**COVID-19 Operational Guidance for Food and Meat Processing Facilities
and Workplaces with Assembly Lines
April 25, 2020**

1. Purpose

Pursuant to Executive Order 2020-10, which was extended by Executive Order 2020-18, food and meat processing facilities and manufacturing facilities (collectively, "facilities") are categorized as critical infrastructure and essential businesses. This guidance document provides parameters for such facilities to protect their employees and reduce the transmission of COVID-19.

2. Background

COVID-19 is a respiratory illness that can be spread from person-to-person. Employers, including manufacturing and food and meat processing facilities, are responsible for maintaining a safe workplace and healthy work environment for their employees and, to that end, must take necessary measures to protect their employees. In addition, facilities must decide when it is no longer safe to remain open for business because of the challenges of the COVID-19 pandemic, such as an increased rate of infection among employees, not enough employees to maintain operations, or the difficulty of implementing appropriate physical distancing measures.

3. Role and Responsibility of Local and State Public Health Departments

Pursuant to the Department of Public Health Act, 20 ILCS 2305/2, and the Illinois Control of Communicable Diseases Code, 77 Ill. Adm. Code 690, the Illinois Department of Public Health (IDPH) and certified local health departments have the authority and responsibility to investigate and control infectious disease outbreaks, including the COVID-19 pandemic.

- The Centers for Disease Control and Prevention (CDC) has issued general guidance to employers on reducing the risk of transmission, which is available here.
- IDPH and local health departments may provide specific suggestions on how to reduce risk to employees from acquiring COVID-19, including holding teleconferences to review the situation at the facility and providing suggestions for risk reduction.

- IDPH and local health departments can assist businesses with issues relating to employee access to COVID-19 testing, when necessary.
- IDPH and local health departments may conduct onsite visits to identify any areas in need of improvement in a facility's response to COVID-19.
- Local health departments are responsible for interviewing COVID-19 positive employees and identifying close contacts of that employee, with assistance from the employer for close contacts within the workplace.
- Per the Illinois Control of Communicable Disease Code, 77 Ill. Adm. Code 690, facilities are required to respond to and collaborate with IDPH and their local health department. This includes allowing visits to the facility for an assessment and responding to requests for information including, but not limited to:
  - The employer's current practices to reduce risk to employees;
  - A complete list of employees;
  - A complete list of employees who have called off sick, broken down by date; and
  - Prompt reports of any COVID-19 cases that the facility has identified in either Illinois residents or residents of other states to the local health department within 24 hours.

4. COVID-19 Infection Control Plan for the Facility

Facilities should immediately develop and implement an infection control plan to address necessary strategies to protect employees while maintaining continuity of operations. Specifically, the infection control plan should include the following topics.

A. Screening Employees

Facilities should screen their employees as follows:

- Screen and monitor employees, including fever checks and symptom checks.
  - Perform pre- and post-shift monitoring.
  - Do not rely on fever checks only. Over one third of the confirmed COVID-19 cases in Illinois do not report a fever.
  - Ask employees about symptoms; do not rely only on employee self-reporting. Symptoms may include the following: fever (100.4° or above), cough, shortness of breath, sore throat, chest tightness, extreme fatigue, loss of sense of taste or smell, diarrhea, muscle aches, and headaches.
  - Ask employees if they have family members who have tested positive for COVID-19 or are otherwise experiencing symptoms of COVID-19.
- Facilities should use ask employees to complete the recommended self-monitoring tool.
- Facilities should set up a location outside to perform symptom screening in a manner that allows for social distancing and proper hygiene.

- Facilities must not allow employees who are sick to enter the workplace until they have been cleared by a physician.
- Facilities should remind employees to immediately report to their supervisor if they get sick during a shift.

B. Testing for COVID-19

Testing for COVID-19 is an essential strategy in the public health response. Testing will:

- Provide data regarding the incidence of COVID-19 among employees; and
- Allow facility managers to identify which employees have tested positive.

IDPH and local health departments can assist with increasing testing capacity and with identifying methods for testing symptomatic employees, such as setting up tents outside of the facility and working with local healthcare providers.

C. Health and Safety Committee

Facilities should convene a health and safety committee comprised of labor-management representatives to discuss recommendations, workplace protections and rights, and actions for implementation to support infection control procedures. The following are considerations for such a committee:

- Develop policies that encourage sick employees to stay at home without fear of reprisals and communicates such policies to employees.
- Implement interim leave policies to accommodate workers who are sick.
- Consider adopting a policy that requires employees who test positive or who are at high risk of infection due to recent close contact with an infected individual to stay home for 14 days, which is considered to be the maximum incubation period.
- Do not provide incentives for work attendance or penalize employees for taking time off.
- Designate a safety team, with designated team leaders, who can share relevant information with employees and convey employee concerns back to management. With appropriate social distancing, this team may meet with their designated employees on a daily basis.

D. Social Distancing and Other Administrative Controls

Pursuant to Executive Order 2020-10, Section 15, which was extended by Executive Order 2020-18, facilities must ensure that employees are adhering to social distancing, which includes maintaining at least six feet of physical distance between individuals at all times to the greatest extent feasible, washing hands with soap and water for at least twenty seconds as frequently as possible or using hand sanitizer, covering coughs or sneezes (into the sleeve or elbow, not hands), regularly cleaning high-touch surfaces, and not shaking hands. Maintaining six feet

between employees is a critical step in reducing the risk of the spread of COVID-19, especially because individuals can transmit the virus in the 48 hours prior to the onset of symptoms.

Facilities should evaluate all areas for social distancing, including staggering access to certain areas, such as:

- Break room, meal room, cafeteria, and similar shared spaces
  - Consider staggering meals and breaks to decrease the number of people on break at the same time.
  - Consider using tape to mark the areas where employees may sit or stand in cafeteria to ensure compliance with social distancing.
  - Consider removing some seating from meal and break rooms to ensure employees do not sit within six feet of each other.
  - Weather permitting, consider adding picnic tables or tents outside for social distancing during breaks and meals.
  - Develop a protocol for how employees can safely store their personal protective equipment (PPE) while going on break without bringing PPE into the shared areas.
- Bathrooms
  - Consider making portable toilets available.
- Processing lines
  - Stagger shifts, start times, and break times as feasible to prevent congregating.
  - Reduce production line staffing to the extent feasible to minimize close worker contact. Adjust line speed to allow workers to maintain distance. Wherever it is not feasible to maintain a distance of six feet between workers in a production line, workers should be separated by barriers and be provided PPE including, at a minimum, face masks.
  - Operate only essential lines and shut down non-essential lines.
- Locker rooms
  - Consider assigning lockers to employees in each shift and ensuring that assigned lockers are six feet away from each other. Alternatively, consider staggering the use of the locker room to ensure workers are six feet away from each other.
- Entrances and exits
  - Designate one-way entrances and exits in and out of the facility.
  - Mark distances six feet apart where workers may stand in line when waiting to clock in or out, conduct health assessments, wait for transportation, and other areas where workers normally congregate.
  - Ensure that any biometric device or other timekeeping system that requires worker touch a common surface, such as a screen or keypad, is cleaned routinely. In addition, hand sanitizer or disinfecting wipes should be located next to the timekeeping system for employee use before and after clocking in or out.

- Tool rooms
  - Disinfect tools between use when used by multiple employees.

In addition, facilities should:

- Identify ways to physically separate employees from each other in all areas of the facility, such as the use of plexiglass barriers.
- Adapt workstations to minimize close contact of employees.
- If shuttle buses are used to bring employees to a work site, ensure employees observe appropriate social distancing and wear face masks on the bus and that the shuttle buses are regularly cleaned and disinfected.
- Use visual cues (e.g. floor markings or signs) to show 6 feet separation.
- Ensure that fans blow clean air, if fans are used in the facility.
- If there is employer-provided housing, separate COVID-19 positive employees from asymptomatic employees.
- Limit visitors to those essential to business operations and restrict where visitors can go within the facility.

E. Personal Protective Equipment

Facilities should:

- Provide employees with the necessary PPE and replace when necessary.
- Require that employees wear masks.
- Train employees on how to properly don and doff PPE to prevent contamination or the transfer of infected materials.
- Stress good hand hygiene after gloves or facial coverings are removed.
- Consider use of face shields.

F. Cleaning, Disinfecting, and Sanitizing

Facilities should:

- Disinfect "high touch surfaces" in production areas with products meeting the Environmental Protection Agency's criteria for use against COVID-19 and approved under the facility's sanitation standard operating procedures. High touch surfaces include, but are not limited to, doorknobs, light switches, shared equipment, toilet handles, sink faucets, clock in/out areas, vending machines, and tools.
- Ensure handwashing stations are readily available, with access to soap, clean water, and single use paper towels for handwashing. Provide no-touch receptacles when possible.
- When handwashing stations are not available, provide alcohol-based hand sanitizers containing an alcohol content of at least 60% ethanol or 70% isopropanol.

- Monitor to ensure cleaning and disinfecting is being done routinely and that proper handwashing practices are being followed.
- Perform enhanced cleaning and disinfection after persons with suspected or confirmed COVID-19 have been in the facility.
- Develop a protocol for sanitizing hard hats, face shields, and other PPE at the end of the shift.

G. Education

Facilities should provide training and education to their employees about the COVID-19 pandemic, including the transmission, symptoms, information about testing, necessary safety precautions, the steps the facility is taking to mitigate the spread of COVID-19, and anti-retaliation laws.

- The training should be consistent with CDC and IDPH guidance and should emphasize the importance of employees staying home when sick.
- The training should be easy to understand, include accurate and timely information, and be available in languages appropriate to preferred language(s) spoken or read by the employees.
- Employers should consider literacy issues when providing training.
- Such training can be provided via various methods, including:
  - On televisions in the workplace or via text message.
  - From team leaders
  - On easy to understand posters with pictures about symptoms, proper handwashing, and disease transmission
- The materials should include updated content to ensure employees pay attention.
- Facilities should maintain copies of all materials used for training purposes while this guidance is in effect.
- Facilities should reinforce training and best practices by posting signage in common areas.

H. Voluntary Shutdown

Facilities should consider voluntarily shutting down their operations when any of the following circumstances are present:

- Increasing COVID-19 infection rates amongst facility employees;
- An inadequate number of employees to safely perform work;
- An inability to maintain social distancing spacing requirements of at least six feet between employees; or
- An inadequate supply of PPE.

I.   Involuntary Shutdown

A facility that does not voluntarily comply with Executive Order 2020-10 or the Control of Communicable Diseases Code may be ordered to close by a local health department. *See* 20 ILCS 2305/2(b). The Attorney General's Office or local State's Attorney may assist the local health department in bringing an enforcement action if the facility does not comply with the closure order. *See* 77 Ill. Adm. Code 690.1340(a). Failure to comply with the closure may result in criminal penalties. 20 ILCS 2305/8.1.

J.   References and Resources

Centers for Disease Control and Prevention, *Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)*, https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

Centers for Disease Control and Prevention, *If You Are An Essential Critical Worker Who Has Been Exposed to COVID-19*, https://www.cdc.gov/coronavirus/2019-ncov/downloads/Essential-Critical-Workers_Dos-and-Donts.pdf

Centers for Disease Control and Prevention, *Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19,* https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html

IDPH's Business and Organization Guidance, http://dph.illinois.gov/topics-services/diseases-and-conditions/diseases-a-z-list/coronavirus/business-guidance

Food Industry Recommended Protocols When Employee/Visitor/Customer Tests Positive for COVID-19, April 1, 2020, http://www.afdo.org/resources/Documents/COVID19/2020-04-01%20FBIA%20COVID19_Case%20Recommended%20Protocols%20V4.pdf

Emergency Prevention Measures to Achieve Physical (Social) Distancing in Food Manufacturing Facilities as Related to COVID-19, March 31, 2020, https://affifoodsafety.org/wp-content/uploads/2020/04/2020-03-31-Emergency-Prevention-Measures-to-Achieve-Physical-Social-Distancing-in-Food-Manufacturing-Facilities-as-Related-to-COVID-19.pdf

Illinois Control of Communicable Diseases Code, 77 Ill. Adm. Code 690, http://ilga.gov/commission/jcar/admincode/077/07700690sections.html