



Feds Provide COVID-19 Guidance To Meat And Poultry Processing Employers

Insights

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Two federal agencies just released guidance for the meat and poultry packing industry to address the unique challenges it faces in light of COVID-19. The joint release from the Centers for Disease Controls and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA) recognizes that distinctive factors exist in meat and poultry processing workplaces that affect workers' risk for exposure to COVID-19, including their proximity to one another for extended periods of time.

COVID-19 Assessment And Control Plan

While there is no specific OSHA standard requiring an infectious disease response plan, the joint release suggests that meat and poultry processing employers should identify a workplace coordinator who is responsible for COVID-19 assessment and control planning. That individual should be the contact person for any employee COVID-19 concerns. Workplace coordinators should be encouraged to work with management to determine the necessity of employee testing and workplace contact tracing.

Engineering Controls

When possible, the joint release encourages you to rearrange workplaces to maximize the space between workers. This may require changes in production practices, including reducing the number of employees per line or installing physical barriers between employees. The joint release also suggests that you should consider consulting with ventilation engineers to provide adequate ventilation in work areas.

Citing OSHA's Sanitation Standard, the joint release indicates that you should place handwashing stations or hand sanitizers with at least 60% alcohol in multiple locations and encourage that employees practice good hand hygiene.

Administrative Controls

In order to promote social distancing, you are encouraged to stagger break times or create additional, temporary break areas. The joint release suggests staggering when employees arrive and leave the workplace to avoid congestion in parking areas, locker rooms, and near time clocks. The key is to take as many steps and precautions to encourage social distancing as possible.

You should also implement the CDC's recommended cleaning guidance. This includes cleaning and disinfecting commonly touched surfaces frequently. You should encourage employees to follow coughing and sneezing etiquette. While not mandated, the guidance suggests that you should promote personal hygiene by providing additional short breaks to allow employees to wash their hands more often and providing tissues and no-touch trash receptacles.

You should follow CDC [guidance](#) and allow employees to wear cloth face coverings as a protective measure. If you allow employees to wear cloth face coverings, you should instruct employees on the best practices for wearing cloth face coverings.

Educating Employees And Supervisors

The new guidance recommends implementing additional training that provides information about COVID-19, including the signs and symptoms of infection, and best practices for preventing exposure to the virus. The CDC has provided [posters](#) in multiple languages that encourage employees to stay home when sick, cough and sneeze etiquette, and proper hand hygiene practices. Consider posting these posters in the workplace.

Cleaning And Disinfection

You should establish routine sanitization of work and common spaces. Frequently touched surfaces should be disinfected regularly. Workers performing these additional cleaning and disinfection tasks may need additional PPE and training. Ensure that your hazard communication program is up to date and all employees are properly trained on the hazards related to cleaning the workplace.

Implement Comprehensive Screening And Monitoring Of Employees

You are encouraged to implement a comprehensive screening and monitoring program to prevent COVID-19 from entering the worksite. You should encourage employees to stay home if they feel sick and are exhibiting any symptoms related to COVID-19. You may also implement pre-shift screening, including taking employees' temperatures. You should not allow employees with symptoms or a fever of 100.4 degrees Fahrenheit or greater to enter the workplace.

You should implement a plan for contact tracing after an employee is confirmed to have COVID-19. You should follow the critical infrastructure [guidelines](#) released by the CDC for reintegrating workers who may have been exposed to COVID-19.

Personal Protective Equipment

As required by OSHA's PPE standards (29 CFR 1910 Subpart I), you should conduct a hazard assessment to determine if additional hazards exist that require additional PPE. If necessary, you should select and provide appropriate PPE. You must train workers on any new PPE.

Conclusion

Meat and poultry processing facilities are considered critical infrastructure employers. These businesses have an obligation to manage the continuation of work and return to work of their employees in ways that best prevent the spread of COVID-19 and promote the health of employees.

Fisher Phillips is equipped to assist employers in developing control and response plans that incorporate guidance released by the CDC and OSHA.

Fisher Phillips will continue to monitor the rapidly developing COVID-19 situation and provide updates as appropriate. Make sure you are subscribed to [Fisher Phillips' Alert System](#) to get the most up-to-date information. For further information, contact your Fisher Phillips attorney, any attorney in our [Workplace Safety and Catastrophe Management Practice Group](#), or any member of [our Post-Pandemic Strategy Group Roster](#). You can also review our [FP BEYOND THE CURVE: Post-Pandemic Back-To-Business FAQs For Employers](#) and our [FP Resource Center For Employers](#).

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