

As of 5/15/2020 at 11am

**Department of Labor and Economic Opportunity** 

Employer guidance on best practices: Manufacturing

PRELIMINARY AND PRE-DECISIONAL | MAY 15<sup>TH</sup>, 2020



# Eight steps for employers to keep their workers safe, within the hierarchy of controls





**Administrative controls** 



2 Access control



3 Distancing



4 Sanitation



5 Hygiene



6 PPE



Positive case protocols



8 Facility closure

## **Administrative controls**





# **1** Administrative controls

### Create an exposure control plan

- Document and share written exposure control plan to mitigate employee exposure
- This plan should include an exposure risk determination for all employees, and detail measures employer will take to prevent exposure, including:
  - Administrative controls, including access
  - Engineering controls, including any steps taken to physically reconfigure the workspace and workflows
  - Policies governing social distancing
  - Policies governing personal hygiene
  - Policies governing cleaning and disinfection
  - Policies governing personal protective equipment
  - Policies governing
- The exposure control plan should incorporate the latest guidance for COVID-19 from the Center for Disease Control and Prevention (CDC), and any federal requirements issued by: federal, state, county, and municipal authorities; employers; and project owners
- The exposure control plan may differentiate between workers commensurate with their exposure risk, with more stringent measures for higher risk categories

## Administrative controls







### **Establish response owners**

- A central point of contact should be identified for implementation of the exposure control plan and coordination with stakeholders (including relevant labor union)
- At minimum, one COVID-19 response manager should be identified for every individual facility and project
- If feasible and depending on size of worksite, consider dedicating staff to virus response (sole or primary responsibility)

## Define the scope of the response team, including:

- Design, implement, and report out to management on workplace risk mitigation program
- Create and complete a "health checklist" or daily symptom tracking survey
- Establish points of contact and appropriate communications cadence with relevant labor union and state and local public health agencies
- Work with the relevant labor union to improve safety protocols and to ensure robust enforcement and reporting of workplace health / safety events
- If feasible, leverage a digital tool or dashboard to track implementation of protocols and opportunities to tighten or improve

## **Administrative controls**







## **Train employees**

- Employers should develop training materials and schedule training time with all employees prior to return to work
- Employers should conduct this training module at all facilities / on all jobsites, before resumption of work, and consider sharing guidelines with workers in advance of return
- The curriculum of this training should:
  - Explain all elements of the exposure control plan, with specific guidance on access control, distancing, sanitation, hygiene, and use of personal protective equipment
  - Include demonstration of proper use of personal protective equipment, including donning and doffing
  - Explain worker's rights and protections, including access to leave, and specify the steps that the employee can take if they feel unsafe in the workplace; this includes informing vulnerable workers of their ability to draw down UI benefits instead of returning to work
  - "Translate" guidance to applicable situations encountered during everyday work
- Training should be jointly led by the ranking manager on the jobsite, a labor union representative, and designated members of the COVID-19 response team
- Subsequent training may be necessary to update employees on evolving guidance / policy
- Employers should conduct periodic Q&A with team members to answer questions

## Administrative controls: example



Illustrative

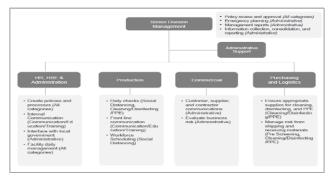




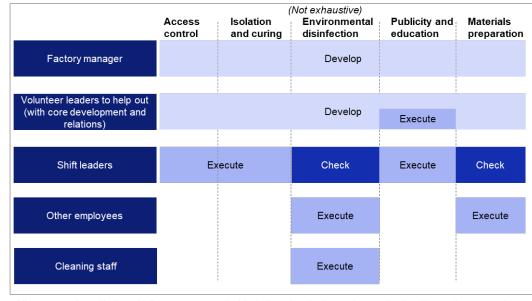
#### Establish team or roles

#### Example: Large/medium plan





#### Example: Small factory/job shop plan



All team members likely to dedicate some not all of their time developing and executing health practice precautions

## **Access control**







### Reduce congestion at start times and entry points

- Employers should assign dedicated entry point(s) for all employees or groups to reduce congestion at main entrance, help with screening needs, and help with tracing
- Employers should label queue spots with X's outside building in case of congestion
- If feasible, employers should consider staggering start times for locations to ensure social distancing and effectiveness of screening protocols (50/50 rotational schedules)

### Screen employee health / exposure:

- Employers should conduct daily entry self-screening protocol for all employees i.e., symptom tracking and exposure questionnaire, with HR team prepared to receive and respond to alerts
- Employers should screen worker temperatures as a condition for daily site entry
- Workers should be barred entry if they have a fever (100.4'F based on temperature checks);
   or otherwise if the employee identifies coughing, or shortness of breath each day before leaving for work, before the shift, mid-shift, and at end of shift
- Employers should ensure physical barriers are in place to prevent anyone from bypassing health screenings and entering the facility
- If feasible, and more likely long term, on-site partnerships with state and local healthcare to facilitate rapid diagnostic testing should be considered

## **Access control**





2 Access control

### Control site access for non-employees

- Employers should bar all non-essential visitors and contractors from the worksite
- Employers should require that essential visitors and contractors should schedule their visits ahead of time and attain explicit approval before arrival (e.g., conduct visitor questionnaire virtually and deny visitors who do not meet requirements)
- Employers should control site access (e.g., restrict visitors, contractors, deliveries –
  implement screening practices similar to employees), or in the alternative issue stickers or
  other indicators to workers to show that they received a screening before entering the
  worksite that day

## **Access control**







### **Restrict business and personal travel**

- Employers should only permit business critical travel
- Employers should reduce risk from contractors by restricting unnecessary movement between project sites and establishing minimal handoff deliveries
- Employers should require 14-day quarantine after returning from any necessary personal travel (confirm with site leader upon return)

### If possible, modify transportation practices

- If transportation is employer owned / managed, employer should consider utilizing assigned seating to simplify contact tracing should an employee be diagnosed as COVID-19 positive
- Employers should work with transportation provider(s) to review health screening (reducing shift changeover time) and disinfection protocols for seats and other common surfaces

## **Access control: example**



#### Illustrative





**Access control** 

#### Stagger timing and/or designate point(s) of entry











#### Screen employee health/exposure (home, entrance)



#### Daily Self-Screening

Our company is concerned for your safety and the safety of your co-workers. We are monitoring the development of Coronavirus. In the interest of ensuring a safe and healthy work environment, we recommend that you voluntary monitor your health status by carefully completing this self-assessment each day before coming to work.

#### Survey to be completed daily by active employees before coming to work:

1. Have you had physical exposure to a person suffering from Coronavirus symptoms as noted below.

If you answered Yes, please contact Human Resources prior to coming to work so that a determination can be made whether you should remain offsite from any company facility for 14 days following the last potential exposure to the COVID-19. You may be required to submit evidence of exposure to an infected person. Should you be required to remain offsite, you should keep in contact with an HR representative and receive clearance from HR before returning to the company premises. You may also be required to have written clearance from a

- 2. If you have been asked to perform daily checks due to COVID-19 becoming more prevalent in your area, or believe you have been exposed to COVID-19: Do one or more of the following common COVID-19 symptoms below currently apply to you?
- Temperature >38°C (100.4 0F) or higher
- · Frequent unexplained cough
- · Unexplained shortness of breath or difficulty breathing
- · Unexplained tiredness

If the answer to question 2 is YES, you may have symptoms of COVID-19. We ask you to please contact your Human Resources representative, seek medical attention and remain off company property for 14 days following cessation of symptoms and written clearance by a Doctor. Please keep in continuous contact with your HR representative.

#### If the answer to all the above questions is NO:

Please adhere to local HR guidance regarding your work schedule and any special precautions to be taken.



## **Access control: example**



#### Illustrative

## 2 Access control

#### Screen all visitors with similar protocol

#### Visitors & Contractors COVID-19 Self-Screening Checklist

The asfety of our employees, customers and violator, remains Leaf's primary concern. As the across virus (COVID-19) outseek continues to evoke and spread globally, Lear is monitoring the situation abosely and will pesid

To help prevent the spreed of COVID-19 and reduce the potential risk of exposure to our employees and visition no are conducting a simple someting questionnairs. Your participation is important to help us take precautionery measures to protect you and everyone in the building. Thank you for your time and on-operation.

Visitor's Name:	Mobile phone number:	
Visitor's Company / Organization:	Name of Lear Host	
Facility Name:		

	Self – Declaration by Visitor
1	How you returned from any COVID-10 affected area within the post 14 days? (Sie EMS to provide surror (shind)  If Yes I No
2	Have your immediate family or others to which you have frequent contact returned from any COVID-19 effected area within the leat 14 days?  ☐ Yes ☐ No
3	Have you had close contact with or cared for anyone clagnosed with COVID-18 within the lest 1 days?  □ You □ No
4	Are you showing any signs of one or more of the following symptoms?  Temperature >35°C (100.4 °F) or higher, cough, shortness of breath, difficulty breathing, liredness?  O Yes  O No
4 gre	Temperature >38°C (100.4 °F) or higher, cough, shortness of breath, difficulty breathing,
gre	Temperature 358°C (100.4 °F) or higher, cough, shortness of breath, difficulty breathing, litedness?   © Yes
gre gre	Tangasture 3:55°C (100.4 °F) or higher, cough, shortness of breath, difficulty breathing, tiredness?   One  One  One  One  One  One  One  On

#### Example signage





Please REMOVE Glasses and Hats when preparing for Temperature Scanning.
Thank You!







- International Air Travel or cruise in Last 14 Days?
- Close Contact with Diagnosed COVID19 Patient in Last 14 Days?
- Currently have Fever, Chills,
   Cough, Difficulty Breathing,
   Headache, Sore Throat, Muscle/
   Joint Aches, Diarrhea, Abdominal
   Cramps or Nausea?

Protect Yourself and Others!

Please do NOT come to work.

Notify your Supervisor of Absence.

If you experience any symptoms while at work, please report them immediately to the site Health Center or call GSIC at 800-814-3390 speak with the GM Physician on call.

## **Social distancing**





## 3 Social distancing

### Increase distance between people

- Employers should establish sitewide requirement for social distancing in accord with CDC guidelines (6 ft) [When 6 ft distancing is not feasible, workers are at higher risk; see PPE section for additional guidance]
- Employers should create communication channels for policy updates (e.g., communication from CEO, building guidance)
- Employers should eliminate occasion for interactions with visitors or the general public

## Limit use of common spaces

- Employers should identify (with signage) and consider closure / occupancy limits for common choke points where workers are forced to stand together, such as hallways, cafeterias
- Employers should require physical distancing in lunch and break areas and provide physical markers (e.g., tape on the ground to assist)
- Employers should limit capacity in dense rooms (e.g., consider closing off every other urinal in restrooms)
- Employers should install touchless waste bins
- Employers should consider turning off shared water fountains, ice makers, restroom hand dryers, and other highly tactile equipment

## **Social distancing**







### Stagger shifts and timing to reduce congestion

- Employers should consider implementing rotational shift schedules (e.g., increasing number of shifts, alternating days of the week) to reduce headcount in facility at any given time
- Employers should consider staggering start times and mealtimes (e.g., by 15 mins)
- Employers should consider limiting stairwells and entry points to one-way flow of traffic, demarcated with signage / visual cues and reinforced by training

### Provide visual cues to reinforce distancing expectations

- Employers should employ visual cues to enforce distancing wherever possible (e.g., tape, ground markings, walking traffic patterns marked, physical barriers, elevator guidelines, signs with social distancing requirements)
- Employers should post signage and train people not to congregate at break areas, toolboxes and tool cribs, lunch areas, etc.

### **Create physical separation barriers**

• Wherever possible, employers should install temporary barriers in areas where workers congregate in normal course of business (e.g., between workstations on an assembly line)

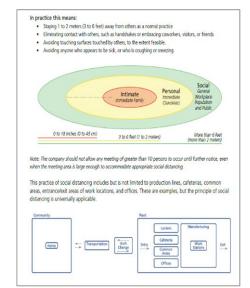
## Social distancing: example

**Social distancing** 



#### Illustrative

#### Increase general distancing between people



#### Limit common space use and operations



## Provide reinforcements (e.g., barriers, X's) for distancing expectations





## Hygiene







## **Provide handwashing / sanitation options**

- Employers should provide soap and running water wherever possible on job sites to permit frequent handwashing
- Alcohol-based sanitizers (greater than 60% ethanol or 70% isopropanol) should be provided as a backup, only in the event that providing supply of running water is impossible
- Employers should provide individual hand sanitizer bottles to workers, and position extra hand sanitizer in areas next to shared tools, equipment, and materials
- Employers should develop policies specifying that handwashing is required for all workers at the start of the shift, breaks, bathroom trips, lunch, team huddles, at the end of the shift, and after any close contact with someone displaying cough or cold symptoms
- Employers should post signage for hygiene (wash hands, cover cough, don't touch face)

## **Sanitation**







### **Conduct more frequent cleaning**

- Employers should fully disinfect workstations and high-touch surfaces prior to site reopen
- Employers should identify responsible for party for cleaning / sanitation by project site (e.g., one person/shift or every worker), and clearly communicate this to employees
- Employers should frequently clean and disinfect high touch surfaces on job sites
  - "High touch surfaces" will include shared tools, machines, vehicles and other equipment, handrails, doorknobs, etc. frequently, per CDC guidelines; for shared items like tools, wipe with disinfectant before being transferred
  - Employers should consider shutting down use of high-touch items that are not essential (e.g., hand dryers or ice machines) if frequent enough disinfection is impractical
- Employers should consider locally ventilating high-density areas, installing high-efficiency filters, and increasing percentage of outside air in HVAC system

## **Sanitation**





5 Sanitation

### Provide cleaning materials and establish protocols

- Employers should provide disinfecting materials, EPA-approved for emerging viral pathogens
- Employers should designate a cleaning protocol for all areas and post specifically and visibly,
   e.g., 2-6x per day (depends on high-touch frequency)
- Employers should close the facility long enough to allow for intensive overnight cleaning
- Employers should communicate expectations of third-party janitorial contractors and independently verify that they are exercising proper protocols

## **Sanitation: Example**



#### Illustrative



**Sanitation** 

#### Conduct frequent cleaning of all high touch areas and post protocols publicly cleaning protocols

**Common Space Cleaning by Housekeeping** 

Between Shifts

Employee Entry/Exit Points

· All Doors, handrails, drinking

· Cafeteria, food service, vending

 All Locker Rooms All Restrooms

fountains, etc.

During Shift

Restrooms

All Entry/Exit Points

Before all breaks

breaks/lunch Available during breaks

Doors, handrails, drinking fountains,

o 3-4x/shift Cafeteria, food service, vending o Before high use

## Establish employee



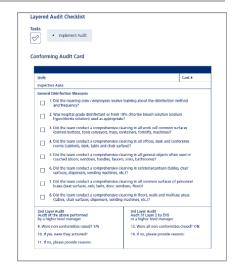




#### Elevate daily cleaning and deep cleaning by 3rd parties



#### Conduct routine checks for cleaning procedures











#### **Enforce PPE use**

- Employers should analyze and understand requirements (consistent with guidance and requirements issued by: Federal, state, county / municipal authorities, employers, owners)
- Employers should require facial coverings for all employees on the site (provided by employer), with potential for a more stringent standard as dictated by risk exposure (e.g., N-95 masks for high risk exposure workers – be attentive to evolving public health guidance)
- Employers should consider face shields for all employees who cannot consistently maintain 6 feet of separation from other employees
- Employers should require that employees use facial coverings before employees approach the facility entrance check point

#### **Distribute PPE**

- Employers should distribute necessary PPE at morning check-in or at building entry
- As appropriate, employers should disinfect / wash facial coverings / masks overnight
- Employers should record and track who has received their masks (e.g., weekly allotment for employees)







### **Ensure stocking**

- Employers should confirm stock of facial coverings, face shields, gloves, and glasses on site and on order with lead time
- Employers should ensure that the site has the ability to collect temperature readings, i.e., by procuring non-contact infrared thermometers or thermal cameras for building entry
- Employers should confirm that the operation has an adequate supply of additional health supplies (e.g., soap, disinfectant, hand sanitizer, paper towels and tissues
- Employers should target no more than 30-day stock of critical supplies (e.g., sanitizer, masks) on site or on order with sufficient lead time, and avoid stockpiling

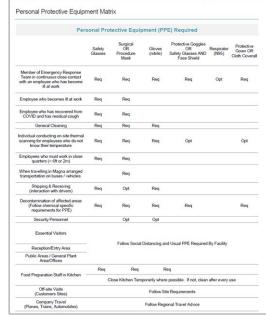
## Provide guidance on PPE

- Employers should provide guidance on PPE use on the worksite (may vary by employee)
- Employers should train employees on the use of PPE (including storage, doffing and redonning facial covering), in addition to the protective triad of hygiene, distancing, disinfection
- Employers should permit voluntary individual use of masks in excess of guidelines
- Employers should coordinate procedures with suppliers and contractors that may be onsite in normal course of operations, to ensure that protocols align
- In case of any conflict between any of foregoing guidance, the strictest measure should apply



#### Illustrative

## Establish standard PPE requirements and distribution methods



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

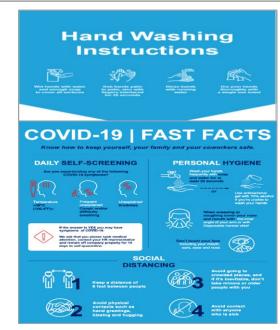
## Ensure PPE and safety supplies (masks, hand sanitizer) are stocked







Provide guidance for PPE usage and reasoning



https://www.cdc.gov/handwashing/when-how-handwashing.html





## **Case monitoring**





## Case monitoring

### **Define protocols for symptomatic employees**

- Employers should ensure that employees with symptoms (based on self assessment, screening etc.) are sent home
- Employers should instruct that sick employees stay home in accordance with most recent Executive Orders
- Employers should ensure protocols are visible in the facility (e.g., post signage to stay at home if specified symptoms occur)
- Employers should ensure isolation protocol and areas established to isolate symptomatic employees prior to sending to medical care or home to self-quarantine
- Employers should identify and train Isolation Coordinator(s) for on-site assistance
- Employers may also provide guidance where appropriate and support for employees (e.g. virtual training, etc.)
- Employers should check in periodically with employee on symptoms and work ability
- Employer should report confirmed cases and outbreaks to state and local public health authorities, including any relevant information on circumstances of transmission and contacts of the infected worker

## **Case monitoring**







### Provide guidance to exposed employees

- Employers should follow CDC response guidelines for exposure cases
- Employers should inform team members and relevant managers of their potential exposure when employee is sent home
- Employers should enact policies to encourage workers to stay home / leave worksite (e.g., temp paid sick leave) when feeling sick, or after close contact with a confirmed positive case
- Employers should trace close contacts of the infected worker within the workplace, for 3-7
  days prior to onset of symptoms (based on where employee was and whether PPE was
  worn). See details on how to qualify "contact" on following page
- Communicate procedures with employees

### Mark off and clean spaces identified in workplace tracing

- Employer should clean appropriate areas based on tracing procedures and CDC recommendations whenever a person has been sent home for symptoms
- Employer should perform a site area deep cleaning/disinfection (e.g., misting) as well as physical disinfection of common tools and surfaces whenever a COVID-19 person has been confirmed at the site
- If feasible, employer should consider leveraging a third-party cleaning service

## **Case monitoring**





## **Case monitoring**

#### Define protocol for symptomatic employees

#### Appendix B - Potential or Confirmed Case Action Plan

Version 7, April 2, 2020

#### ONSITE INCIDENT ACTION PLAN:

This portion of the plan defines the proper procedure for dealing with potential or confirmed cases of COVID-19 on the jobsite. Decisions regarding the possible personal and location/material exposure can be made using the CDC's Guidance of Public Health Management and Decision Making and Environmental Cleaning Guidance

- 1) Isolation of a person presently on site is symptomatic:
- Move potentially infectious people to an isolation area.
  - Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until potentially sick people can be
  - A temporary toilet facility (i.e., port-a-john) is NOT considered an isolation room.
- Provide a facemask and gloves if feasible and available, and instruct the person to wear it.
  - A facemask (also called a surgical mask, procedure mask, or other similar terms) on a patient or other sick person should not be confused with PPE for a worker; the mask acts to contain potentially infectious respiratory secretions at the source (i.e., the person's nose and mouth).
- · Restrict the number of personnel entering isolation area.
- · Personnel who interacted with the ill person(s) must wash their hands
- . Direct the ill employee to leave work and go home or to the health center as advised by the local authority.
  - Public transportation must not be used.

#### If there is a case of COVID-19 on the jobsite, it is essential to

Stay Calm and follow the steps outlined below

- \*\*Situation Assessment (2) and Notification Guidelines (3) should be done concurrently \*\*
- 2) Situation Assessment: If a COVID-19 case is confirmed or deemed a Person Under Investigation (PUI) by a medical professional within the past 14 days for someone NOT currently on site.
- ☐ Verify Date, Time, and Location of Incident
- a. Is the positive case of COVID-19 confirmed to belong to someone from THIS site?
- ☐ Assess risk of Person(s) and Area(s) possibly exposed to COVID-19
  - a. What company did the person work for?
  - b. What day and time was the employee last on site?
  - c. How many employees does that contractor have on site?
  - d. Who else was working with the positive employee?
  - e. Where on the jobsite was the work being performed?
  - f. What materials/equipment were being used by the employee

#### Mark off and clean spaces identified in tracing

- g. Does the subcontractor have an office space and/or break area?
- h. How many other subcontractors performed work in the area occupied by the positive
- o Discuss proper next steps with the safety representative and Incident Commander using the CDC flowchart (attached).
- ☐ Stop Work and Evacuate the office/space occupied by the person(s) who was confirmed positive with COVID-19.
  - o The size of the area to be evacuated will depend on the circumstances and judgement of the incident commander in coordination with the VP of HSE and Project Executive.
  - o Common areas, including meeting rooms, shared equipment (e.g. copiers/printers), restrooms, kitchenette, should be evaluated.
  - o Maintain social distancing during evacuation procedure.

#### Restrict access to the identified affected areas.

- o Smaller areas or rooms: cordon off for cleaning and disinfecting. See cleaning guidelines below.
- o Larger areas: cordon off/isolate the areas the person occupied and any high-touch surfaces the person may have come into contact with (and anything within 6 feet of
- Increase ventilation in larger areas by opening windows/doors and improving airflow if possible. If there is little to no airflow, treat it as a smaller area or room, as described above.

## **Facility closure**





### Enforce appropriate shutdown / cleaning protocols

- Employers should establish site specific response plan for confirmed cases (e.g., investigate, formulate response and cleaning procedures); if a worker goes home from the site with symptoms disinfect the area, supplies, and tools that person worked with immediately.
- Employers should shut down appropriate locations on the site down for deep cleaning (enforce appropriate amount of shutdown time) if there was a confirmed positive case

### **Communicate exposure to employees**

- Employers should conduct workplace contact tracing investigation for confirmed cases and notify those contacted or suspected of being in contact
- Employers should ensure appropriate documentation of positive cases for necessary parties (labor union, health services, health insurance), and record confirmed cases
- Employers should ensure employees who were potentially exposed to a positive case on site
  to monitor symptoms closely and stay home if there was a high risk of exposure or symptoms
  occur (while maintaining employee privacy)