

Recommended Protocols for Dairy Farms When an Employee Tests Positive for COVID-19

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Background

Dairy production is part of our nation's "essential critical infrastructure" and must remain operational to continue to feed the country during these challenging times. Inconsistent approaches to reacting to an employee who tests positive for COVID-19 may jeopardize the health of other employees, their families, your family and the community, as well as the business continuity on the farm.

This document recommends a consistent approach to how a dairy farm can continue operations in the event an individual has tested positive, given the global COVID-19 pandemic and high transmissibility of this respiratory virus from person-to-person. This guidance relies on recommendations from the Centers for Disease Control and Prevention and OSHA and will cover recommendations on steps to be taken when:

- An employee tests positive for COVID-19 or has symptoms associated with COVID-19
- 2. An employee/facility visitor is exposed to an individual who is positive for COVID-19

Additionally, cleaning and disinfection guidelines and guidance for managing a reduced dairy farm labor force is provided.

For COVID-19 prevention and emergency preparedness resources, use our "<u>Coronavirus</u> <u>Prevention and Management Dairy Farmer Handbook</u>." Paid sick leave <u>guidance</u> for employers and additional coronavirus resources for dairy farmers are available on our <u>webpage</u>.

Steps to be taken when an employee tests positive for COVID-19

If an individual has the symptoms associated with COVID-19 or is diagnosed with COVID-19:

- 1. If the employee is onsite at the facility, send the employee home immediately; if the employee is at home, do not permit the employee to come to work.
 - a. If the farm provides employee housing where isolation is challenging, consider offering temporary alternative housing for that employee.
 - b. If the employee lives in farm-provided housing, consider effects on other employees and take steps to ensure that employee remains isolated while still receiving needed food and medical care. The CDC provides <u>guidance</u> for

caring for people who are sick at home, including how to prevent the spread of germs and when it's appropriate to end home isolation.

- 2. If the employee has not been tested but is symptomatic, encourage the employee to contact their local health department and physician to determine next steps.
- 3. Employees who have symptoms of acute respiratory illness are recommended to stay home and not come to work until they are free of fever (100.4° F or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines.
- 4. Employees should notify their supervisor and stay home if they are sick. CDC guidance states that if an employee has been tested and confirmed to be infected with COVID-19 and has not had a second test to determine if he/she are still contagious, that employee should not return to work until s/he has had no fever for at least 72 hours, other symptoms have improved, and at least seven days have passed since symptoms first appeared.
 - a. If the employee has a second test to determine if s/he is contagious, the employee can return to work if s/he no longer has a fever, other symptoms have improved and s/he has received two negative test results in a row, 24 hours apart.
 - b. A return-to-work note may or may not be needed as per <u>CDC guidance</u>.
- 5. Investigate the nature and scope of exposure of employee confirmed positive or with symptoms for COVID-19 to other facility employees, working with state and/or local public health authorities as the situation dictates.
 - a. Talk to employee if possible, via telephone or other means to obtain this information; use any other sources available, such as facility employees or family members to obtain this information.
 - b. If possible, determine which employees have been in physical contact with the person over the last 14 days.
- 6. Inform appropriate personnel, third parties and authorities.
 - a. Either verbally and/or in writing, tell other employees with whom the employee was in close contact with, that you believe they may have been exposed to the virus, keeping the identity of the ill worker confidential. "Close contact" is defined by the CDC as within approximately six feet of a COVID-19 case for a prolonged period of time or having direct contact with infectious secretions of a COVID-19 case (i.e. being coughed on).
 - i. Strongly consider sending those employees home for 14 days, using CDC and OSHA <u>risk assessment guidance</u>, in conjunction with the guidance of state and/or local public health authorities.

- b. Work with local and/or state public health authorities to advise the potentially exposed employees of the <u>symptoms of COVID-19</u> and <u>how to conduct a</u> <u>personal risk assessment</u>.
- c. A decision will need to be made, based on the results of the investigation, the scope of the workforce that needs to be informed.
- d. Contact relevant third parties who may have been exposed.
- e. Make an OSHA record/report <u>if required</u>. OSHA's recent guidance says a report is required if:
 - i. There is a confirmed case of COVID-19
 - ii. It is contracted due to an employee performing work-related duties, and
 - iii. It meets other standards for OSHA reporting (i.e. more than one day away from work or medical treatment beyond first aid)
- f. Notify workers' compensation carrier and provide claim form to employee
- 7. Take steps to protect the workplace
 - a. Immediately undertake the appropriate cleaning measures of the affected workspace or facility
 - b. Initiate cleaning and disinfection procedures in the impacted areas of the facility (see "Cleaning and Disinfecting" section below).

Steps to be taken when an employee/facility visitor is exposed (in close contact) with an individual who is positive for COVID-19

 Identify potentially exposed individuals who were in close contact with the infected individual. "Close contact" is defined by the CDC as within approximately six feet of a COVID-19 case for a prolonged period of time or having direct contact with infectious secretions of a COVID-19 case (i.e. being coughed on).

Unless advised by local authorities, other individuals in the facility should not be considered high risk for infections, do not require special treatment and may continue working as normal after surfaces are cleaned and disinfected, as described below.

- 2. In accordance with HIPAA requirements, inform individuals of potential exposure and working with local authorities and the individuals' health care providers, consider if it is appropriate to quarantine, self-monitor or take a different action.
- 3. For employees who learn they have been exposed to the virus outside of the workplace, send them home.
- Individuals that have been exposed to someone who is confirmed to have COVID-19
 or is showing the symptoms of this virus should stay home at least 14 days from the
 last exposure.

Per <u>CDC guidance</u>, some personnel fill critical infrastructure roles within communities. Based on the needs of individual jurisdictions, and at the discretion of state or local health authorities, these "critical infrastructure" personnel may be permitted to continue work following potential exposure to COVID-19 (either travel-associated or close contact to a confirmed case), provided they remain asymptomatic.

Personnel who are permitted to work following an exposure should self-monitor under the supervision of their employer's occupational health program including taking their temperature before each work shift to ensure they remain afebrile. On days these individuals are scheduled to work, the employer's occupational health program could consider measuring temperature and assessing symptoms prior to their starting work.

Cleaning and Disinfection Guidelines

As soon as an employee is identified who has tested positive for COVID-19 or has symptoms associated with this virus, <u>clean and sanitize the facility</u> according to <u>CDC</u> <u>guidance</u>. <u>EPA registered disinfectants</u> should be used.

Managing with a Reduced Labor Force

An <u>Emergency Action Plan</u> or other readiness plan should be prepared and used if needed during this time to provide pertinent information and steps for a dairy farm to follow to ensure consistency in farm operations during this crisis. <u>Protocols</u> should be written, translated (if needed) and shared with the appropriate staff in case of emergency.

If your workforce is impacted and you are unable to recruit and train additional employees in a timely manner, focus on maintaining essential tasks, replacing critical persons and <u>cross</u> <u>training employees</u> for necessary jobs.

For example, some tasks that must continue on the current schedule include feed delivery, milking, and manure management. Other tasks that should continue but could be considered for a reduced schedule if needed include scheduled maintenance, reproduction program and adjusting milking routines. Non-essential meetings including sales visits, team meetings and farm tours should be suspended unless a remote option is available.

If an owner (sole proprietor), manager or other critical person becomes ill or needs to selfquarantine, <u>CDC guidelines</u> should be followed and the infected person should rely entirely on remote communications to keep the farm operations intact. If possible, next-level employees should be assigned temporary management responsibilities or outside managers should be considered if the infected person becomes too sick or hospitalized to manage remotely.

Sources

1. NMPF et al. "Food Industry Recommended Protocols When Employee/Customer Tests Positive for COVID- 19" March 22, 2020. Accessed March 31, 2020. <u>https://www.nmpf.org/wp-content/uploads/2020/03/3-23-20-Positive-Test-Protocol-Final.pdf</u> 2. Cornell University Agricultural Workforce Development. "COVID-19 and Your Dairy Webinar" March 20, 2020. Accessed March 31, 2020. https://cornell.app.box.com/s/bydy2fo8oucojrfzu7qak0u0j8jkmtj8.