Department of Labor and Economic Opportunity
Return to work guidelines for manufacturing

PRELIMINARY AND PRE-DECISIONAL | MAY 7TH, 2020
Eight steps for employers to keep their workers safe, within the hierarchy of controls

1. Administrative controls
2. Access control
3. Distancing
4. Sanitation
5. Hygiene
6. PPE
7. Positive case protocols
8. Facility closure
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

• 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
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
Establish team or roles

Example: Large/medium plan

Example: Small factory/job shop plan

Administrator controls: example

Administrative controls

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
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

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

Screen employee health/exposure (home, entrance)

<i>Daily Self-Screening</i>

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 voluntarily monitor your health and report any symptoms before coming to work.

Survey to be completed daily by all employees before coming to work:

1. Have you had physical exposure to a person suffering from Coronavirus symptoms, as listed below:
   - Contact with COVID-19 in the past 14 days
   - Living or close contact with someone who has had contact with COVID-19 in the past 14 days
   - Travel to an area with known outbreaks of COVID-19

2. If you have been exposed to a person suffering from Coronavirus symptoms, as listed below:
   - High fever or chills
   - Cough
   - Shortness of breath or difficulty breathing
   - Loss of taste or smell
   - Fatigue
   - Muscle or body aches
   - Headache
   - Congestion or runny nose
   - Sore throat
   - Nausea or vomiting

If you answer yes to any of these questions, you must stay home and call your supervisor. If you believe you have coronavirus, please contact your healthcare provider immediately. If you are cleared to return to work, your supervisor will approve you to return to work.

Screen employee health/exposure (home, entrance)
Screen all visitors with similar protocol

Example signage

Access control example

2 Access control

Illustrative
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).
3 Social distancing

Increase general distancing between people

Limit common space use and operations

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

Social Distancing During Lunch Break

Manage lunch breaks to provide social spacing and proper hygiene. Stagger start and end times to limit the amount of people within the lunch area at a given time.

Recommended

For plants with less than 200 on a shift example:

Separate the plant into two groups

- Alternating days or weeks - Group A will be asked to go to the cafeteria for lunch, allow 5-10 extra minutes for loaded time to insert employees to go to their vehicle of reasonable and practical.
- Group B will be able to use the lunch room/entry to a certain number and all others will go to the vehicle. In effect employees can choose which option they prefer.

1st Break Example

- Row 1 Teams 1
- Row 2 Teams 2
- Row 3 Teams 3

*per plants with over 2

Plants with full set

- Do not allow a
- Place a permanent
**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).
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 HEPA filters, and increasing percentage of outside air in HVAC system.
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

5 Sanitation

Common Space Cleaning by Housekeeping
- Elevator/Tall Points
- Bathrooms
- 3rd Aisle
- Doors, handrails, drinking fountains, etc.
- Restrooms
- Cafeterias, break areas, vending
- Kitchen, break areas, vending
- Restrooms

Illustrative

Conduct frequent cleaning of all high touch areas and post protocols publicly
Establish employee cleaning protocols
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
Establish standard PPE requirements and distribution methods

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<th>Personal Protective Equipment (PPE) Required</th>
<th>Ensure PPE and safety supplies (masks, hand sanitizer) are stocked</th>
<th>Provide guidance for PPE usage and reasoning</th>
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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
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

Define protocol for symptomatic employees

Mark off and clean spaces identified in tracing

If there is a case of COVID-19 on the job site, it is essential to Stay Calm and follow the steps outlined below:

- Do the subcontractors have an office space and/or break area?
- How many other subcontractors performed work in the area occupied by the positive employee?
- 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:
- 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.
- Common areas, including meeting rooms, shared equipment (e.g. copiers/printers), restrooms, kitchenette, should be evaluated.
- Maintain social distancing during evacuation procedure.
- Restrict access to the identified affected areas.
- Smaller areas or rooms: cordon off for cleaning and disinfecting. See cleaning guidelines below.
- Larger areas: cordon off/isolate the area the person occupied and any high-touch surfaces the person may have come into contact with (and anything within 6 feet of those items)
- 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.
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)