MIOSHA
Michigan Occupational Safety and Health Administration

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC OPPORTUNITY

COVID-19 Workplace Requirements for **Meat and Poultry Processing**

SUMMARY OF MIOSHA EMERGENCY RULES

Important Note

MDHHS has issued COVID-19 Public Health Orders regarding requirements about face coverings for the public, gathering limitations, and other public health concerns.

Please visit Michigan.gov/Coronavirus for information on these public health orders.

The requirements in this presentation are required by MIOSHA Emergency Rules for COVID-19.

Overview

- Requirements for All Workplaces
  - Definitions
  - Exposure Determination
  - COVID-19 Preparedness & Response Plan
  - Basic Infection Control Measures
  - Health Surveillance
  - Workplace Controls
  - Person Protective Equipment
  - Employee Training
  - Recordkeeping
- Meat and Poultry Processing Industry Requirements and Resources

MIOSHA Emergency Rules for COVID-19

REQUIREMENTS FOR ALL WORKPLACES

Definitions

- **Close Contact**: someone who was within 6ft of an infected person for at least 15 minutes starting from 2 days before illness onset (or for asymptomatic persons, 2 days prior to specimen collection) until the time the person is isolated
- **COVID-19**: coronavirus disease 2019, a severe acute respiratory disease characterized by symptoms including fever, cough, fatigue, and shortness of breath which may progress to pneumonia, multi-organ failure, & death
- **Known Cases of COVID-19**: person who have been confirmed through diagnostic testing to have COVID-19
- **SARS-CoV-2**: severe acute respiratory syndrome coronavirus 2, the virus which is the causative agent of COVID-19
- **Suspected Cases of COVID-19**: persons who have symptoms of COVID-19 but have not been confirmed through diagnostic testing or person who have had close contact with a person who has been confirmed through diagnostic testing

Exposure Determination

- Evaluate routine & reasonably anticipated tasks/procedures to determine actual OR reasonably anticipated exposures to SARS-CoV-2
- Categorize tasks/procedures into the following risk categories:
  - Lower Exposure Risk
  - Medium Exposure Risk
  - High Exposure Risk
  - Very High Exposure Risk
- Use OSHA guidance for additional resources for exposure determination
  - Guidance on Preparing Workplaces for COVID-19
  - COVID-19 Hazard Recognition

Exposure Determination

Exposure Risk Categories

- Lower Exposure Risk
  - Tasks do not require contact with people known or suspected of being infected with SARS-CoV-2
  - Tasks do not have frequent close contact with the public
  - Workers have minimal occupational contact with coworkers & the public
- Medium Exposure Risk
  - Tasks require frequent OR close contact with people who may be infected with SARS-CoV-2, but who are NOT a known/suspected COVID-19 patient
  - In areas with ongoing community transmission, workers that have contact with the public (schools, high-population-density work environments, high-volume retail settings)
  - In areas without ongoing community transmission, workers that have frequent contact with travelers from areas with ongoing community transmission

Exposure Determination

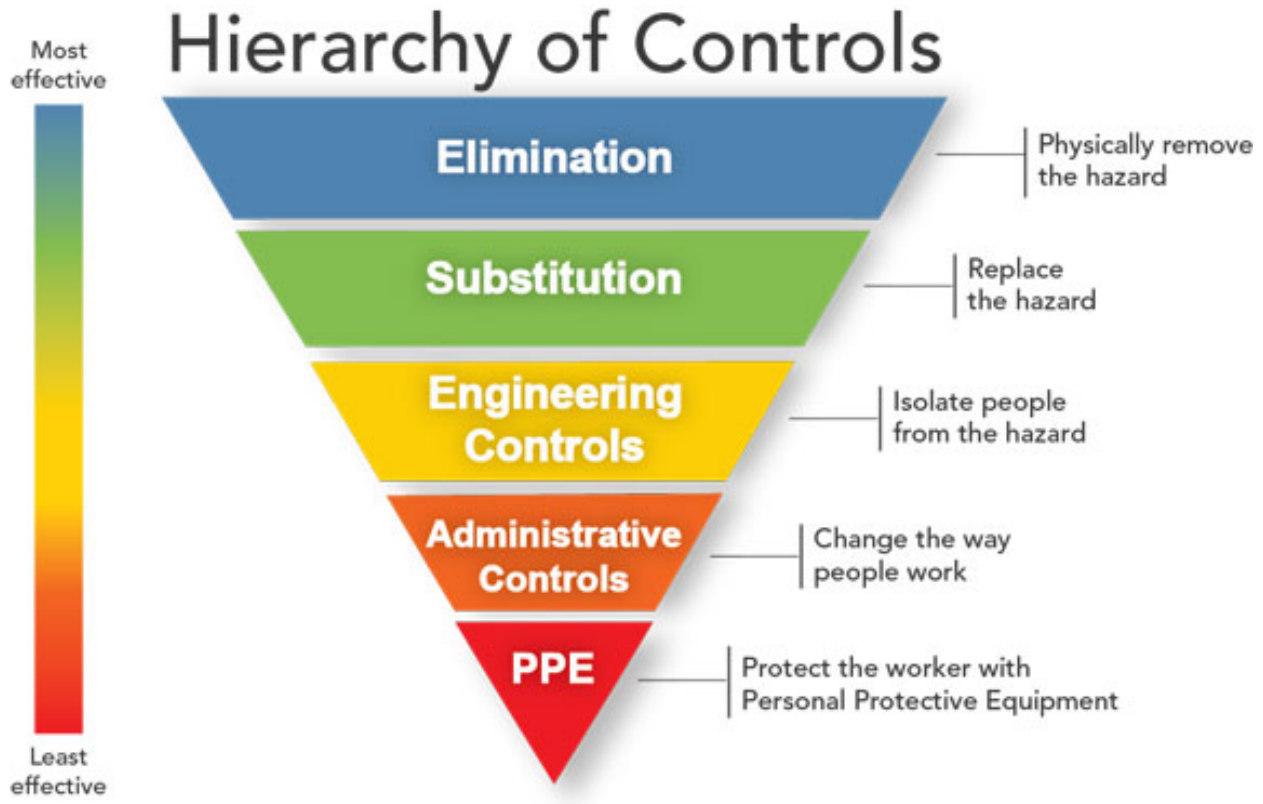
Exposure Risk Categories (cont.)

- High Exposure Risk
  - Tasks with high potential for exposure to known or suspected sources of COVID-19
  - Workers could include: licensed health care professionals, medical first responders, nursing home employees, law enforcement, correctional officers, or mortuary workers
- Very High Exposure Risk
  - Tasks with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures
  - Workers could include:
    - Healthcare workers (doctors, nurses, dentists, paramedics, EMTs) performing aerosol-generating procedures on known/suspected COVID-19 patients
    - Healthcare or Laboratory workers collecting or handling specimens from known/suspected COVID-19 patients
    - Morgue workers performing autopsies on bodies of people who are known/suspected of having COVID-19 at the time of their death

COVID-19 Preparedness & Response Plan

MIOSHA Sample COVID-19 Preparedness & Response Plan for Low-Med Risk Employees

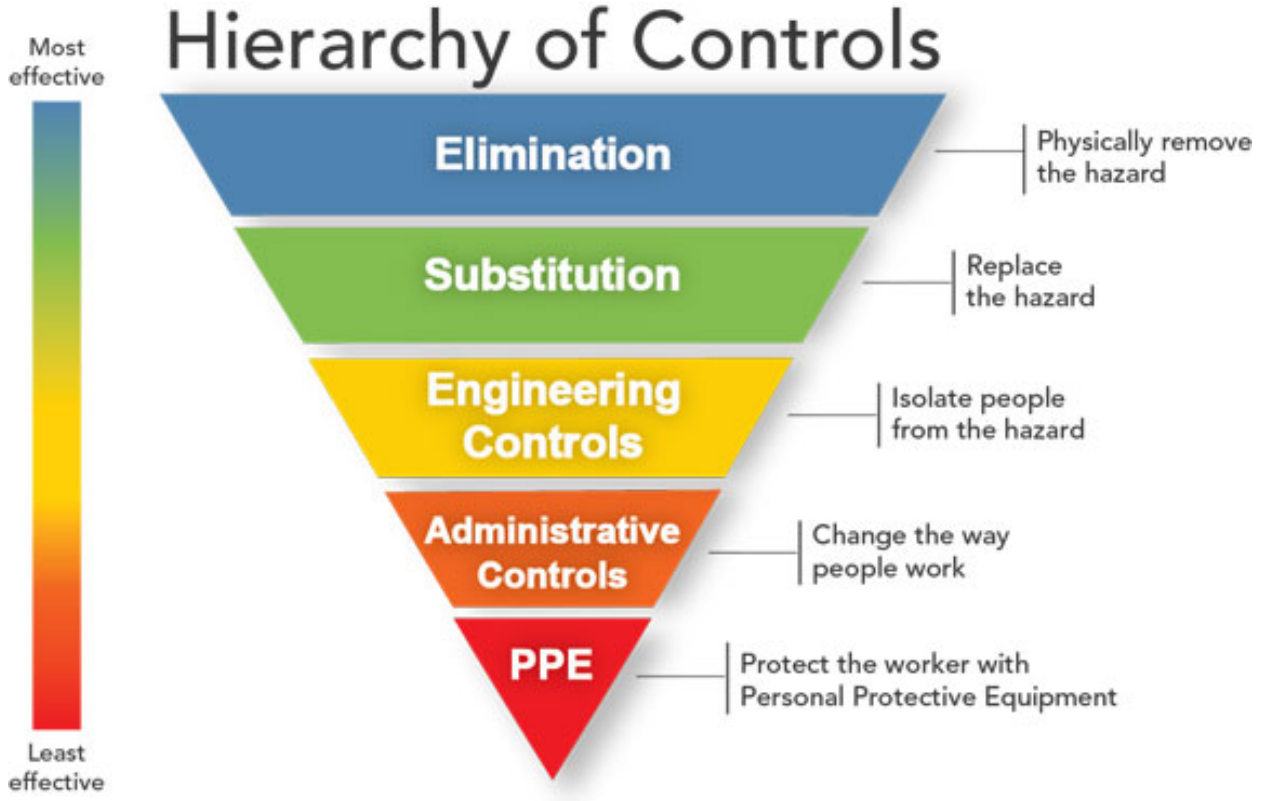
- ❑ Develop & Implement a written COVID-19 Preparedness & Response plan
- Use current OSHA guidance for COVID-19 - Guidance on Preparing Workplaces for COVID-19
- Use current CDC COVID-19 guidance
- The preparedness & response plan **shall** include the employee exposure determination & **shall** detail measures to prevent employee exposure, including any:
  - Engineering Controls
  - Administrative Controls
  - Basic Infection Prevention Measures
  - Person Protective Equipment
  - Health Surveillance
  - Training
- The employer **shall** make the preparedness & response plan readily available to employees & their representatives (website, internal network, or hardcopy)



COVID-19 Preparedness & Response Plan

- Examples of Engineering Controls
  - High-efficiency Air Filters
  - Increased Ventilation Rates
  - Physical Barriers – Clear plastic barriers, sneeze guard, plexiglass
  - Installing a drive-thru window

COVID-19 Preparedness & Response Plan



- Examples of Administrative Controls
  - Restrict non-essential business travel
  - Encourage hand washing and use of hand sanitizer through posters and training
  - Promote remote work
  - Implement rotational shift schedules to reduce the number on employees onsite at the same time
  - Stagger meal and break times
  - Use posters, signs, barriers, or floor markings to reduce congestion

Basic Infection Prevention Measures

- The employer **shall**:
  - Promote frequent & thorough handwashing, including by providing workers, customers, & worksite visitors a place to wash hands; Provide antiseptic hand sanitizer or alcohol-based hand towelettes containing 60% alcohol when soap & water are unavailable
  - Require workers who are sick to not report to work or work in an isolated location
  - Prohibit workers from using other workers' phones, desks, offices, or other work tools & equipment when possible
  - Create policy prohibit in-person work for employees to the extend that their work activities can feasibly be performed remotely

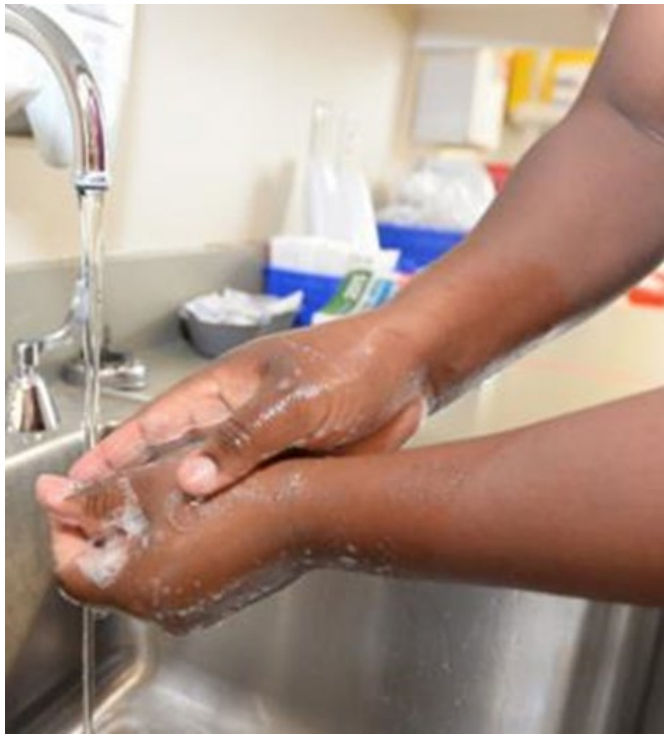


Photo: U.S. Department of Defense

Basic Infection Prevention Measures (cont)

- The employer **shall**:
  - Increase facility cleaning & disinfection to limit exposure to SARS-CoV-2; focus on:
    - High touch surfaces (e.g. door handles)
    - Parts, products, and shared equipment (e.g tools, machinery, and vehicles)
  - Use EPA approved disinfectants expected to be effective against SARS-CoV-2: List N
  - Follow manufacturer's instructions for cleaning & disinfection products (e.g. concentration, application method, contact time, and PPE)

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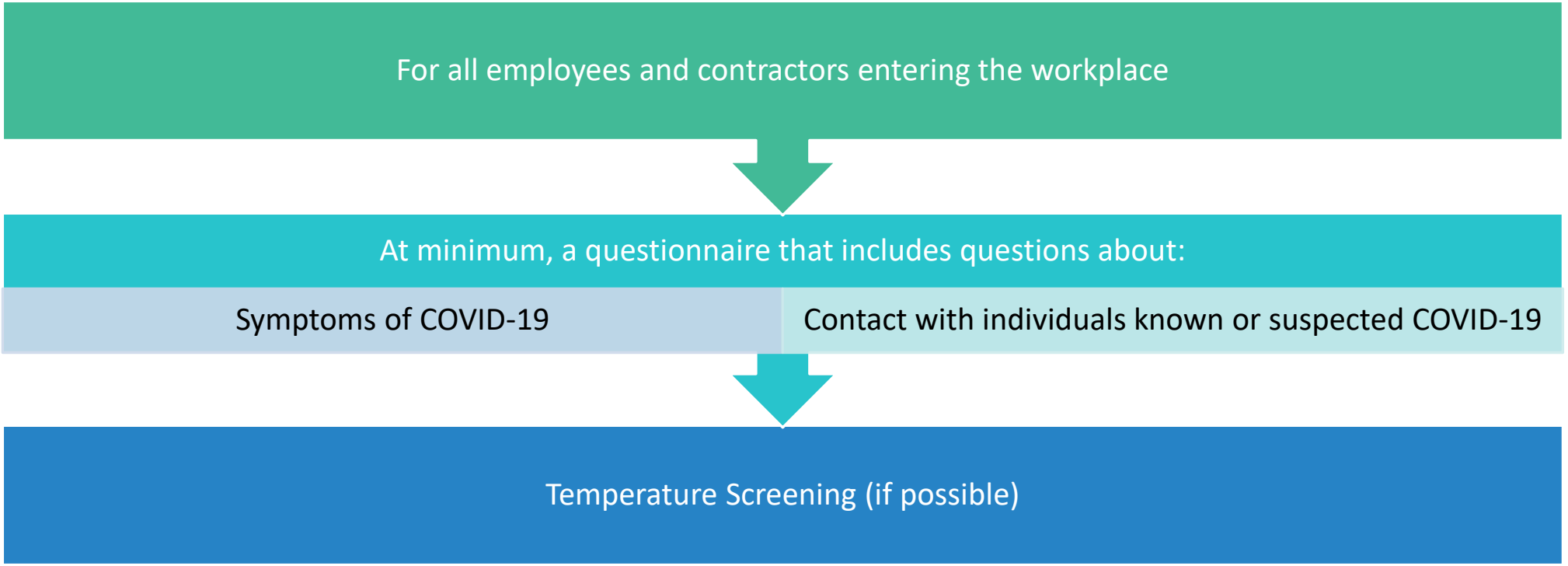
Basic Infection Prevention Measures (cont.)

General Information

- Cleaning
  - The removal of germs, dirt, and impurities from surfaces. Removes, but does not kill germs
  - Use soap & water
- Disinfecting
  - The use of chemicals to kill germs on surfaces. Does not necessarily remove germs from a surface
- Common Disinfectants
  - EPA List N: Disinfectants for Coronavirus
  - Bleach Solution - ⅓ cup bleach per gallon water or 4 teaspoons bleach per quart water
  - 70% alcohol solutions may also be used – wipes or liquid

Health Surveillance

- The employer **shall** conduct a daily entry self-screening protocol



Health Surveillance (cont.)

- The employer **shall**:
  - Direct employers to promptly report any signs & symptoms of COVID-19 their experiencing to the employer before OR during the work shift
  - Physically isolate any employees know or suspected to have COVID-19 from the remainder of the workforce, using measure such as, but not limited to:
    - Not allowing known/suspected cases to report to work
    - Sending know/suspected cases away from the workplace
    - Assigning known/suspected cases to work alone at a remote location (e.g. their home), as their health allows

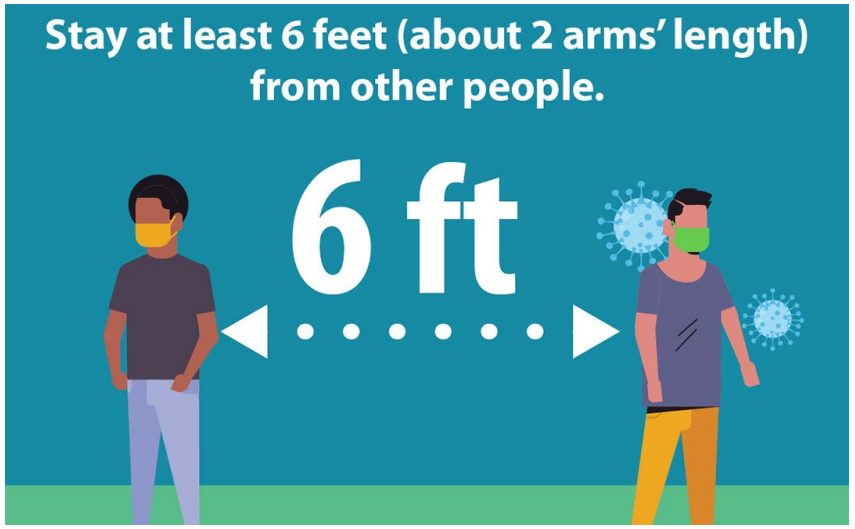
Health Surveillance (cont.)

- When an employer learns of an employee, visitor, or customer with a known case of COVID-19, the employer **shall**:
  - Immediately notify the local public health department AND
  - Within 24 hours of learning of the known case, notify any co-workers, contractors, or suppliers who may have come into contact with the person with a known case of COVID-19
- Employer **shall** allow employees with a known/suspected case of COVID-19 return to the workplace only after:
  - The individual is no longer infectious according to the latest guidelines from the CDC AND
  - The individual is released from any quarantine or isolation order by the local public health department

- CDC Guidance for Return to Work for Persons with COVID-19 Not in Healthcare
- CDC Guidance for Return to Work for Healthcare Personnel with COVID-19

Workplace Controls

- The employer **shall** designate one or more worksite COVID-19 safety coordinator
  - COVID-19 Safety Coordinator
    - Must Implement, monitor, & report on the COVID-19 control strategies required for the worksite
    - Must remain on-site at all times when employees are present on site
    - An on-site employee may be designated to perform the COVID-19 safety coordinator role
- The employer **shall** place posters in the languages common in the employee population that encourage staying away from work when sick, cough & sneeze etiquette, and proper hand hygiene practices

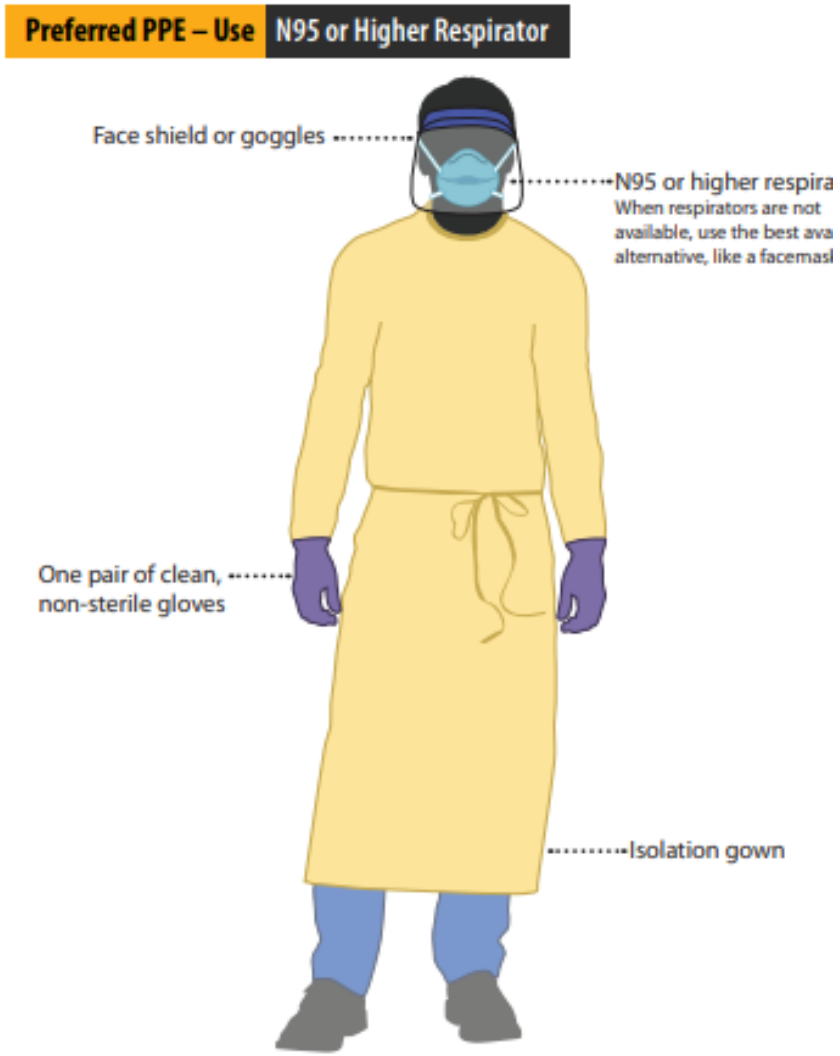


Workplace Controls (cont.)

- The employer **shall**:
  - Keep everyone on the worksite at least 6ft from one another and reduce congestion
    - Use ground markings, signs and physical barriers as appropriate to ensure social distancing and reduce congestions
  - Provide non-medical grade face coverings to their employees
  - Require face coverings when employees cannot consistently maintain 6ft of separation from others
  - Consider face shields (in addition to face coverings) when employees are unable to consistently maintain 3ft of separation from others
  - Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways

Personal Protective Equipment (PPE)

- The employer **shall**:
- Provide employees with types of PPE, including respirators as necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job
- Ensure PPE is:
  - Properly worn
  - Used consistently
  - Regularly inspected, maintained, and/or replaced (as necessary)
  - Properly removed, cleaned, and stored or disposed of to avoid contamination to self, others, or the work environment



Personal Protective Equipment (cont.)

- In establishments that provide medical treatment or house know/suspected cases of COVID-19, the employer **shall** ensure that employees in frequent or prolonged close contact with such cases are provided with and wear, ***at a minimum***:
  - N-95 respirator
  - Goggles or face shield AND
  - Gown

Face Coverings vs Respirators

COVID-19
FACEMASKS VS. RESPIRATORS

	Cloth or Paper Face Mask	Surgical Face Mask	Filtering Facepiece Respirator (e.g. N95)
Testing & Approval	Not tested or approved, but recommended by the CDC	Cleared by the U.S. Food and Drug Administration per 21 CFR 878.4040	Evaluated, tested and approved by NIOSH per 42 CFR Part 84
Intended Use & Purpose	To prevent transmission of the virus between people in close proximity	A fluid resistant barrier designed to protect the wearer from large droplets, splashes or sprays of bodily or other hazardous fluids.	Reduces the wearer's exposure to small particle aerosols and large droplets

COVID-19
VOLUNTARY VS. REQUIRED RESPIRATOR USE

The employer determines the necessary PPE required for the job task(s). The employer is responsible for payment, replacement, maintenance, cleaning, laundering and disposal of PPE. Training should be provided to employees regarding proper use, limitations, care and maintenance of PPE. Where respirators are provided, the following table outlines additional requirements:

Guidelines for Employees Using Respiratory Protection

Filtering Facepiece Respirator (e.g. N95)		
	Required	**Voluntary**
Fit Testing	Yes	No
Medical Evaluation	Yes	No
Facial Hair Prohibited	Yes	No
Appendix D Provided	No	Yes
Training per 1910.134(k)	Yes	No
Cleaning, Storage & Maintenance of Respirator	Yes	Yes

- Know the difference between cloth face coverings and respirators
- NIOSH Certified Respirators require compliance to the Respiratory Protection Program
- Facemasks vs Respirators Factsheet
- Voluntary vs Required Respirator Use Factsheet

Respirator Information

- MIOSHA Part 451 Respiratory Protection Key Program Elements
  - NIOSH Certified Respirators
  - Written Program – MIOSHA Sample Program
  - Medical Evaluation
  - Fit Testing
- Voluntary use respirators require a respiratory protection program
  - The respirator worn will prescribe which program elements are required for voluntary use
  - Use resources to evaluate program requirements - OSHA Small Entity Compliance Guide to Respiratory Protection
- Stay updated to temporary enforcement guidance given by OSHA Enforcement Memos for COVID-19

Employee Training

- Employer **shall** provide:
  - Training to employees on SARS-CoV-2 and COVID-19
  - Communication and training on COVID-19 infection control practices in the primary languages common in the employee population
  - Updated training if:
    - There are changes to its COVID-19 preparedness & response plan OR
    - New information becomes available about the transmission of SARS- CoV-2
- Training **shall** cover:
  - Workplace infection control practices
  - Proper use of PPE
  - Steps employees must follow to employer of COVID-19 symptoms or a suspected or confirmed case of COVID-19
  - How to report unsafe working conditions

Recordkeeping

- Employers **must** maintain a record of the following:
  - Training; maintain all COVID-19 employee training
  - Screening Protocols; maintain a record of screening for each employee or visitor entering the workplace
  - Records of Required Notifications; maintain record of notifications associated to confirmed cases of COVID-19 in the workplace (see Rule 6 for health surveillance)
- Employers **must** maintain records for one year from time of generation

MIOSHA Emergency Rules for COVID-19

ADDITIONAL REQUIREMENTS AND RESOURCES FOR MEAT AND POULTRY PROCESSING

Daily Entry Screening Protocol **(Required)**

Conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.

Create at least one dedicated entry point at every facility for daily screening , described above.

Ensure physical barriers are in place to prevent anyone from bypassing the screening.

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Provide Face Coverings or Disposable Masks **(Required)**

The employer is required to provide clean face coverings or disposable mask options for employees to use when the coverings become wet, soiled, or otherwise visibly contaminated over the course of a workday.

Ventilation Recommendations

Meat and Poultry Processing Industry

- The food industry, in addition to protecting their workers, has the added responsibility to ensure the food safety of the products they produce.
- Any HVAC modifications considered should be discussed with a qualified HVAC Contractor, to ensure they are appropriate for the site's system and compliant with food safety requirements.

Ventilation Recommendations (ASHRAE)

General/Non-Healthcare Buildings* –

- **Increase outdoor air ventilation** (disable demand-controlled ventilation and open outdoor air dampers to 100% as indoor and outdoor conditions permit)

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- Improve central air and other HVAC filtration to **MERV-13 or the highest level achievable**
- Keep systems running longer hours (24/7 if possible)
- **Add portable room air cleaners with HEPA or high-MERV filters with due consideration to the clean air delivery rate (CADR)**
- Maintain temperature and humidity as applicable between 40% - 60%

***NOTE: Any HVAC modifications considered should be discussed with a qualified HVAC Contractor.**

Ventilation Recommendations (ACGIH Industrial Ventilation Committee)

General Industrial site HVAC systems* -

- **Increase the amount of outdoor air supplied by the system to the maximum capacity permitted** by the system. Additional considerations include climate and local air quality (e.g., humidity)
- If air is recirculated, a **MERV 13 or better filter** (system permitting) is recommended to improve the capture of infectious aerosols.
- Depending on the actual air exchange rate and number of occupants, it may be appropriate to **operate the HVAC system for an extended period of time, after all occupants have departed**, to ensure adequate clearance of infectious particles.
- **Avoid having personal or pedestal fans blow from one person to another.**

***NOTE: Any HVAC modifications considered should be discussed with a qualified HVAC Contractor.**

Ventilation Recommendations* (ACGIH Industrial Ventilation Committee) – (Cont.)

- **Provide additional dilution ventilation** – Introduce at low velocities at floor level whenever possible, with directed flow toward exhaust fans above, and spread over large areas.
- Allow the ventilation system to operate continuously if the building is occupied or long enough to allow for several complete air changes following the departure of all building occupants.
- If the system is shut down or set back overnight, return to full operating conditions prior to occupant return.
- **Make sure restroom fans operate continuously** and are exhausted directly outdoors with exhausts away from facility ventilation supply intakes.
- Temporarily disable or **discontinue use of hand dryers in restrooms** and replace with disposable paper towels.

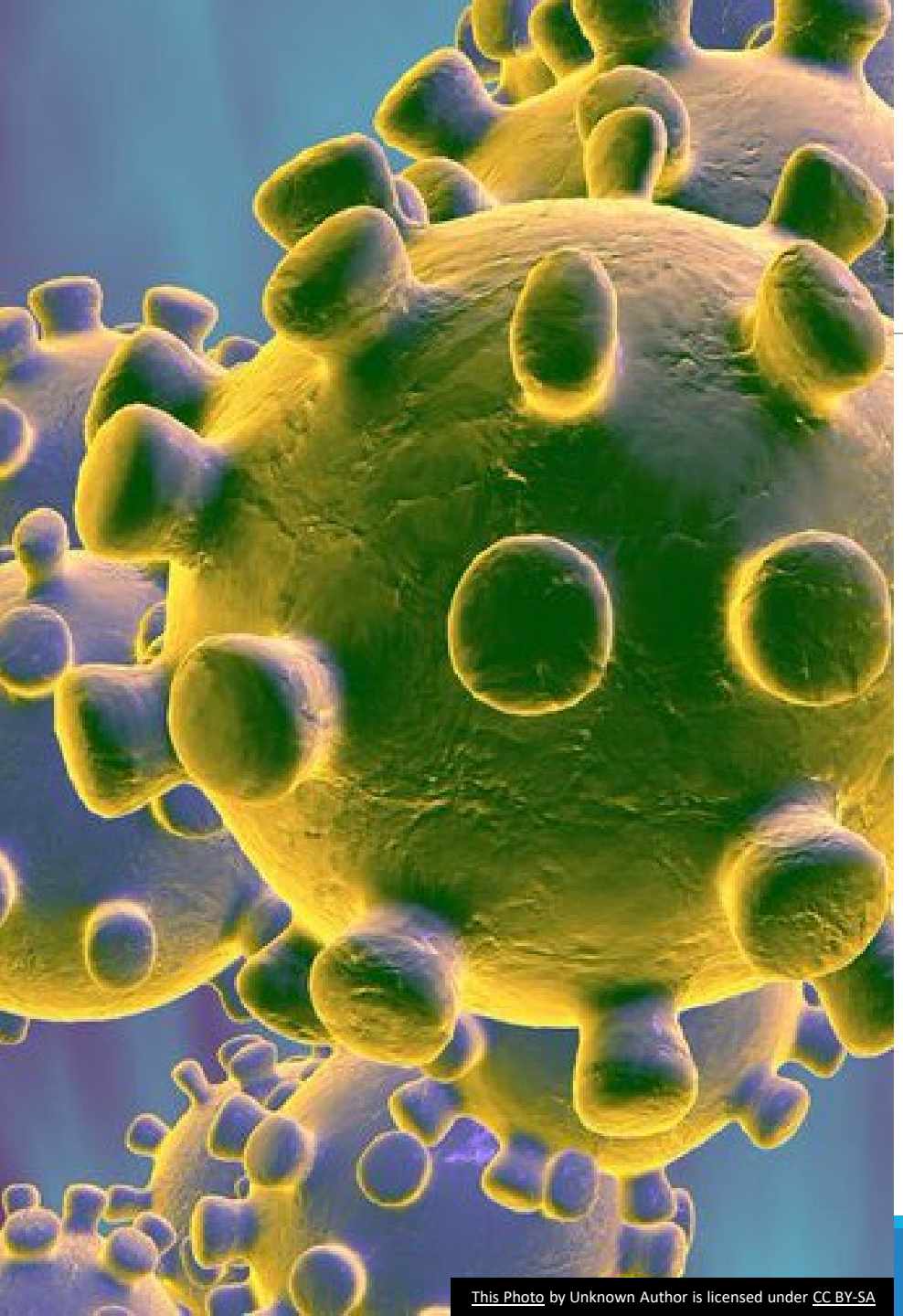
***NOTE: Any HVAC modifications considered should be discussed with a qualified HVAC Contractor.**

Operations Recommendations

- Reduce processing capacity or
- Modify the processing or production lines and/or
- Stagger workers across shifts to minimize the number of employees in the facility at any one time.
- Group employees together in cohorts, if feasible, in a manner that allows a group of employees to be assigned to the same shifts with the same coworkers, so as to minimize contacts between employees in each cohort.

Workplace Recommendations

- Stagger employees' arrival, departure, break, and lunch times to avoid congregations of employees in parking areas, locker rooms, lunch areas, and near time clocks.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Recommended Policies & Procedures – Sick and Leave

- Adopt sick leave policies that discourage employees from entering the workplace while sick and modify any incentive programs that penalize employees for taking sick leave.
- If an employee becomes or reports being sick, disinfect the workstation used and any tools handled by the employee.

Resources – CDC/OSHA Meat & Poultry Processing

CDC Webpage for Meat & Poultry Processing Workers & Employers

Meat and Poultry Processing Facility Assessment Toolkit

Meat and Poultry Processing Workers and Employers – Interim Guidance from CDC and the Occupational Safety and Health Administration (OSHA)

OSHA Poster - 9 Steps to Reducing Worker Exposure to COVID-19 in Meat, Poultry, and Pork Processing and Packaging Facilities

(poster available in 17 different languages)

Meat and Poultry Processing Facilities:
Key Strategies to Prevent COVID-19 Infection among Employees

Accessible version: https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html

Employers should assess their workplace for factors that might increase the risk of spreading COVID-19. Develop a health and safety plan using the following prevention guidance. Reach out frequently to state and/or local public health officials and occupational safety and health professionals to get relevant and up-to-date information concerning COVID-19 in your area.

- **Keep employees at least 6 feet away from each other as much as possible (encourage social distancing).** Use physical barriers or partitions, reduce staffing, or modify workstations or work procedures to increase the distance between employees. Add additional clock in/out stations, space out chairs in break rooms, and add outside tents for breaks.
- **Increase frequency of cleaning and disinfection and make sure there is adequate ventilation in shared spaces.** Clean and disinfect tools or other equipment at least as often as employees change workstations. Disinfect frequently touched surfaces in workspaces, break rooms, and shuttle buses or vans if used, at the end of each shift, or more frequently. Redirect or remove fans to prevent air from blowing directly from one worker to another. If fans are removed, employers should take steps to prevent heat hazards.
- **Screen employees for potential COVID-19 symptoms before they enter the workplace.** Consult with state and local health officials and occupational medicine professionals on screening procedures. Send employees with symptoms home immediately, encourage them to self-isolate at home (if possible), and contact a healthcare provider. Provide information on when they can return to work.
- **Promote proper hand hygiene.** Provide access to running water, soap, paper towels, and trash cans (no-touch trash cans if available). Have employees wash hands for at least 20 seconds. Place hand washing or hand sanitizer stations in multiple locations. Provide alcohol-based hand sanitizer that contains at least 60% alcohol.
- **Encourage sick employees to stay home.** Develop policies that allow sick employees to stay at home without loss of incentives. Ensure employees are aware of and understand these policies. Work with occupational medicine professionals to develop policies for workers who may be at increased risk related to COVID-19.
- **Encourage employees to practice social distancing.** Stagger break times and arrival and departure times. Place visual reminders (floor markings and signs) where employees might gather, including work areas, break areas, locker rooms, halls or corridors, and entrances and exit areas. Encourage employees to avoid carpooling to and from work. If carpooling is necessary, limit the number of people per vehicle as much as possible. This may require using more vehicles. Encourage employees in a shared van or car space to wear cloth face coverings.
- **Consider providing cloth face coverings and/or face shields.** Ensure face coverings are worn properly (snugly over the nose and mouth). Provide washable coverings with multiple layers of fabric. Replace when wet, dirty, or contaminated. Face coverings are not a substitute for recommended or required PPE such as respirators or medical facemasks. Train employees on how to put on and take off PPE without contaminating themselves. Clean and disinfect face shields after each shift if used. Make sure face shields extend past the chin and wrap around the sides of the face.
- **Educate and train employees and supervisors on how they can reduce the spread of COVID-19.** Cover topics like staying home when sick, social distancing, how to wear cloth face coverings, and proper hand hygiene. Provide materials in an easy to understand format and in appropriate languages. CDC has posters available for download.

CDC

cdc.gov/coronavirus

Resources – CDC/OSHA Meat & Poultry Processing (cont.)

Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19

Testing Strategy for Coronavirus (COVID-19) in High-Density Critical Infrastructure Workplaces after a COVID-19 Case Is Identified

Quick Reference Guides (1-2 pages):

- Key Strategies to Prevent COVID-19 Infection Among Employees
- Tips for employees
- Available in multiple languages

Resources - U.S. Food and Drug Administration

What to Do if You Have COVID-19 Confirmed Positive or Exposed Workers in Your Food Production, Storage, or Distribution Operations Regulated by FDA

Use of Respirators, Facemasks, and Cloth Face Coverings in the Food and Agriculture Sector During Coronavirus Disease (COVID-19) Pandemic

COVID-19 Resources

State of Michigan

- Coronavirus
- Emergency Epidemic Orders
- Michigan Coronavirus Resources
- Michigan Safe Start Map

MIOSHA

- COVID-19 Interim Enforcement Plan
- Workplace Safety Guidance for COVID-19
- Sample COVID-19 Preparedness & Response Plan

OSHA

- COVID-19 Information
- Guidance on Preparing Workplaces for COVID-19
- Enforcement Memos for COVID-19
- Interim Guidance for Specific Industries

CDC

- Coronavirus Disease (COVID-19)
- Guidance for Businesses & Workplaces
- Return to Work Guidance for Individuals with COVID-19 Not in Healthcare
- Guidance for Cleaning & Disinfecting
- General Business FAQs
- Healthcare Workers FAQs

Other

- AIHA – Back to Work Safety Industry Specific Recommendations

MIOSHA Resources

- MIOSHA Webpage
- MIOSHA Consultation, Education & Training (CET) Division
- MIOSHA Standards
- Request for Consultative Assistance
- PPE Guide for General Industry (SP #16)
- Respiratory Protection Program – Sample Written Program (SP #05)
- Hazard Communication Program – Sample Written Program (CET 5530)
- MIOSHA Training Program

Contact MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)

530 W. Allegan Street, P.O. Box 30643

Lansing, Michigan 48909-8143

If you need further information regarding COVID-19

Call 855-SAFEC19 (855-723-3219).

To request consultation, education and training services, call 517-284-7720

or visit our website at:

www.michigan.gov/miosha

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC OPPORTUNITY

MIOSHA Michigan Occupational Safety and Health Administration