



Memorandum

Date: June 3, 2020

From: Rex Howard, Team Lead, CDC
Kendra Broadwater, CDC National Institute for Occupational Safety and Health
Sophia Chiu, CDC National Institute for Occupational Safety and Health

To: Texas County Health Department and Oklahoma State Department of Health

Subject: Technical Assistance to Oklahoma State Department of Health and Texas County Health Department to reduce SARS-CoV-2 transmission at Seaboard Foods pork processing facility in Oklahoma

Background

On 6 May 2020, the Centers for Disease Control and Prevention (CDC) received a request for technical assistance from the Oklahoma State Department of Health (OSDH) and the Texas County Health Department. The OSDH requested technical assistance for an assessment of strategies to help mitigate SARS-CoV-2 transmission in the Guymon, OK, community, in which Seaboard Foods has a major pork processing plant. The team was invited by Seaboard management officials to conduct a voluntary assessment to augment current efforts and help reduce infections among pork processing facility employees. SARS-CoV-2 is the virus that causes coronavirus disease 2019 (COVID-19).

At the time of the assessment, work attendance was reduced due to a combination of SARS-CoV-2 positive or symptomatic workers in isolation, workers in quarantine following an exposure, and workers in self-quarantine for personal reasons. The goal of the assessment was to identify how the plant had implemented the guidance from CDC and the Occupational Safety and Health Administration (OSHA) entitled "[Meat and Poultry Processing Workers and Employers - Interim Guidance from CDC and the Occupational Safety and Health Administration \(OSHA\)](#)" (CDC/OSHA guidance).

On 14-15 May 2020, the team conducted an onsite assessment of the Seaboard Foods pork processing plant in Guymon, Oklahoma. The team met with the plant management team, along with Texas County Health Department Director Terri Salisbury, and conducted a walk-through of many parts of the plant, which was operating at the time. The team discussed how the CDC/OSHA guidance was implemented at the plant and the steps that had been taken to date to align their practices and protocols with the guidance.

As part of the assessment, the CDC field team used the COVID-19 meat and poultry processing facility assessment checklist to assess this alignment of control measures with CDC/OSHA guidance. The field team consulted with the CDC/NIOSH Virtual Occupational Technical Assistance (VOTA) team on the current status at the Seaboard Foods pork processing plant. The team also conducted interviews with organized labor union officials operating within the plant, as well as some employees.

The team observed that Seaboard Foods has implemented many recommended controls to prevent transmission of SARS-CoV-2 at the workplace per the CDC/OSHA guidance. The team discussed preliminary recommendations with Seaboard Foods. Appendix A is a checklist that provides a brief summary of existing controls and includes recommendations to help Seaboard Foods more closely align their control implementation with CDC/OSHA guidance. The technical assistance was based upon responses and documents provided by Seaboard Foods and should not replace recommendations provided by other public health or regulatory entities including state and local health departments.

Appendix A is not intended to document every observation and intervention at Seaboard Foods. Instead, it is a summary of the plant's implementation of the CDC/OSHA guidance. The CDC Field Team recommendations are intended specifically for the Seaboard Foods Guymon pork processing plant as the implementation of the CDC/OSHA guidance should be tailored and implemented to specifically meet the unique needs of each meat or poultry processing facility and its workers and management.

The recommendations are provided to augment existing controls to help prevent the spread of COVID-19 among workers. The CDC Field Team recommends checking back frequently on the CDC COVID-19 webpages for updated information and guidance on preventing and mitigating the spread of COVID-19 among your workers while they are at work. The team encourages Seaboard Foods, LLC., local health departments, and community partners to continue to communicate and collaborate. Meat and pork processing facilities should consult with United States Department of Agriculture staff to determine if any proposed controls or modifications are acceptable with regards to food safety and sanitation.

Attachment: Appendix A – “Facility Assessment Checklist - Seaboard Foods, Guymon, Oklahoma”

End of Memo

APPENDIX A -- Evaluation of Coronavirus Disease 2019 (COVID-19) Assessment and Control Plans for the Seaboard pork processing facility in Guymon, Oklahoma Using Guidance from the Centers for Disease Control and Prevention (CDC) and Occupational Safety and Health Administration (OSHA)

Meat and poultry processing facilities should utilize the [guidance](#) issued by Centers for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA) for the meat and poultry processing industry in order to operate while preventing the spread of COVID-19.

All meat and poultry processing facilities developing plans for continuing operations in the setting of COVID-19 occurring among workers or in the surrounding community should consider:

- working with appropriate state and local public health officials;
- incorporating relevant aspects of CDC/OSHA guidance, including but not limited to, the CDC's [Critical Infrastructure Guidance](#); and,
- incorporating guidance from authoritative sources or regulatory bodies as needed.

This tool is intended to be used to help determine if facilities are utilizing the CDC/OSHA guidance to implement practices and protocols for operating while safeguarding workers and the community.

Meat and poultry processing facilities should create an overall hazard assessment and control plan for COVID-19 based on elements in the CDC/OSHA guidance. A written COVID-19 Control and Assessment Plan is the basis of the overall workplace response which should link all of the activities and controls needed.

Date of assessment: 14-15 May 2020

Facility Name: Seaboard Foods Processing Plant

Facility Address: 2700 NE 28th Street; Guymon, OK 73942

Point of Contact: Rochelle Leyva, Safety/Worker's Compensation Manager

COVID-19 Control and Assessment Plan

Written plan(s) in place, with these elements	Comments
<ul style="list-style-type: none"> - One or more coordinators responsible for elements of the plan 	<p>Rochelle Leyva, Safety/ Worker’s Comp.; Jennie Watkins, HR</p>
<ul style="list-style-type: none"> - Coordinator contact Information shared with all workers 	<p>Yes; Jennie Watkins and Rochelle Levya are easily accessible to all workers in the plant.</p>
<ul style="list-style-type: none"> - State and local public health partners identified and actively involved 	<p>Yes, Texas County Health Department, Oklahoma State Department of Health (OSDH), and Seward County (KS) Health Department.</p>
<ul style="list-style-type: none"> - Periodic worksite assessments identified (note frequency of assessments) 	<p>Management, specifically the coordinators and plant manager/senior plant personnel, are assessing the plant each day. UFCW Local 2 conducted an inspection on/around 1 May 2020. Seaboard is beginning a “Captains” program, which will involve the enlistment and education of a number of plant personnel, which will then meet and assess potential for improvement monthly.</p>
<ul style="list-style-type: none"> - Covers all persons at facility (e.g., visitors, contractors, workers) 	<p>Both contracting companies (3rd party sanitation and cafeteria service) are incorporated into screening and isolation/quarantine policies. USDA FSIS staff that work at the plant are also covered by these policies.</p>
<ul style="list-style-type: none"> - Role of testing considered 	<p>On site, mass voluntary testing was already conducted before arrival of the team. Screening with immediate referral for testing remains available on site.</p>
<ul style="list-style-type: none"> - Role of workplace contact tracing considered 	<p>Once staff are aware of a worker who tests positive for COVID-19, they then identify any other Seaboard personnel who live with or commute with that person through both questioning and existing records. These Seaboard close contacts were excluded from work at the time of our visit. However, the Seaboard coordinators have expressed interest in modifying their asymptomatic, close contact policy to that outlined by CDC’s Critical Infrastructure Guidance, which would allow for continuation of work under specific circumstances.</p>
<p>System in place to monitor trends in absenteeism</p>	<p>Yes</p>
<p>Plan established to continue essential business functions in case of higher than normal absenteeism</p>	<p>Yes, ability to shift workflow, focus on higher market value products, or potentially slow the rate of production (to a degree). The plant has also begun working on more Saturdays. This has allowed 60-70% production to continue.</p>
<p>Plan includes all necessary controls implemented at the facility – per checklist below</p>	<p>A single, formal written plan document is currently being drafted at Seaboard. Recommendation: We recommend including the above information on COVID-19</p>

	<p>coordinator, contact information, testing, contact tracing, and addressing absenteeism in the written plan. The plan should include contact investigation for each COVID-19 case by identifying close contacts while the worker had symptoms and 2 days prior as defined by CDC Interim Guidance for Implementing Safe Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19.</p>
Collect feedback for improving the plan from workers and managers	Recommendation: We recommend including a mechanism for collecting information from workers and managers to improve the COVID-19 plan.

Controls

The following checklist summarizes the best practice controls described in the CDC/OSHA guidance. The controls and activities described below are the components of the overall plan noted above. Not every row would necessarily need to be checked “Yes” to have an effective program and an effective set of controls in place at a given facility. Judgment and consultation are necessary between the worksites and a qualified occupational safety and health professional (assisted as needed by CDC/NIOSH project officer(s) and state and local public health entities) to determine that the activities and controls in place at the facility meet the intent of the CDC/OSHA guidance as appropriate for that worksite.

ACTIVITIES ORGANIZED BY GOALS	Y	N	Partial or Alternative	COMMENTS
Ability to Maintain Social Distancing			Alternative/partial	The production line has areas where social distancing is not possible. In all those areas, barriers have been implemented, if feasible. All workers are wearing face shields as personal protective equipment (PPE) and source control.
Physical distancing is in place where possible			Partial	See below
- Work environment configured for spacing at least 6 ft apart			Partial	Areas such as the loin line, Gam table, evisceration, and rib packing do not have room for spacing. Barrier partitions are in place or planned for all areas where feasible, such as the ham line and tongue processing.
- Alignment of workstations allow for at least 6 ft spacing			Partial	Areas such as the loin line, Gam table, evisceration, and rib packing do not have room for appropriate spacing. Barrier partitions are in place or planned for all areas where feasible, such as the ham line and tongue processing.
- Workers not facing each other when possible	Y			Aligns with CDC/OSHA guidance

<p>- Table and chair spacing in break rooms is at least 6 ft apart</p>			<p>Partial</p>	<p>Partitions are in place at tables and adequate additional tentage has been added to facilitate distancing. However, workers are not yet utilizing the additional space enough to spread out.</p> <p>The long, bar-like table along the walls of the cafeteria have polycarbonate/plexiglass barriers. They do not extend beyond the table edges enough to act as a barrier between adjacent personnel who are sitting in a neutral position. Also, directly behind those seats is where workers wait in line for food. When those workers at the bar-like table remove their masks to eat, they are in close proximity to an entire line of workers waiting in line. Recommendation: We recommend discontinuing use of this bar seating to promote appropriate social distancing.</p> <p>The tables with benches in the cafeteria have barriers that do not sufficiently extend beyond the table edge to provide protection between workers on the same bench. This leads to scenarios with two workers within two feet of each other and neither wearing masks. Recommendation: We recommend establishing a system that promotes diagonal seating of workers to facilitate social distancing. Additionally, to help promote this, consider using physical barriers that cannot be easily removed on portions of the benches where employees should not sit.</p> <p>Workers may accidentally touch unwrapped forks and spoons when picking up management-provided utensils for use. Recommendation: provide utensils wrapped in plastic or another dispensing option where workers only touch utensils that they are going to use.</p>
<p>- Alternative break areas identified (e.g., training and conference rooms, outside tents)</p>	<p>Y</p>			<p>Tentage with restrooms and handwashing stations is available as additional break or lunch area. Also, a former training room has been converted to a lunch area, complete with microwaves.</p>

			<p>Recommendation: Continue to offer break and lunch areas outdoors to reduce the density of workers in existing breakrooms and cafeterias and encourage workers to spend their breaks in locations with air movement and space for social distancing. Consider including the capability of providing heated or cooled air to encourage use of the outdoor space in inclement weather. Other facilities have implemented similar controls and are incentivizing outdoor breaks and lunches. Continue to include portable or temporary bathroom and handwashing facilities as a part of this setup.</p> <p>Recommendation: If fans such as pedestal fans or hard mounted fans are used in the facility, 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. If fans are removed, employers should remain aware of, and take steps to prevent, heat hazards.</p>
<ul style="list-style-type: none"> - Use of physical barriers, such as partitions, to separate workers in production areas, when 6 ft spacing is not possible 	Y		<p>Barriers have been implemented where possible, given the constraints of work.</p> <p>Recommendation: Continue assessing the workplace periodically and adding barriers between additional workstations to minimize close contact among workers where possible. The barriers could be made of plexiglass, stainless steel, or durable polycarbonate. Barriers should be used in combination with (and not replace) other social distancing, hand hygiene, and PPE efforts outlined in these recommendations, wherever feasible given the task being conducted in that area. Determine if barriers could pose a safety hazard for workers. Ensure it would not be possible for workers' tools, hands, or arms to be caught between the barrier and moving parts of the conveyor. This may require pilot testing barriers before implementing them in all workstations where workers cannot be separated by 6 feet or more. Consult with USDA to determine if proposed controls are</p>

			acceptable with regards to food safety and sanitation.
- Partitions present in break areas (e.g., lunch areas, break rooms, prayer rooms)		Partial	The partitions between table stations do not extend beyond the table edge due to concerns over being broken. Consequently, they provide an insufficient barrier between individuals. Recommendation: Consider prohibiting the use of every other station by removal or barricading seats. Consider installing barriers on the ends of the tables to create a physical divide between workers.
- Workers are able to maintain distance from others (at least 6 feet) when clocking in or out	Y		Aligns with CDC/OSHA guidance
- Workers are able to maintain distance from others (at least 6 feet) when in locker rooms, changing areas, break areas, smoking areas, and rest rooms	Y		Recommendation: Continue to educate and remind workers that locker rooms are not safe zones to remove masks when others are present. Encourage the use of cloth face coverings or disposable facemasks at all times in the plant, with the exception of when they are eating or drinking.
- Workers designated to monitor and facilitate distancing on processing floor lines		Partial	Screeners at the temperature screening area are providing reminders to maintain social distancing. Recommendation: Consider employing social distancing champions to reinforce proper social distancing and cloth face covering and disposable facemask use in parking lots, throughout screening, in hallways, locker rooms, cafeteria and break areas, and any other spaces in the plant where workers congregate. This is especially important in areas like the locker rooms where social distancing is more difficult given the physical space.
- Visual cues (floor markings, signs in appropriate languages) used throughout plant to promote social distancing		Partial	Many signs were observed. Recommendation: Continue to provide COVID-19 informational signage throughout the plant. Add additional signage in cafeterias, locker rooms, break areas, and other areas where workers might congregate to remind workers about hand hygiene, social distancing, and cloth face covering and disposable facemask use. Recommendation: Enlarge and simplify COVID-19 signage. Use more pictures/pictograms and add more languages to increase the percentage of the workforce

			that engages with signs and messaging. Ensure signage is at eye level and can be easily seen by the workers. Develop or provide existing training and messaging (in multiple languages) for social distancing, hand hygiene, PPE and cloth face covering donning and doffing, cough and sneeze etiquette (even when wearing cloth face covering and disposable facemask), and sanitizing PPE and source controls, and messaging about what to do when sick. If workers carpool, consider training in multiple languages on the risks related to carpooling and how to mitigate them.
Shifts have been adjusted to promote distancing	Y		Recommendation: Continue staggering shifts and start times as much as feasible to decrease number of workers in locker rooms, break areas, and cafeterias at one time. If feasible, strictly prescribe the time that the next shift is allowed to come into the plant so that these workers are not congregating in the locker rooms and cafeteria for long periods of time before their shifts start.
Arrival and departure times staggered	Y		Recommendation: Install additional touchless clock in/out stations to reduce crowding and congregating at these areas.
Break times and/or meals staggered	Y		Recommendation: Consider staggering breaks further so fewer workers are on break at the same time.
Encourage workers to avoid carpooling if possible, or provide guidelines for controls that can be used during carpooling (e.g., limiting the number of persons per vehicle as much as possible, use of cloth face coverings, cleaning and disinfecting commonly touched surfaces after each trip)		Partial	Recommendation: If they must carpool, consider training in multiple languages on the risks related to carpooling and how to mitigate them. Using pictures/pictograms and visual demonstrations will increase the percentage of the workforce that engages with signs and messaging. Recommendation: For H2-B workers that utilize employer operated vans to get to work, consider screening workers (questions about symptoms and temperature monitoring) prior to entry onto the van. Continue to clean high touch surfaces after each trip and limit the number of passengers on each van to better allow social distancing. To accommodate this lower capacity, more trips might need to be provided.

Promote Hand Hygiene				
Hand sanitizer stations with at least 60% alcohol available in multiple locations (preferably touch-free) or handwashing stations; promote frequent and thorough handwashing	Y			Recommendation: Ensure that all break and eating areas have hand washing or sanitization stations inside and at the entrance.
Touch-free clock in/out stations (if possible)	Y			Swiping is minimal contact.
If carpooling cannot be avoided <ul style="list-style-type: none"> - Encourage workers to use hand hygiene before entering vehicle and at destination - Encourage use of cloth face coverings while in vehicle 			Partial	<p>Recommendation: Provide education and training to workers to help increase knowledge of how COVID-19 is spread. Text messaging systems and other commercial solutions that have language adaptability may facilitate communication with workers.</p> <p>The bilingual television (audio and visual) advisories are helpful, but only if workers take the time to observe them.</p> <p>Recommendation: Consider providing education materials in languages other than English and Spanish because a significant portion of workers have other primary or preferred languages.</p> <p>Recommendation: On company owned vans, encourage workers to perform hand hygiene before entering the vehicle and when arriving at the destination. Consider having hand sanitizer available as workers enter the vehicle.</p>
- Encourage workers to use cough/sneeze etiquette in vehicles			Partial	Same as above
Provide education on hand hygiene and cough/sneeze etiquette <ul style="list-style-type: none"> - Training 				Same as above
Has the number of breaks been increased to allow for additional opportunities to practice hand hygiene?		N		Recommendations: Consider arranging work so only a portion of the “Cuts” or “Harvest” section go to the locker room or break room at a given time to reduce crowding and promote social distancing.
Identify and Exclude Ill Workers from Working				
Does the facility have procedures in place for workers to report illness before arrival?	Y			On the back of the worker ID cards is a telephone number to call to report illness.
Is a screening strategy for all persons entering facility in place?			Partial	Partial because screeners are not currently asking about symptoms. Recommendations:

				In addition to measuring temperature, establish a verbal screening protocol that is in appropriate language(s) to determine whether workers have had a fever, felt feverish, or had chills, coughing, or difficulty breathing in the past 24 hours prior to entry. Including large pictograms in the screening process can increase effectiveness of non-verbal communication if language or literacy challenges exist.
- Temperature less than 100.4° F (38.0°C)	Y			Aligns with CDC/OSHA guidance
- Symptoms (cough, shortness of breath)		N		<p>Recommendation: Consider screening workers for COVID-19 symptoms such as fever, felt feverish, or had chills, coughing, or difficulty breathing in the past 24 hours prior to entry because some COVID-19 infections may not include fever due to mild symptoms or use of fever-reducing medications. Screening could be done with simple pictographs symbolizing symptoms and someone pointing at each one, getting an affirmative or negative from each person. Communication 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; and (2) be at the appropriate literacy level. Doing this prior to entry prevents the person from interacting with others in the locker room and potentially infecting coworkers.</p> <p>Follow the CDC Interim Guidance for Implementing Safe Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19.</p>
Plan for workers identified as having fever or symptoms includes:	Y			Aligns with CDC/OSHA guidance
- Encouraging self-isolation and contacting a healthcare provider				
- Providing information on return-to-work policies	Y			Aligns with CDC/OSHA guidance
- Informing human resources, worker health unit (if available), and	Y			Aligns with CDC/OSHA guidance

supervisor while maintaining worker confidentiality				
Health and safety considerations for screeners <ul style="list-style-type: none"> - Engineering controls (e.g. barriers) to promote distancing are in place 			Alternative	Temperature monitoring is automated using a thermal imaging system. Recommendation: Ensure that personnel performing screening activities, including temperature checks, are appropriately protected from exposure to potentially infectious workers entering the facility. Implement engineering controls, such as physical barriers or dividers or rope and stanchion systems, to maintain at least six feet of distance between screeners and workers being screened. If screeners need to be within six feet of workers, provide them with appropriate PPE because they have repeated close contact with other workers.
<ul style="list-style-type: none"> - Screeners that need to be within 6 feet of workers have appropriate personal protective equipment (PPE), which may include gloves, gown, face shield, and facemask or respirator 	Y			Aligns with CDC/OSHA guidance
Plan in place for workers who become ill at work that includes <ul style="list-style-type: none"> - Alerting management when a worker is experiencing symptoms including fever 	Y			Aligns with CDC/OSHA guidance
<ul style="list-style-type: none"> - Identifying close contacts at work for 48 hours before symptoms began 			Partial	Coworkers are considered close contacts by the company if they live with or carpool with the case. Contact at work is not considered close contact by the company. Recommendation: Contact investigation for each COVID-19 case should follow the CDC Interim Guidance for Implementing Safe Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 and the CDC Contact Tracing : Part of a Multipronged Approach to Fight the COVID-19 Pandemic .
<ul style="list-style-type: none"> - Separating ill worker from others and send home 	Y			Aligns with CDC/OSHA guidance

- Disinfecting the workstation, tools, and locker area of the ill worker		N		Recommendation: If a worker reports being sick, disinfect the workstation used and any tools handled by the symptomatic worker.
- Protections are in place for personnel managing ill workers (distancing, appropriate PPE)	Y			Aligns with CDC/OSHA guidance
Sick leave policies and incentive programs ensure that ill workers are not in the workplace. Examples include no bonuses based on attendance and encouraging workers with symptoms or ill household members to stay home without fear of punishment.	Y			<p>If a worker becomes positive for COVID-19, that worker is eligible for 80 hours of paid leave and the access card is inactivated until the worker is no longer required to self-isolate, according to OSDH guidance (which is currently the same as CDC Guidance). If the worker remains ill beyond that time period, they may use time-off with no penalty.</p> <p>There is one policy that offers a \$100 bonus to workers who do not require alternative work schedules, but COVID-19 illness is explicitly not a reason for forfeiture. This policy expired on May 16, 2020. Workers have been given a temporary \$2 per hour raise, a practice that is set to expire on June 14, 2020.</p>
- Policies are being communicated to workers	Y			Recommendation: Any changes in policies or educational messaging should be updated through all available channels. Consider engaging supervisors, union leadership, workers, and strategic community partners as appropriate.
<p>Return-to-work policy for asymptomatic, exposed workers is:</p> <ul style="list-style-type: none"> - Consistent with CDC Critical Infrastructure Guidance; workers can continue to work with additional safety precautions provided they remain asymptomatic 		N		<p>At the time of our visit, their policies regarding asymptomatic workers with potential exposure to COVID-19 were not consistent with CDC’s Critical Infrastructure Guidance. The facility was using a narrower definition of close contact and did not allow asymptomatic close contacts to work. However, sick workers were being excluded from working, which is consistent with CDC guidance. They have plans to modify their policies regarding the definition of close contacts to reflect CDC’s Critical Infrastructure guidance and allow close contacts to work if they remain asymptomatic.</p> <p>Recommendation: Consider establishing a system to monitor these workers for 14 days</p>

			<p>after their last exposure and ensure additional precautions are being taken per the CDC Interim Guidance for Implementing Safe Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19.</p> <p>Critical Infrastructure workers who have had an exposure but remain asymptomatic should adhere to the following practices prior to and during their work shift:</p> <ul style="list-style-type: none"> • Pre-Screen: Employers should measure the employee’s temperature and assess symptoms prior to them starting work. Ideally, temperature checks should happen before the individual enters the facility. • Regular Monitoring: As long as the employee doesn’t have a temperature or symptoms, they should self-monitor under the supervision of their employer’s occupational health program. • Wear a Mask: The employee should wear a face mask at all times while in the workplace for 14 days after last exposure. Employers can issue facemasks or can approve employees’ supplied cloth face coverings in the event of shortages. • Social Distance: The employee should maintain 6 feet and practice social distancing as work duties permit in the workplace. • Disinfect and Clean work spaces: Clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment routinely.
<p>- Developed in consultation with state and local health departments</p>	<p>Y</p>		<p>Aligns with CDC/OSHA guidance</p>

Return-to-work policy for workers with COVID-19 is: <ul style="list-style-type: none"> - Consistent with CDC interim guidance for ending home isolation 	Y			Aligns with CDC/OSHA guidance
<ul style="list-style-type: none"> - Developed in consultation with state and local health departments 	Y			Aligns with CDC/OSHA guidance
A plan exists to inform those in contact with ill workers of possible exposure and the plan <ul style="list-style-type: none"> - Maintains confidentiality as required by the Americans with Disability Act 	Y			Aligns with CDC/OSHA guidance
<ul style="list-style-type: none"> - Includes working with state and local health department to identify close contacts of ill workers 	Y			Aligns with CDC/OSHA guidance
The facility has considered cohorting workers. Examples include: <ul style="list-style-type: none"> - Always assigning groups of workers to same shift with same coworkers - Use of lunchrooms by individual departments or in shifts with cleaning in between; making sure there is time in between shifts to allow for cleaning or minimized contact 		N		Recommendation: Consider cohorting (grouping workers together). This can increase the effectiveness of altering the plant’s normal shift schedules by making sure that groups of workers are always assigned to the same shifts with the same coworkers. Cohorting may reduce the spread of workplace SARS-CoV-2 transmission by minimizing the number of different individuals who come into close contact with each other over the course of a week. Cohorting may also reduce the number of workers quarantined because of exposure to the virus.
On-site occupational healthcare personnel are following CDC and OSHA guidance for healthcare and emergency response personnel as applicable	Y			Aligns with CDC/OSHA guidance
Provide Education, Training, and Communication				
Education, training, and communication are provided in languages and literacy levels appropriate to workforce			Partial	Recommendation: Continue to use other resources to reach Amharic, Tigrinya, Karen (ethnicity from Myanmar), and Quiche dialects. These can be translation services, other individuals who use the same language, closed-circuit television ads, and strategic community partners. 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.
A worker education program is in place to prevent spread of COVID-19 and to identify symptoms. Topics covered include:			Partial	Recommendation: Continue to seek methods to teach these topics: -signs and symptoms of COVID-19, -risks for workplace exposure, -avoiding touching mouth, nose, and eyes, and -hand hygiene and sanitizing. With a large work force, it is not possible to teach all at once, but smaller groups can be taught each day. Utilize interpreter services as necessary. As these groups are educated, they could prove a source of further education for their peers.
- Signs and symptoms of COVID-19			Partial	
- Risks for workplace exposures			Partial	
- Avoiding touching the mouth, nose, and eyes			Partial	
- Hand hygiene			Partial	Hand washing coaches will be posted in locker rooms.
Signage posted in the facility that encourage staying home when sick, cough and sneeze etiquette, proper hand hygiene practices, and social distancing.	Y			Signs were predominately in English and Spanish. Recommendation: Graphics and suggested messages are available from CDC for use on social media profiles and web pages. Print resources and communication guidance also are available from CDC in multiple languages. Videos are also available for use. Use definitions and examples to explain technical terminology and concepts used in training or communications to help improve understanding.
Cleaning/Sanitization/Disinfection				
One shift reserved for cleaning and sanitization following USDA guidelines and OSHA safety regulations to protect the cleaning team.	Y			Each night has a cleaning shift from 0000 to 0530. One night each weekend (Friday night, if not working Saturday, or Saturday night, if Saturdays are worked) has a shift starting at 0000 with extended cleaning to 1200 the same day.
Cleaning and disinfection of commonly touched surfaces after each carpool trip (e.g., door handles, handrails, seatbelt buckles).			Partial	They have issued guidance to clean them in the past, but they will incorporate this guidance in written plans to ensure continuing compliance.

Cleaning and sanitization protocols are in place for tool-intensive operations and food contact surfaces	Y			Aligns with CDC/OSHA guidance
Disinfection protocols including increased frequency and supplies are in place for the following:	Y			Aligns with CDC/OSHA guidance
- common areas				
- frequently touched surfaces (e.g., faucets, microwave or refrigerator handles or vending machine touchpads)	Y			Aligns with CDC/OSHA guidance
- physical barriers (if present)	Y			
Proper disinfectants are in use (refer to EPA list N and USDA regulations for food production areas) with appropriate PPE	Y			Aligns with CDC/OSHA guidance
High-touch areas are disinfected frequently during each shift (note frequency) and appropriate time allowed in between each shift to accommodate cleaning.	Y			Aligns with CDC/OSHA guidance
Products are applied at the appropriate concentration for the appropriate contact time	Y			Aligns with CDC/OSHA guidance
Provide PPE, As Appropriate				
Employer has conducted a hazard assessment to determine PPE needs for routine operations, not limited to COVID-19	Y			The PPE exchange area is a congregation point and does not allow appropriate social distancing. Workers taking off dirty PPE are directly beside those receiving clean PPE. Recommendation: Consider modifying the PPE exchange area to reduce the density of staff there at one time and to increase social distancing. Consider removing the exchange portion entirely (since the used PPE is disposed of anyways) and have several PPE issuing stations to allow better social distancing.
- Appropriate PPE is in use based on hazard assessment	Y			Aligns with CDC/OSHA guidance
- Continuing the usual PPE program, including regular training and emphasis on disinfection and storage	Y			Aligns with CDC/OSHA guidance
- Stressing hand hygiene before and after handling PPE			Partial	Recommendation: Continue education on the importance of hand hygiene before and after handling all PPE and source control devices (e.g., facemasks, face shields).

Provide Cloth Face Coverings, As Appropriate				
Determination on facility policy for cloth face covering requirement/recommendation has been made	Y			From the moment of entry to the moment of departure. Additional facemasks are available upon departure.
- Employer is providing readily available clean cloth face coverings	Y			A new disposable facemask is provided each shift. Management provides clean cloth face coverings (or disposable facemasks) for workers to use when their covering become wet, soiled, or otherwise visibly contaminated.
- Policies ensure proper wearing, laundering, and disposal of cloth face coverings	Y			Aligns with CDC/OSHA guidance
Consider use of face shields - may help keep face covering and glasses clean - provide additional barrier protection - appropriate use and storage	Y			All workers are wearing face shields for PPE and source control. Fogging of face shields, especially in production areas is a concern. Recommendation: Consider providing commercial defogging solutions and making these solutions available throughout the plant, including in production areas.
Employer has considered allowing voluntary use of filtering facepiece respirators (such as an N95, if available)	Y			Availability is limited, company does not have fit testing, but N95s are being deliberated. Recommendation: If the company decides to provide N95 filtering facepiece respirators, they should determine whether N95 respirators will be required or voluntary and follow the applicable OSHA regulation under 29 CFR 1910.134 .
Evaluate and Maintain Ventilation				
Employer has considered consulting with a heating, ventilation/air-conditioning engineer to ensure adequate ventilation (if applicable)	Y			Recommendation: Consider providing air conditioners in tents and add-on break areas when outdoor temperatures increase. If fans such as pedestal fans or hard mounted fans are used, 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. Employer should remain aware of, and take steps to prevent, heat hazards .

Fans are arranged to minimize blowing air from worker to worker (if applicable)			Partial	<p>Portacools / power blowers have been purchased by the company but are not yet in use.</p> <p>Recommendation: 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.</p>
Personal cooling fans have been removed, if applicable	Y			Aligns with CDC/OSHA guidance
Employer has taken steps to prevent heat hazards if fans are removed	Y			<p>Air conditioning or other heat stress controls might be needed in harvest work areas, break tents, or rigid-framed break areas.</p> <p>Recommendation: Consider air conditioning or other cool air options in the harvest work areas, break tents, and rigid-framed break areas to reduce potential for heat hazards. Employers should remain aware of, and take steps to prevent, heat hazards. 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.</p>
Employer is ensuring proper maintenance and sterilization (e.g., ultraviolet, if available) of the filters in the ventilation system	Y			No ultraviolet sterilization, but management reported that standard recommended maintenance for the heating, ventilation, and air-conditioning system is performed.