COVID-19 Best Practices Guide for Industry

As our nation and the world grapples with coronavirus (COVID-19), dairy food manufacturers and processors have been recognized as part of a critical infrastructure industry. Our focus is the production of safe, quality dairy products to consumers everywhere, and on the safety and well-being of our workforce.

Dairy food makers are recognized leaders in strict safety protocols, tracing back through decades of emphasis on daily sanitation and cleaning. The U.S. Food & Drug Administration has made it clear that all foods produced in the U.S. are safe, and there is no evidence of food or food packaging being associated with transmission of this virus.

To aid dairy manufacturers and processors as they develop additional plans for their operations, related to coronavirus, the members of the Dairy Food Safety Alliance – comprised of leaders of the Center for Dairy Research, Dairy Farmers of Wisconsin, and Wisconsin Cheese Makers Association – offer this guide to help you create your proactive and reactive plans.

Please note the following contents:

- Answers to Frequently Asked Questions
- SOP Template Addressing COVID-19 Worker
- Employer Guidance (Proactive and Reactive)
- Mental Health Hotline Printable Poster

Thanks go to the many partners and organizations which provided resources and input for this guide.

COVID-19 and Dairy: Employer Guidance

Proactive Plans

- It is recommended by the Centers for Disease Control and Protection and various state agencies that employees who are able to telework should do so immediately and throughout this public health emergency.
  - Note: If an employee with a disability needs the same reasonable accommodation at a telework site that he had at the workplace, the employer should provide that accommodation, absent undue hardship.
- Issue interim guidance to your employees, clearly communicating the following:
  - Their safety is your primary concern
  - Expectations regarding proper hygiene related to handwashing, coughing, sneezing, and if applicable, the use of personal protective equipment
  - Expectations regarding work attendance
    - Note: If they are experiencing flu-like symptoms or a fever (100.4° F or greater using an oral thermometer), they should stay home and alert work to their symptoms, so that proper disinfection practices and other actions can occur. Employees should know that, while staff may be notified of the occurrence of a suspected or confirmed COVID-19 case on-site, in keeping with federal law, their personal status will remain confidential.
  - Resources for COVID-19 screening
    - Note: Public health officials can help with screening for COVID-19; include the number and hours your local public health department is open.
- Consider suspending associated penalties for the use of leave, paid or unpaid, so long as pre-notification occurs. If you take this step, it is recommended that you apply the policy to all job types and post the timeframe in which this change in policy will be in effect.
- Consider pro-actively offering scheduling flexibility, given that many employees may experience a loss of child, elder, or other family care. If you take this step, it is recommended that you apply the policy to all job types and post the timeframe in which this change in policy will be in effect.
- Some employees will experience significant anxiety as a result of this crisis, and it's important to share with them what help is available. If you participate in an Employee Assistance Program, remind them of that resource. Help is also available via the Substance Abuse and Mental Health Services Administration. The SAMHSA Disaster Distress Helpline provides round-the-clock crisis counseling via 1-800-985-5990 or by texting TalkWithUs to 66746. The service is free, multilingual, and confidential.

Employer Rights ([per Equal Employment Opportunity Commission, or EEOC](#))

- Employers can send home an employee with COVID-19 or symptoms associated with it.
- Employers may ask employees who report feeling ill at work, or who call in sick, questions about their symptoms to determine if they have or may have COVID-19. Currently these symptoms include, for example, fever, chills, cough, shortness of breath, or sore throat.
- Because the CDC and state/local health authorities have acknowledged community spread of COVID-19 and issued attendant precautions as of March 2020, employers may measure employees' body temperature. As with all medical information, the fact that an employee had a fever or other symptoms would be subject to ADA confidentiality requirements. Employers should note that not all people with COVID-19 display a fever.
- Employers may follow the advice of the CDC and state/local public health authorities regarding information needed to permit an employee's return to the workplace after visiting a specified location, whether for business or personal reasons.
- Employers may ask an employee why he or she has been absent from work if the employer suspects it is for a medical reason. Employers are always entitled to know why an employee has not reported for work.
- Employers may require employees to practice infection control protocols such as regular hand washing, coughing and sneezing etiquette, proper tissue usage and disposal.
- Employers may require employees to wear personal protective equipment during a pandemic. However, where an employee with a disability needs a related reasonable accommodation under the ADA (e.g., non-latex gloves, or gowns designed for individuals who use wheelchairs), the employer should provide these, absent undue hardship.
- Employers may screen job applicants for symptoms of COVID-19 after making a conditional job offer, so long as it does so for all entering employees in the same type of job.
- Employers may delay the start date of employees who have COVID-19 or symptoms associated with it or rescind the job offer altogether.
- Employers may require employees with confirmed COVID-19 to submit to a full medical examination before returning to work, so long as that policy is held for all employees with the same diagnosis.

Employee Rights ([per EEOC](#))

- Employees with disabilities that put them at high risk for complications of COVID-19 may request telework as a reasonable accommodation to reduce their chances of infection during a pandemic. Note, if an employee voluntarily discloses that he or she has a specific medical condition or disability that puts him or her at increased risk of influenza complications, the employer must keep this information confidential.

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DAIRY FOOD SAFETY ALLIANCE

COVID-19 and Dairy: Frequently Asked Questions

Q: What is a coronavirus?

A: Coronaviruses are a large family of viruses that are common in both humans and animals.

Q: What is COVID-19?

A: [COVID-19 is a respiratory illness disease](#) that can spread from person to person, and is caused by the novel coronavirus Severe Acute Respiratory Syndrome (SARS-CoV-2).

Q: Can dairy cows become infected with COVID-19?

A: There is no evidence that domestic cows are contracting COVID-19 or spreading it through milk. There is a different type of coronavirus, [bovine coronavirus](#), that cattle are susceptible to, which is unrelated to COVID-19.

Q: Can COVID-19 be transmitted through dairy products?

A: Both the [Food and Drug Administration](#) (FDA) and [European Food Safety Authority](#) (EFSA) have stated that there is no current evidence that food is a source or transmission route for the virus. The current consensus in the medical community is that coronaviruses are spread from person-to-person through inhaled respiratory droplets due to coughing or sneezing. It can also be spread when someone touches and object with the virus on it and then touches their mouth, face or eyes.

Q: Can COVID-19 be transmitted through the food we produce? What about while handling or freezing food?

A: Currently, there is no evidence that suggests that COVID-19 is transmitted through food consumption, according to the [Centers for Disease Control and Prevention](#) (CDC), [FDA](#), and [EFSA](#). Experience with other coronaviruses suggests these viruses survive poorly on surfaces, and thus there is a very low risk of spread from food products or packaging that are shipped over a period of days or weeks. While freezing is unlikely to inactivate the virus, most ready-to-eat products, including ice cream, are made with pasteurized ingredients.

Q: Does pasteurization kill COVID-19?

A: Pasteurized milk and dairy products are safe. There is no evidence to suggest that food produced in the United States can transmit COVID-19. Additionally, the U.S. Food and Drug Administration has confirmed that heat treatment kills other coronaviruses, so pasteurization is expected to also inactivate this virus.

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SOP Template Addressing COVID-19 Positive Worker

1.0   Scope

1.1   This procedure details the steps that should be taken by the processor should an employee test positive for the organism that causes COVID-19.

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

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
- Centers for Disease Control and Protection

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.

4.0 Safety

4.1 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** *(Note your GMP SOP here)*

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

4.3 Review appropriate handwashing procedures **Handwashing Policy & Procedure – SOP XXXX** *(Note your Handwashing SOP here)* and proper use and disposal of gloves, hair nets and beard nets **Glove Procedure – SOP XXXX** *(Note your Glove SOP here),* **Hair Net & Beard Net SOP XXXX** *(Note your Hairnet SOP here)*

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

4.4 Ensure that all visitors, contract workers, temporary workers, and routine delivery personnel adhere to corporate plant visitation policies **Visitor Policy – SOP XXXX** *(Note your Visitor SOP here),* **Contract Worker Policy & Procedures – SOP XXXX** *(Note your Contract Worker SOP here),* **Plant Delivery Policy & Procedures – SOP XXXX** *(Note your Plant Delivery SOP here).*

4.5 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** *(Note your Handwashing SOP here),* **Handwashing Training Form, Soap and Sanitizer Procedures – SOPs XXXX** *(Note your Handwashing Training SOP here).*

5.0 Procedure

5.1 Symptomatic or asymptomatic employees outside of the facility, but have worked within the facility and/or within the food processing area within the past 7 days – positive COVID-19 test

    5.1.1 The employee should not return to the facility until they are approved to return by the local health department.

    5.1.2 Document all the employees that have been working closely with the afflicted employee within the past 7 days.

5.1.3 Continue to monitor those employees that have come into contact with the afflicted employee for 7 days for signs of illness. Notify local health department as appropriate.

5.1.4 Thoroughly clean and sanitize areas that the employee came in contact with during their time in the facility.

5.1.5 Continue to maintain communication with the afflicted employee to ensure their health and well-being while away from the facility.

5.2 Symptomatic or asymptomatic employees in the facility, but outside of food processing areas in the plant – positive COVID-19 test

5.2.1 Any symptomatic employee, meaning an employee that has a fever or is coughing, sneezing has trouble breathing, should not be allowed into food production areas.

5.2.2 The employee should be placed into quarantine; ideally in a low traffic location within the facility.

5.2.3 The local health department must be notified about the incident. Additional direction will be given by an employee of the local health department.

5.2.4 Document all the employees within a 6-foot radius of the afflicted employee.

5.2.5 Continue to monitor those employees that have come into contact with the afflicted employee for 7 days for signs of illness. Notify local health department as appropriate.

5.2.6 Upon approval from the local health department, escort the employee outside of the facility.

5.2.7 Thoroughly clean and sanitize areas that the employee came in contact with during their time in the facility.

5.2.8 Continue to maintain communication with the afflicted employee to ensure their health and well-being while away from the facility.

5.3 Symptomatic or asymptomatic employees in the facility and in food processing areas of the plant – positive COVID-19 test

5.3.1   Any symptomatic employee, meaning an employee that has a fever or is coughing, sneezing has trouble breathing, should not be allowed into food production areas.

5.3.2   Any asymptomatic employee, meaning an employee not showing typical symptoms associated with COVID-19 but afflicted with illness based upon test results, should be immediately removed from the processing area.

5.3.3   The employee should be placed into quarantine; ideally in a low traffic location within the facility and outside of the food processing area of the facility.

5.3.4   The local health department must be notified about the incident. Additional direction will be given by an employee of the local health department.

5.3.5   Immediately shut down the production line.

5.3.6   Communicate to employees on the line the they have been in contact with an employee that has been confirmed positive for the organism that causes COVID-19.

5.3.7   Document all the employees within a 6-foot radius of the afflicted employee.

5.3.8   Continue to monitor those employees that have come in contact with the afflicted employee for 7 days for signs of illness. Notify local health department as appropriate.

5.3.9   Upon approval from the local health department, escort the symptomatic employee outside of the facility.

5.3.10   Begin a deep clean and sanitation of the processing area in accordance with CDC, local health department and corporate policies.

    5.3.10.1   Ensure all employees wash their hands **Handwashing Procedure – SOP XXXX *(Note your Handwashing SOP here)*** and have proper personal protective equipment **Personal Protective Equipment Policy & Procedures – SOPs XXXX *(Note your PPE SOP here)***

    5.3.10.2   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.

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

5.3.10.4   Initiate processing area cleaning and sanitation procedures in accordance with plant and corporate policies **Sanitation Policies & Procedures: Processing – SOPs XXXX** *(Note your Sanitation SOP here)*

5.3.10.4.1 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.

5.3.10.5   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** *(Note your Sanitation SOP here)*

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

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

5.3.12   Continue to maintain contact with the afflicted employee to ensure their health and well-being while away from the facility.

6.0   *Forms*

6.1   **Name of Form SOP – XXXX**

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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 FDA Resources

8.1.2 CDC Resources

8.1.3 USDA Resources

8.1.4 ETC

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**

WORRIED ABOUT COVID-19?

You are not alone.

The Substance Abuse and Mental Health Services Administration Disaster Hotline can help. Call:

1-800-985-5990

or text:

TALKWITHUS TO 66746

The service is **free, multilingual, and confidential.**

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