DAIRY FOOD SAFETY ALLIANCE

WISCONSIN CHEESE MAKERS ASSOCIATION EST. 1891

CDR UW

DAIRY FARMERS OF WISCONSIN

SOP Template Addressing COVID-19 Positive Worker Return to Work

(Issued 04-29-2020)

1.0 Scope

1.1 This procedure details the steps that should be taken by a processor as part of their return to work program.

1.2 This procedure is applicable for both symptomatic and asymptomatic employees.

1.3 This procedure addresses two separate scenarios:

1.3.1 **Scenario 1**: an employee returning to work after recovery from the illness.

1.3.2 **Scenario 2**: multiple employees returning to work after a plant shut down and deep clean of the facility.

2.0 Responsible Parties

2.1 Responsibility for the implementation, execution and success of this program is cross functional:

Internal Partners

- Human Resources
- Production / Manufacturing
- Food Safety/ Quality Assurance
- Crisis Response Team

External Partners

- Local Health Department
- Wisconsin Department of Agriculture, Trade and Consumer Protection or your state department of agriculture
- Department of Health Services
- Centers for Disease Control and Prevention

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3.0 *Equipment/Supplies/Materials*

3.1 Equipment, supplies and materials needed to ensure the safety of personnel in the plant. This list will vary from plant to plant depending on plant specific policies and local health department ordinances.

3.2 Non-contact Thermometers

3.3 Face Masks

3.4 Face Shields

4.0 *Safety*

4.1 Appropriate controls should be put into place in order to reduce the risk of transmission from person to person and from person to different surfaces in the plant. These controls include:

4.1.1 Engineering Controls

4.1.1.1 Controls that involve isolating employees from work-related hazards.

4.1.1.1.1 Installing high efficiency filters throughout the facility.

4.1.1.1.2 Increasing ventilation rates within the working environment in compliance good manufacturing practices.

4.1.1.1.3 Installing physical barriers such as clear, plastic sneeze guards

4.1.2 Administrative Controls

4.1.2.1 Controls that require action from employers or employees

4.1.2.1.1 Encourage digital meetings in place of face to face meetings.

4.1.2.1.2 Adjust shift schedules to accommodate lower capacity in the facility.

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4.1.2.1.3   Develop emergency communication plans to address any worker concerns.

4.1.2.1.4   Ensure training is in place for all new policies and procedures.

4.1.3   Safe Work Practices

4.1.3.1   A specific type of administrative control includes procedures for safe and proper work   used to reduce the duration, frequency, or intensity of exposure to a hazard.

4.1.3.1.1   Develop a culture of personal hygiene.

4.1.3.1.2   Training and reinforcement of best practices tied to personal hygiene.

4.1.4   Personal Protective Equipment (PPE)

4.1.4.1   Controls that further mitigate risk but have not been shown to be as effective as other intervention strategies.

4.1.4.1.1   Selection of PPE should be based upon the hazard to the worker

4.1.4.1.2   PPE should be properly fitted to ensure optimal mitigation of risk

4.1.4.1.3   PPE should be refitted at a frequency in-line with manufacturer   recommendations.

4.1.4.1.4   PPE should be inspected, maintained, and replaced in accordance with cGMPs   and manufacturer recommendations.

4.1.5   All controls put into place at a facility shall include standard operating procedures, forms and training documents to ensure their effectiveness in risk mitigation. Failure to provide operating procedures and training will result in suboptimal risk mitigation.

4.2   Follow current plant safety policy and good manufacturing practices in accordance with federal, state and corporate policies as outlined in **Good Manufacturing Practices – SOP XXXX**

4.3   Ensure appropriate person protective equipment (PPE) is included in this section as well **Personal Protective Equipment – SOP XXXX**

4.4   Review appropriate handwashing procedures **Handwashing Policy & Procedure – SOP XXXX** and proper use and disposal of gloves, hair nets and beard nets **Glove Procedure – SOP XXXX, Hair Net & Beard Net SOP XXXX**

    4.4.1   Ensure that handwashing procedure signage is included near all handwashing station, bathrooms and kitchen areas within the facility.

4.5   Ensure that all visitors, contract workers, temporary workers, and routine delivery personnel adhere to corporate plant visitation policies **Visitor Policy – SOP XXXX, Contract Worker Policy & Procedures – SOP XXXX, Contract Worker Policy & Procedures – SOP XXXX, Plant Delivery Policy & Procedures – SOP XXXX**

4.6   Ensure that all soap dispensers and hand sanitizer dispensers and full, clean, and in proper working order in accordance with corporate policies. Provide refresher training in this area as needed **Handwashing Policy & Procedures – SOP XXXX, Handwashing Training Form, Soap and Sanitizer Procedures – SOPs XXXX**

4.7   Ensure procedures are in place to practice social distancing (at least 6 feet away from the next closest individual) in accordance with CDC and Wisconsin Department of Health Services guidance documents.

4.8   Ensure that a calibration program is in place for all thermometers that are in use throughout the facility including those that are used to monitor employee temperatures **Thermometer Calibration Procedure, Thermometer Calibration Form – SOPs XXXX**

4.9   Ensure that a sanitation program is in place for all thermometers that are in use throughout the facility including those that are used to monitor employee temperatures **Thermometer Sanitation Procedure, Thermometer Sanitation Form – SOPs XXXX**

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4.10 Ensure that procedures are in place to address proper usage and maintenance of face masks while working in the facility **Proper Fit Procedure for Face Masks, Proper Use of Face Masks, Cleaning of Face Masks, Proper Disposal of Face Masks – SOPs XXXX**

4.11 Ensure that a procedure is in place for addressing a COVID-10 positive employee **SOP Template Addressing COVID-19 Positive Worker**

5.0 Procedure

5.1 Symptomatic employees should remain at home and should not return to work until they have recovered from the illness.

5.2 Recovered employee (confirmed positive COVID-19 OR unconfirmed) that has been outside of the facility (either office or food processing area) between 2-14 days, is asymptomatic, and has a signed, written return to work document from a medical provider.

5.2.1 The employee should be allowed to return to the facility and should continue to self-monitor for symptoms.

5.2.2 Emphasize proper hygiene practices and re-train the employee as necessary.

5.3.3 There is no need for the employee to wear a face mask while working in the facility. If they choose to wear a mask, cloth masks are acceptable as long as they comply with current cGMPs.

5.3 Recovered employee (confirmed positive COVID-19 OR unconfirmed) that has been outside of the facility (either office or food processing area) between 2-14 days, is asymptomatic, and does not have a signed, written return to work document from a medical provider.

5.3.1 The employee should be allowed to return to the facility and should continue to self-monitor for symptoms.

5.3.2   Emphasize proper hygiene practices and re-train the employee as necessary.

5.3.3   The employer may wish to take them the employees' temperature in accordance with company policy and current Centers for Disease Controls and Prevention guidance. Any employee with a fever (>100.4 °F) should not enter the facility.

5.3.4   There is no need for the employee to wear a face mask while working in the facility. If they choose to wear a mask, cloth masks are acceptable as long as they comply with current cGMPs.

5.4   Return of employees after a multi-day shutdown and deep clean of the facility due to multiple confirmed positive COVID-19 cases.

    5.4.1   Employee Practices

       5.4.1.1   Only asymptomatic employees should return to work. Any employee with a fever (>100.4 °F) and/or is exhibiting respiratory symptoms such as cough and shortness of breath should not be allowed to enter the facility.

       5.4.1.2   Employee temperatures may be taken at the discretion of the company. If the employer chooses to take temperatures, any employee with a fever (>100.4 °F) should not be allowed to enter the facility.

          5.4.1.2.1   Temperatures must be documented on a standard form and shall be reviewed daily by the appropriate personnel in charge.

       5.4.1.3   Employees may also be asked to answer the following questions about their overall health condition:

          5.4.1.3.1   Do you feel ill or are you experiencing cough of shortness of breath?

          5.4.1.3.2   Have you had a fever, cough or shortness of breath within the last week?

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5.4.1.3.3 Have you in contact with a confirmed positive COVID-19 individual within the last week?

5.4.1.4 Employees may be required to wear face masks in accordance with company policy. If an employer decides to implement a face mask policy, it is imperative that employees be properly trained on how to wear, maintain and clean face masks.

5.4.1.4.1 Single use masks, if available, should be used in accordance with manufacturer recommendations and should be in compliance with company cGMPs. In most cases, these should be supplied by the company and kept in a clean, sanitary environment while in storage.

5.4.1.4.2 Single use masks should be replaced once they become wet, damaged or at the end of each shift. DO NOT REUSE SINGLE USE MASKS.

5.4.1.4.3 Cloth masks, provided by the company, must be clean and in good condition. Company provided masks should be kept on-site and should follow guidelines similar to those developed for a captive shoe policy.

5.4.1.4.4 If possible, cloth masks provided by the facility should be laundered at the facility.

5.4.1.4.5 Cloth masks, provided by the employee, must be clean and in good condition. Employee masks can be taken home to be laundered.

5.4.1.4.6 Some companies may choose to use face shields or face shields in conjunction with face masks. Face shields should be used in accordance with manufacturer recommendations and should be in compliance with company cGMPs

5.4.1.4.6.1 Face shields used in conjunction with face masks must not inhibit the effectiveness of the face masks.

5.4.1.4.6.2   Face shields must be kept clean and must be in proper working order.

5.4.1.4.6.3   Face shields should be cleaned and sanitized at least once per shift or at the designated frequency provided by the manufacturer.

5.4.1.5   Employees that are considered high risk, meaning that they were in very close contact with employees where social distancing is not possible or those with underlying conditions, may wear a mask OR may need to be reallocated into another role for a period of time.

5.4.2   Contractor / Visitor Practices

5.4.2.1   Ensure that all visitors, contract workers, temporary workers, and routine delivery personnel adhere to corporate plant visitation policies

5.4.2.2   Only asymptomatic contractors/visitors should be admitted to the facility. Any contractor/visitor with a fever (>100.4 °F) and/or is exhibiting respiratory symptoms such as cough and shortness of breath should not be allowed to enter the facility.

5.4.2.3   Contractor/visitor temperatures may be taken at the discretion of the company. If the company chooses to take temperatures, any contractor/visitor with a fever (>100.4 °F) should not be allowed to enter the facility.

5.4.2.3.1   Temperatures must be documented on a standard form and shall be reviewed daily by the appropriate personnel in charge.

5.4.2.3   Contractors/visitors may also be asked to answer the following questions about their overall health condition:

5.4.1.3.1   Do you feel ill or are you experiencing cough of shortness of breath?

5.4.1.3.2 Have you had a fever, cough or shortness of breath within the last week?

5.4.1.3.3 Have you in contact with a confirmed positive COVID-19 individual within the last week?

5.4.1.4 Contractors/visitor may be required to wear face masks in accordance with company policy. It is highly recommended that the company have face masks available for contractors/visitors.

5.4.1.4.1 Single use masks, if available, should be used in accordance with manufacturer recommendations and should be in compliance with company cGMPs. In most cases, these should be supplied by the company and kept in a clean, sanitary environment while in storage.

5.4.1.4.2 Single use masks should be replaced once they become wet, damaged or at the end of each shift. DO NOT REUSE SINGLE USE MASKS.

5.4.1.4.3 Cloth masks should not be used by contractors/visitors in the facility. Only single use masks should be used.

5.4.3 Plant Start-Up Practices

5.4.3.1 Only employees that are asymptomatic, have donned appropriate PPE and have washed and sanitized their hands may be in the processing lines.

5.4.3.1.1 Department supervisors are responsible for ensuring that their employees meet the above requirements.

5.4.3.2 Ensure that appropriate social distancing guidelines are in place to ensure the safety of employees.

5.4.3.3 Ensure that all appropriate plant cleaning and sanitation has been completed and that paperwork is completed, signed and on-file.

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5.4.3.3.1   If any sanitation paperwork is missing or incomplete, do not start the processing line.

5.4.3.3.2   Initiate a root cause analysis to correct this issue up to, and including, full cleaning and sanitation of affected areas.

5.4.4   Enhanced Cleaning & Sanitation Practices

5.4.4.1   Continue to follow enhanced sanitation measure as a risk management tool to ensure the safety and health of all employees, visitors, and contractors.

5.4.4.2   Use cleaning and sanitation chemicals that are EPA-registered "disinfectant" products for COVID-19. Work with your chemical supplier to ensure that your cleaning and sanitation chemicals are approved for use through the EPA emerging viral pathogen program for use against SARS-CoV-2, the coronavirus that causes COVID-19.

5.4.4.3   Always check the product label guidelines to ensure that the disinfectant products are and recomended for use in food manufacturing facilities.

5.4.4.4   Initiate processing area cleaning and sanitation procedures in accordance with plant and corporate policies **Sanitation Policies & Procedures: Processing – SOPs XXXX**

5.4.4.4.1   Clean associated processing areas including door knobs, light switches, panel operator buttons, utensils, hoses, weight scales, indirect and direct product contact surfaces, writing utensils, etc.

5.4.4.4.2   Non-processing areas utilized by the afflicted employee should also be cleaned and sanitized. Initiate non-processing area cleaning and sanitation procedures in accordance with plant and corporate policies **Sanitation Policies & Procedures: Processing – SOPs XXXX**

5.4.4.4.3   Clean associated non-processing areas including key code panels, break rooms, locker rooms, bathrooms, doorknobs, light switches, desks, chairs, kitchens, writing utensils, etc.

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5.4.4.5   Be sure to verify the effectiveness of your sanitation practices and be sure to document all results in accordance with company policies.

6.0   *Forms*

6.1   **Name of Form SOP – XXXX**

7.0   *Definitions*

7.1   Include appropriate definitions included as a part of this specification

7.2   N/A

8.0   *References*

8.1   Regulatory guidance and regulations:

8.1.1   CDC Resources

8.1.1.1   https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html

8.1.1.2   https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html

8.1.2   FDA Resources

8.1.2.1   https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19

8.1.3   USDA Resources

8.1.3.1   https://www.usda.gov/coronavirus

8.1.4   EPA Resources

8.1.4.1   https://www.epa.gov/coronavirus

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8.1.4.2   https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

8.1.5.   Wisconsin Resources

8.1.5.1   https://www.dhs.wisconsin.gov/covid-19/index.htm

8.1.5.2   https://wisconsindairy.org/covid19

8.1.5.4   https://www.cdr.wisc.edu/about/coronavirus

8.1.5.5   https://www.wischeesemakersassn.org/covid-19-resources

8.1.5.6   https://www.wisconsin.edu/coronavirus/covid-19-resources/

8.1.5.7   https://datcp.wi.gov/Pages/News_Media/Covid19Dairy.aspx

8.1.5.8   https://wedc.org/programs-and-resources/covid-19-response/

8.1.5.9   https://www.wmep.org/covid-19-coronavirus-resources/

8.1.5.10   https://wfbf.com/covid-19-updates-resources/

8.1.6   Additional Resources

8.1.6.1   https://instituteforfoodsafety.cornell.edu/coronavirus-covid-19/food-industry-resources/

8.1.6.2   https://www.fmi.org/food-safety/coronavirus

8.2   Technical articles:

8.2.1   *Cleaning and Other Control and Validation Strategies to Prevent Allergen Cross-Contact in Food-Processing Operations*, Journal of Food Protection, Vol 71, No.2, 2008, Pages 445-458.

8.2.2   ETC

9.0   *Related Documents*

9.1   **Program or Document Name SOP – XXXX**