extent ... certain measures are not feasible in the context of specific plants and circumstances, ... document why
• OSHA will take into account good faith attempts to follow the ... Guidance. OSHA does not anticipate citing employers that adhere to the ... Guidance.
Statement of Enforcement Policy

Where ... employer operating pursuant to the President’s invocation of the DPA has demonstrated good faith attempts to comply with the ... Guidance and is sued for alleged workplace exposures, the Department of Labor will consider a request to participate in that litigation in support of the employer’s compliance program.
QUESTIONS