
Completed by the University of Wisconsin Population Health Institute in collaboration with the Community Resilience and Response Task Force - Current Draft 6.1.2020

Audience

This document is intended for use by local health departments and organizations encountering undocumented workers in any part of their COVID-19 containment strategy. If you believe an outbreak is happening in your community and undocumented folks might be impacted, please consider the recommendations and best practices outlined in this resource. To use the recommendations in this resource, it is not necessary to confirm the immigration status of people in your community, rather addressing the specific ways these communities might be impacted will enhance the inclusivity of your containment approach overall.

This is a particularly challenging time for all immigrants in Wisconsin, many of whom have been hard hit by job losses and some of whom are not eligible for relief recently offered by the federal government (1). For people who are undocumented, these challenges are even greater. Many of these essential workers are living and working in high-risk industry settings - without the ability to practice physical distancing. It is critical that all undocumented workers know their rights at work and have the information and protections they need to ensure their health, safety, and well-being during this unprecedented time.

This resource is informed by a landscape scan of national efforts focused on supporting people who are undocumented through the COVID-19 pandemic (completed by the University of Wisconsin - Madison Population Health Institute), advocates from across the state, and learnings from recent COVID-19 outbreak response efforts in Wisconsin.

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
# Table of Contents

Introduction 4

Background 5
   Immigrant Communities in Wisconsin 5
   Undocumented Workers in Wisconsin 5
   Supporting workers who are undocumented throughout the COVID-19 pandemic 6

Best Practices for Employers 7
Including considerations for how undocumented workers could be uniquely impacted as well as recommendations that we’ve learned from past outbreak response efforts in Wisconsin.

Best Practices for Outbreak Response 11
Including recommendations for supporting and advocating for people who are undocumented.

Additional Resources 14

---

*In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.*

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.*
Introduction

People have been immigrating, migrating, and settling in Wisconsin for thousands of years and their pathways are not monolithic. Some people traveled to Wisconsin alone, others with their families. Some people move to Wisconsin in search of a better life, others due to persecution, or natural disasters and many due to the socioeconomic conditions in their home countries (2).

Whatever each person’s story is, we are all worthy of respect and dignity, and we all deserve to have what we need to be healthy and safe. COVID-19 has spotlighted problems in our state that prevent many people from having the opportunity to be healthy such as lack of access to affordable health care and stable insurance, discrimination based on race, ethnicity, and immigration status, lack of resources available in people’s preferred language, and working conditions that prevent people from being physically distant.

Cultural considerations are critically important in any support and response efforts. How people and communities live and work should inform our public health response to COVID-19 and humanize our efforts. In order to address the impact of this pandemic on people who are undocumented in Wisconsin, our efforts should directly address their needs and concerns. This moment makes clear that every person's health is intertwined with those of our fellow community members, and we are only as safe as those who are at most risk. When we address the needs of people who are undocumented in our community, we all do better. When we take care of each other, we thrive together.

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
Background

Immigrant Communities in Wisconsin

In 2016, Wisconsin was home to more than 274,000 immigrants. The top countries of origin for immigrants living in Wisconsin in 2015 were Mexico (31.6 percent), India (8.1 percent), Laos (6.6 percent), Thailand (3.7 percent), and China (3.5 percent). While 5 percent of Wisconsin’s population was born in another country, over 7 percent of residents are US born with at least one immigrant parent. These largely working-age residents are playing a valuable role in the workforce. For example, over 22 percent of all Wisconsin farmers, fishers, and foresters are immigrants, as are 12 percent of residents working in the computer and math sciences. As workers, business owners, taxpayers, and neighbors, immigrants are an integral part of Wisconsin’s diverse and thriving communities and make extensive contributions that benefit all (3).

Immigrants working in Wisconsin contribute to a wide range of different industries in the state—many of which are growing and essential parts of the local economy. Immigrant residents make up more than one in three employees in the state’s meatpacking and processing industry. They also account for 16.4 percent of the workers in the segment of manufacturing that includes semiconductor processors, assemblers, and those moving freight, stock, and materials by hand. Immigrant workers frequently gravitate toward sectors where employers may struggle to find enough interested U.S.-born workers. Immigrants in Wisconsin, for instance, make up 21.8 percent of workers providing services to buildings and dwellings, an industry that includes exterminators and office cleaning staff (4).

While immigrant workers make up 5.6 percent of the state’s employed population, they account for 19.4 percent of those who work in the subset of agriculture jobs that include laborers in fields and the state’s many dairy farms. They also make up 22.5 percent of physicians and surgeons, and 17.5 percent of workers in a set of computer related occupations (4).

Undocumented Workers in Wisconsin

In 2019, Wisconsin was home to an estimated 86,000 residents who were undocumented. Undocumented immigrants benefit our communities by bringing cultural and economic vibrancy, entrepreneurship, and an expanded workforce for some of the state’s most critical industries (5).
In Wisconsin, undocumented workers contribute to a range of industries that could not thrive without a pool of workers willing to take on highly labor-intensive roles. In 2014, for instance, undocumented workers made up 7.8 percent of all employees in Wisconsin’s accommodation and food services industry, a sector that includes dishwashers, food preparation workers, and short order cooks. They also made up 8.3 percent of workers employed in the agriculture sector, as well as 6.9 percent of workers in Wisconsin’s administrative, support, and waste management services industry. In some sectors, such as agriculture, undocumented immigrants account for 50 percent of all hired crop workers, making them a critical reason why the industry is able to thrive (4).

Large numbers of people who are undocumented in Wisconsin have also overcome licensing and financing obstacles to start small businesses. In 2014, an estimated 5.5 percent of the state’s working-age undocumented immigrants were self-employed. Roughly 3,000 undocumented immigrants in Wisconsin were self-employed in 2014, many providing jobs and economic opportunities to others in their community. Undocumented entrepreneurs in the state also earned an estimated $43.6 million in business income that year (4).

**Supporting workers who are undocumented throughout the COVID-19 pandemic**

It is worth restating that this is a particularly challenging time for immigrants in Wisconsin, many of whom have been hard hit by job losses and some of whom are not eligible for relief recently offered by the federal government (1). For people who are undocumented, these challenges are even greater. Many of these essential workers are living and working in high-risk industry settings - without the ability to practice physical distancing. It is critical that all undocumented workers know their rights at work and have the information and protections they need to ensure their health, safety, and well-being during this unprecedented time.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.*
Best Practices for Employers

Please reference the following best practices to support the needs and health of undocumented workers as a part of your COVID-19 containment strategies.

1. Communicate frequently with workers in their preferred language (verbal, visual, written; can also use WhatsApp, create community-specific Facebook or text groups) regarding COVID-19 available resources and updates. Recognize the increased fear and anxiety a worker may experience following a positive test result: exercise empathy and offer additional proactive communications, patience, and responsive support. Beyond translation, consider information that may be critical for people who are undocumented (ex.: call out when resources do not require citizenship or permanent residency, describe how information will be shared or not shared with other agencies, etc.)

2. Honor that many undocumented workers and their families live and work with heightened exposure risk, meaning the fear and anxiety they feel waiting for their test results does not disappear when they receive a negative test result. In addition, understand that some undocumented workers might face isolation and mental health needs, as they are far away from their homeland, families and support systems.

3. Understand that sometimes people may be reluctant to share if they have been in close contact with other people who are undocumented out of fear that they themselves may get in trouble or get others in trouble "with the law." If this is the case, provide assurance that information will be kept confidential.

4. Resources and information around the COVID-19 pandemic are dynamic and changing rapidly - consider collaborating with trusted sources of information in your community: immigrant services organizations; churches with significant immigrant or ethnic populations or those who provide community services to ensure workers have access to reliable sources of information and open lines of communication.

5. Provide essential worker ID cards or other documentation to all workers.

---

1 This heightened exposure is due in large part to living and working in settings where many people spend extended amounts of time in spaces where they are unable to practice physical distancing.

---

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
6. Work with your local health department, healthcare systems, or state health department to try to make testing available at no cost to all workers who need it in high-risk settings. Testing sites should not require documentation to prove personal identity, immigration status, residency, work location or any other personal qualifying factors to access this resource. Make testing available to all who reside with workers at the same testing sites to minimize travel. If testing cannot be offered onsite, provide regular updates on nearby community testing sites and ensure information is available in preferred languages. Have interpreters available on-site to communicate with workers coming in for testing. Ensure communication clearly states that testing is available regardless of immigration status.

7. Be mindful that the presence of law enforcement military, or similar authority figures may inhibit undocumented workers from pursuing testing. It is recommended that if the National Guard or other law enforcement is supporting testing, they present in plain clothes or scrubs.

8. Ensure workers have health care or assist in determining eligibility for coverage of COVID-19 testing and treatment (Medicaid or other). Collaborate with local community health centers and low cost/free clinics in your community to ensure all workers and their families can access available health care services - including undocumented workers.
   a. Wisconsin: [https://www.wphca.org/page/FindHealthCenter](https://www.wphca.org/page/FindHealthCenter)
   c. For women and families in need of low-cost health clinics: Planned Parenthood or other reproductive health low cost or free clinics that might be present in your community.
   d. If you are experiencing an emergency, emergency rooms and hospitals that receive Federal Funding (most do) cannot turn away patients.
   e. If you are pregnant, you can get health insurance in Wisconsin, regardless of immigration status. The BadgerCare Plus Prenatal Plan provides healthcare for pregnant women who are not otherwise eligible for BadgerCare Plus because of their immigration or citizenship status. To apply contact Member Services at 800-362-3002.
   f. Help families that have questions or fears about immigration and public benefits connect to reliable information and resources by going to: [https://www.coveringwi.org/immigration](https://www.coveringwi.org/immigration)

9. Connect with local community health workers networks to align resources and support for undocumented workers and their families. Community Health Workers and health educators can help navigate local resources and make connections to health care services and social services that may be available to people who are undocumented. Visit the Wisconsin CHW Network website for more on available information, resources and education.

**In Wisconsin, we take care of each other.** Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.*
10. Supply employees with non-surgical cloth masks/face coverings to make following current WI Department of Health Services guidance as easy as possible. Provide onsite cleaning for soiled cloth masks/face coverings at no charge to employees.

11. Follow recommendations including scheduled handwashing breaks (and provide necessary supplies such as hand washing stations and/or hand sanitizer); barriers between beds/sinks/close contact areas where physical distancing is not possible; cohort work crews and living quarters. For detailed best practices see the Housing and Workplace Best Practices for Migrant Seasonal Agricultural Workers developed by the Wisconsin Farmworkers Coalition.

12. Ensure employees living at worksites who need to be isolated have separate sleeping, cooking, and bathing facilities; food delivery; daily symptom and temperature checks; assistance with accessing medical care, including safe transportation. Work in collaboration with your local health department for support implementing isolation guidance. For detailed best practices, see Housing and Workplace Best Practices for Migrant Seasonal Agricultural Workers developed by the Wisconsin Farmworkers Coalition.

13. For workers who don’t live in employee sponsored housing, make sure workers have access to the most up-to-date guidance and information from Wisconsin Department of Health Services and Centers for Disease Control and Prevention about best practices to keep themselves and their families safe at home (i.e. hand washing, physical distancing outside of immediate family, making trips to high traffic areas only when essential - etc.). Work in collaboration with your local health department to ensure alternative isolation facilities are available to those who need additional support.

14. Do not terminate employment for those who are sick with or have been exposed to COVID-19. For individuals who don’t live in Wisconsin year round - do not insist they return back to their primary place of residence following a positive COVID-19 test result or confirmed exposure.

15. Implement or maintain flexible sick leave policies that permit employees to stay home to care for a sick family member or take care of children due to school and childcare closures. At minimum, draft non-punitive “emergency sick leave” policies. Ensure that policies are flexible and consistent with public health guidance and that employees are aware of and understand these policies. Do not require a positive COVID-19 test result or a health care provider’s note for employees who are sick to validate their illness, qualify for sick leave, or

2 Connect with your local public health department early - having a plan to support isolation needs before there’s an outbreak can help ensure response efforts can best meet the needs of workers and their families quickly and prevent further spread.

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
return to work. Consider providing paid sick leave as part of emergency sick leave policies to encourage workers to stay home when they are ill.

16. Encourage workers to connect with each other and form plans for mutual support (in a format that adheres to physical distancing best practice). Mutual support could look like contacting each other if workers need to find someone to cover shifts, sharing information, assisting with day to day needs in case one a family member gets sick (like school pickups or grocery shopping), and raising funds to support each other if folks lose work and income in this time.

17. Challenge dominant narratives that seek to “other” people who are undocumented. Sometimes people make racist / xenophobic remarks such as highlighting a set of circumstances that people are living in or experiencing as “different” or “wrong” - this kind of judgement pits our lived experiences against one another. If you witness such remarks, calmly point out that we are all members of the same community and everyone deserves to be safe. There is no time for us vs. them. We’re only as safe as the members of our communities who are at most risk - we need to be in this together.

18. Prevent and stop racist responses and false information related to COVID-19. Share accurate information about how the virus spreads from reputable sources (CDC/DHS). Remind folks that diseases can make anyone sick regardless of their race or ethnicity. Stand in solidarity with immigrant, refugee, and undocumented workers - especially Asian American and Pacific Islander (6) workers – by standing up to discrimination or other forms of abuse.

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
Best Practices for Outbreak Response

Please reference the following best practices for responding to COVID-19 outbreaks that may impact undocumented workers. These recommendations are aligned to the box it in strategy (7) Wisconsin is using to prevent community spread and are informed by past outbreak response efforts in Wisconsin.

Test Widely

A. Ensure people being tested have access to accurate information in their preferred language (verbal, visual/posters, written; can also use WhatsApp, create community-specific Facebook or text groups). This can include resources that describe:
   i. What is COVID-19?
   ii. What is the local containment strategy? Including testing process, tracing process, follow-up, isolation and quarantine.
B. Use evidence and equity-based approaches to develop community-testing strategies
C. Recognize the increased fear and anxiety a worker may experience following a positive test result - exercise empathy and offer additional proactive communications, patience, and responsive support. Beyond translation, consider information that may be critical for people who are undocumented (ex.: call out when resources do not require citizenship or permanent residency, describe how information will be shared or not shared with other agencies, etc.) Do not ask for ID, DOB, or SSN when it is not absolutely required.
D. Include community members in strategy development - consider using community conversations as a method to engage small group dialogue.
   i. Hosting community conversations (in a format that adheres to physical distancing best practice):
      1. Prepare your materials - be sure to address
         a. What is COVID 19
         b. What is the process to keep folks safe when there are positive cases in the community?
         c. What is the local containment strategy (testing process, tracing process, follow-up, isolation and quarantine)?
         d. Does everyone have an aligned strategy?
      2. Support folks to be solutions oriented
         a. Collect concerns prior to the meeting so that you have a pulse on needs that should be considered/addressed

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.
b. Come with ideas
   a. What are possible locations for testing sites?
   b. What resources will be needed to stand up resources quickly?
   c. What unique needs can we plan for (ex. religious and spiritual practices that need to be supported in this community)?
   c. Messaging strategy - how can people expect to communicate/engage with and receive information from you?
   d. What role can everyone play? What will your role be?
   e. What incentives are available for those who participate in planning/strategy development - how will you compensate people for their time/contributions?

ii. Establish a process for communicating the local testing strategy to community leaders and community members include (1) Testing, (2) Tracing, (3) Isolation and Quarantine, (4) Follow-up, (5) Resources

iii. Engage local media in your communications efforts to highlight
   1. Positive stories that represent those most impacted and that highlight the resiliency of immigrant communities
   2. Local stories of those that went through the process
   3. Stories of local leaders - faith leaders, school leaders etc.
   4. Don’t forget about including young people as critical messengers

iv. Identify testing locations
   1. Is it a community trusted space?
   2. Is it accessible to community members? Transportation, etc?
   3. What can you do to alleviate barriers folks may face to access (i.e. transportation vouchers, extended hours, etc.)?

v. Establishing a safe and accessible testing environment
   1. Do people feel safe entering a test site?
   2. Do staff and testers appear welcoming?
   3. Is the National Guard or law enforcement in uniform? Be mindful that the presence of law enforcement, military, or similar authority figures may inhibit undocumented workers from pursuing testing. It is recommended that the National Guard present in plain clothes or scrubs.
   4. Do you have interpreters/translation available on site?

vi. Establish an accessible call line for people with questions

---

*In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.*

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.*
vii. Publish a resource that answers frequently asked questions (ex. expectations around facilities closure, data on positive tests, no identification required, reminders that testing is offered to everyone regardless of immigration status, how information will be shared or not shared with other agencies etc).

Isolate all people with positive tests & quarantine all contacts (self-isolate for 14 days)

A. Identify safe places for people to isolate. Communicate transparently about where these sites are and what proactive steps are being taken to keep people safe
B. Connect all people in isolation and quarantine and their families to resources
   i. Food
   ii. Basic needs
   iii. Domestic/interpersonal violence, neglect, abuse
   iv. Legal resources
   v. Healthcare services
   vi. Cleaning supplies
   vii. Medication
C. Provide written documentation for workers to share with their employers that includes any documentation of required time off work
D. Communicate regularly and using multiple messaging channels

Identify and inform everyone who has been in contact with anyone who has tested positive for COVID-19

A. Work with your local health department to understand the process for contact tracing
B. When possible - encourage contact tracing to happen physically at worksites
C. Assure people the purpose of contact tracing conversations and how information will be used - ensure this is aligned to actual protocol and that this commitment is followed by all stakeholders involved.
D. All contact tracing efforts should happen in workers preferred language - literacy levels should be considered
E. Resources for families should be part of the communications/messaging strategy
F. Communicate regularly and using multiple messaging channels

In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
Additional Resources

The following is a collection of publicly available resources for quick reference - this is not a comprehensive list. If you have resources to add please reach out to the Community Resilience and Response Task Force.

National Resources

1. Centers for Disease Control and Prevention - [Homepage](#)
   a. [COVID-19 specific resource page](#)
2. Illinois Coalition for Immigrant and Refugee Rights - [Homepage](#)
   a. [COVID-19 Resources for Undocumented Communities](#)
3. Immigrants Rising - [Homepage](#)
   a. [Support for Undocumented Communities During COVID-19](#)
4. Informed Immigrant - [Homepage](#)
5. National Employment Law Project - [Homepage](#)
   a. [FAQ: Immigrant Workers’ Rights and COVID-19](#)
   b. [Worker Safety & Health During COVID19 Pandemic: Rights & Resources](#)
6. Occupational Safety and Health Administration - [Homepage](#)
   a. [Wisconsin offices](#)
7. UMOS - [Homepage](#)

State and Local Resources

1. Wisconsin Department of Health Services - [Homepage](#)
   a. [COVID-19 Specific Resource Page](#)
   b. [Resilient WI - Community Specific Resources](#)
   c. [COVID-19 Translated Resources Page](#)
2. Centro Hispano - Dane County - [Homepage](#)
3. Covering Wisconsin - [Homepage](#)
   a. [COVID-19 Specific FAQ](#)
4. Latino Health Council - Dane County - [Homepage](#)
5. Legal Action of Wisconsin - [Homepage](#)
   a. [Farmworker Project Contact Page](#)
   b. [2020/2021 Outreach Calendar](#)
6. Mexican Consulate - Milwaukee Office - [Homepage](#)

---

*In Wisconsin, we take care of each other.* Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.*
In Wisconsin, we take care of each other. Our well-being is bound to each other, and we refuse to leave anyone behind. It is our collective responsibility to cultivate strong, healthy communities.

*It is not necessary to confirm immigration status to follow these best practices. Addressing the specific ways undocumented workers are uniquely impacted will enhance the inclusivity of your containment approach overall.
Agricultural Employer Checklist for Creating a COVID-19 Assessment and Control Plan

To prevent and slow the spread of COVID-19, agricultural employers can use this checklist to create a COVID-19 assessment and control plan for applying specific preparation, prevention, and management measures. This checklist has been developed based on the Agriculture Workers and Employers Interim Guidance from CDC and the U.S. Department of Labor.

This checklist has five sections:
  * **Section 1:** Assessment
  * **Section 2:** Control Plan based on the Hierarchy of Controls
    * Screening and Monitoring Workers
    * Managing Sick Workers
    * Addressing Return to Work after Worker Exposure to COVID-19
    * Engineering Controls
    * Cleaning, Disinfection, and Sanitation
    * Administrative Controls
    * Personal Protective Equipment (PPE)
  * **Section 3:** Special Considerations for Shared Housing
  * **Section 4:** Special Considerations for Shared Transportation
  * **Section 5:** Special Considerations for Children

This checklist can be used to reassess, update, and modify your assessment and control plan on a regular basis or as conditions change.
<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider the characteristics of your region, worksite, space, and job tasks that may impact your assessment and control of COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Monitor federal, state, and local public health communications about COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure workers have access to current information.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Check local public health information and the <a href="https://www.cdc.gov/coronavirus/2019-ncov/index.html">CDC COVID-19 website</a> daily, or as needed depending on local conditions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Designate a workplace coordinator responsible for COVID-19 assessment and control planning.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure all workers know how to contact the coordinator.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure coordinator communicates in workers’ preferred languages.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure coordinator provides materials in preferred languages and at the appropriate literacy level.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide workers with information about where to get COVID-19 testing.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regularly conduct work site assessments to identify COVID-19 risks and prevention strategies.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Screening and Monitoring Workers

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop uniform policies and procedures for screening workers for COVID-19 signs and symptoms.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Screen workers before they enter the worksite or, if possible, before they board shared transportation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct verbal screenings to check for symptoms using workers’ preferred languages.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Check workers’ temperatures at the beginning of each shift, identifying anyone with a fever of 100.4°F or greater.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do not let workers who indicated having symptoms or who have a fever of 100.4°F or greater enter the workplace.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encourage workers to report symptoms immediately, when on site.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encourage workers who have symptoms to self-isolate and contact a healthcare provider.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide workers who have symptoms with access to direct medical care or telemedicine, when appropriate.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coordinate any recommended diagnostic testing with the occupational medicine provider or state and local health officials.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide workers with information on when it is safe to return to work and the operation’s return-to-work policies and procedures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inform human resources, health unit (if in place), and supervisor so workers can be moved off schedule and replacements assigned.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure personnel performing screening activities are protected.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Train temperature screeners to use temperature monitors according to manufacturer instructions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide temperature monitors that are accurate under conditions of use (e.g., extreme hot or cold weather).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Use social distancing, barrier or partition controls, and personal protective equipment (PPE) to protect screeners.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide appropriate PPE to screeners who must be within 6 feet of workers, including gloves, gown, face shield, and face mask (at minimum).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Train workers how to properly put on, take off, and dispose of all PPE.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Managing Sick Workers

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitor and manage sick workers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Immediately separate workers who appear to have symptoms from others in the workplace.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Have a procedure for safely transporting sick workers to housing or a healthcare facility.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>House sick workers who can’t be isolated in their existing housing arrangement in alternative housing arrangements under quarantine away from other workers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure sick workers avoid contact with animals, including livestock and pets.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide sick workers with information on when and how to access medical attention (e.g., the Health Resources and Services Administration (HRSA) website).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide sick workers with information on the operation’s return to work policies and procedures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protect personnel who are managing sick workers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide appropriate PPE to personnel managing sick workers and those needing to be within 6 feet of them (gloves, gown, face shield, and face mask, at minimum).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Train them to properly put on, take off, and dispose of PPE.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop an action plan for workers with suspected or confirmed COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inform anyone who has been in close contact (within 6 feet) with the sick worker of their possible exposure to COVID-19, but protect the sick worker’s confidentiality.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and disinfect the work area, equipment, common areas, and tools the sick worker used.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If there is a sick worker in employer-furnished housing:</td>
<td>N/A</td>
<td></td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Provide a dedicated space for the worker to recover, away from others.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and disinfect living quarters, cooking and eating areas, bathrooms, and laundry facilities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do not allow other workers to use shared areas until after they are cleaned and disinfected.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Completed</td>
<td>Ongoing</td>
<td>Not Started</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>---------------------------------------------------------------------</td>
<td>-----------</td>
<td>---------</td>
<td>-------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Provide a sick worker going to a home in the community with guidance to reduce the risk of spread in the home.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Work with state, tribal, local, and territorial (STLT) health officials to identify other exposed individuals.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consult with STLT officials for guidance on testing and workplace contact tracing.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure on-site healthcare personnel follow appropriate CDC and OSHA protective guidance for healthcare and emergency response personnel.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Addressing Return to Work after Worker Exposure to COVID-19

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plan for workers returning to work after having or being exposed to COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow <a href="https://www.cdc.gov">CDC’s Critical Infrastructure Guidance</a> for workers who have had a COVID-19 exposure but do not have symptoms.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implement strategies from <a href="https://www.cdc.gov">CDC’s COVID-19 Critical Infrastructure Sector Response Planning</a> to manage continuation of work while protecting the health of workers and the public.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow the <a href="https://www.cdc.gov">CDC interim guidance Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings</a> for COVID-19-positive workers returning to work.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>As workers return, reassess COVID-19 transmission levels in the area and follow local, state, and federal recommendations as well as state and local directives for businesses.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Completed</td>
<td>Ongoing</td>
<td>Not Started</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>-----------</td>
<td>---------</td>
<td>-------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Establish social distancing policies and practices.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assess and identify opportunities to limit close contact (less than 6 feet) between all individuals at the workplace.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adjust workflow to allow for at least a 6-foot distance between workers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Install shields or barriers between workers when a 6-foot distance is not possible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Add additional (touch-free, if possible) time clock stations or allow more time to clock in/out to reduce crowding.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Remove or rearrange chairs or add visual cues in break areas to support social distancing.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Train workers to follow protective measures while on breaks.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Cleaning, Disinfection, and Sanitation**

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Promote hand hygiene.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encourage workers to <a href="#">wash their hands</a> often with soap and water for at least 20 seconds.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide access to permanent and/or temporary hand washing facilities equipped with soap, clean water, and clean, single-use towels.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Increase the number of hand washing stations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>When soap and water are not immediately available, provide access to temporary stations equipped with hand sanitizer containing at least 60% alcohol.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Place sanitizing stations in multiple locations including entry/exit and time clock station(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If possible, provide workers with individual containers of hand sanitizer to use in field settings.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct disinfection and sanitation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop <a href="#">sanitation protocols</a> for daily cleaning and sanitation of work sites, where feasible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop cleaning and disinfecting procedures for high-touch areas such as tools, equipment, and <a href="#">vehicles</a>, following <a href="#">CDC guidance on cleaning methods</a>.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Follow cleaning product manufacturers’ contact time recommendations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Keep cleaning chemicals and hand sanitizer out of reach of children.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Choose disinfectants or alternative cleaning methods (e.g., soap and water) for surfaces with which food comes into contact.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Obtain additional <a href="#">information from EPA on cleaning and disinfecting workplaces</a>.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct targeted and more frequent <a href="#">cleaning and disinfecting</a> of high-touch areas (e.g., time clocks, bathroom fixtures, vending machines, railings, door handles).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and disinfect break areas daily and between each group.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and disinfect locker rooms after each shift.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[**Wash their hands**](#): Encourage workers to wash their hands often with soap and water for at least 20 seconds.

[**Sanitation protocols**](#): Develop sanitation protocols for daily cleaning and sanitation of work sites, where feasible.

[**CDC guidance on cleaning methods**](#): Follow CDC guidance on cleaning methods.

[**Information from EPA on cleaning and disinfecting workplaces**](#): Obtain additional information from EPA on cleaning and disinfecting workplaces.

[**Cleaning and disinfecting**](#): Conduct targeted and more frequent cleaning and disinfecting of high-touch areas (e.g., time clocks, bathroom fixtures, vending machines, railings, door handles).
Provide disposable disinfectant wipes to frequently clean commonly touched surfaces. | Completed | Ongoing | Not Started | Not Applicable |
--- | --- | --- | --- | --- |
Refer to the Transportation Section (below) for guidance on sanitizing farm vehicles. | Completed | Ongoing | Not Started | Not Applicable |
Prevent or limit sharing of tools, when possible. | Completed | Ongoing | Not Started | Not Applicable |
Clean and disinfect shared tools between each worker use. | Completed | Ongoing | Not Started | Not Applicable |
If cleaning tools after each use is not possible, conduct daily targeted and more frequent cleaning of tools. | Completed | Ongoing | Not Started | Not Applicable |
Dispose of all cleaning material and PPE in compliance with OSHA standards. | Completed | Ongoing | Not Started | Not Applicable |

**Administrative Controls**

Conduct COVID-19 training that is easy to understand, in preferred languages, and at appropriate literacy levels. | Completed | Ongoing | Not Started | Not Applicable |
--- | --- | --- | --- | --- |
Provide accurate and timely information to workers about: | Completed | Ongoing | Not Started | Not Applicable |
| Signs and symptoms of COVID-19, how it spreads, risks for workplace exposures, and how workers can protect themselves | N/A | N/A | N/A | N/A |
| Proper **handwashing** and use of hand sanitizer | Completed | Ongoing | Not Started | Not Applicable |
| Farm-specific social distancing practices | Completed | Ongoing | Not Started | Not Applicable |

**Cough and sneeze etiquette**

Putting on and taking off masks and gloves | Completed | Ongoing | Not Started | Not Applicable |

General social distancing measures | Completed | Ongoing | Not Started | Not Applicable |

What to do if you are sick | Completed | Ongoing | Not Started | Not Applicable |

Employer policies regarding COVID-19 (e.g., disinfection protocols, housing and worker isolation, sick leave polities) | Completed | Ongoing | Not Started | Not Applicable |

How workers should alert their supervisors if they have signs or symptoms of COVID-19 or recent close contact with someone with confirmed or suspected COVID-19. | Completed | Ongoing | Not Started | Not Applicable |

Place **posters**, in all preferred languages, at entrances and in break areas to reinforce training. | Completed | Ongoing | Not Started | Not Applicable |
<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Review leave and sick leave policies.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Modify policies to ensure ill workers can stay home and are not punished for taking sick leave.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure workers are aware of and understand sick leave policies.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Modify incentive policies so workers are not penalized for taking sick leave if they have COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consider leave flexibilities including advances on future sick leave or allowing workers to donate sick leave to each other.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Promote social distancing.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reduce crew sizes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stagger work shifts, mealtimes, and break times.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Have farmworkers work in alternate rows in fields to keep at least a 6-foot distance from other workers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Place materials and produce at a central transfer point instead of transferring directly from one worker to the next.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consider grouping healthy workers together into cohorts that include the same workers each day.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure workers who are in the same shared housing unit follow the Households Living in Close Quarters Guidance.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct training outside and in smaller groups, with participants spaced 6 feet apart.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**CDC recommends** wearing cloth face coverings as a protective measure in addition to social distancing.\(^1\)

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employers who determine that cloth face coverings should be worn in the workplace, including to comply with state or local requirements for their use, should ensure the cloth face coverings:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fit over the nose and mouth and fit snugly but comfortably against the side of the face</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are secured with ties or ear loops</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Include multiple layers of fabric</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allow for breathing without restriction (and are not worn by anyone with trouble breathing)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Can be put on and removed by the wearer without help</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do not lead to heat-related illness (OSHA's <a href="#">Heat page</a> offers tips on water and rest breaks)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape (a clean cloth face covering should be used each day)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are not used if they become wet or contaminated</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are replaced with clean replacements, provided by employer, as needed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are not shared among workers unless adequately laundered between uses</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are handled as little as possible to prevent transferring infectious materials to the cloth</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are not worn with or instead of <strong>respiratory protection</strong> when respirators are needed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^1\)CDC recommends wearing cloth face coverings as a protective measure in addition to social distancing (i.e., staying at least 6 feet away from others). Cloth face coverings may be especially important when social distancing is not possible or feasible based on working conditions. A cloth face covering may reduce the amount of large respiratory droplets that a person spreads when talking, sneezing, or coughing. Cloth face coverings may prevent people who do not know they have the virus that causes COVID-19 from spreading it to others. Cloth face coverings are intended to protect other people—not the wearer.

**Cloth face coverings are not PPE.** They are not appropriate substitutes for PPE such as respirators (like N95 respirators) or medical facemasks (like surgical masks) in workplaces where respirators or facemasks are recommended or required to protect the wearer.

While wearing cloth face coverings is a public health measure intended to reduce the spread of COVID-19 in communities, it may not be practical for workers to wear a single cloth face covering for the full duration of a work shift (e.g., eight or more hours) in agricultural operations if they become wet, soiled, or otherwise visibly contaminated during the work shift. If cloth face coverings are worn in these operations, employers should provide readily available clean cloth face coverings (or disposable facemask options) for workers to use when the coverings become wet, soiled, or otherwise visibly contaminated.

**Cloth face coverings may be difficult to wear for extended periods of time, especially in hot, humid environments.** They also may require touching of the face, repositioning of the coverings, and frequent removal and replacement for water or nourishment breaks. In such instances, social distancing will be very important. Employers may also consider providing workers with alternatives to cloth face coverings, such as face shields.
### Personal Protective Equipment (PPE)

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct a hazard assessment to determine if PPE is necessary to protect workers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure workers performing cleaning and disinfecting are provided with appropriate PPE based on information from Safety Data Sheets.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>When PPE is needed, consider additional hazards that may be created by poorly fitting PPE in the work environment and how to prevent such hazards.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide training on how to properly use PPE that is easy for workers to understand, in their preferred languages, and at appropriate literacy levels.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Use <strong>videos</strong> or in-person visual demonstrations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Keep workers at least 6 feet apart during demonstrations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training should include the following:</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>When to use PPE and what PPE is necessary</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>How to properly put on and take off PPE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>How to properly dispose of disposable PPE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>How to properly clean and disinfect reusable PPE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reminder to change PPE if it is torn, dirty, or otherwise damaged</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reminder to <strong>wash hands</strong> with soap and water for 20 seconds or use alcohol-based hand sanitizer containing at least 60% alcohol after removing PPE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allow workers to continue wearing gloves they would normally wear while doing fieldwork.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Agricultural Employer Checklist Section 3: Special Considerations for Shared Housing

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide basic guidance about COVID-19 and steps being taken to prevent transmission in housing areas.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Keep family members together in housing facilities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prepare dedicated and segregated spaces for sleeping quarters, kitchens, and restrooms for quarantining workers with confirmed or suspected COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Promote enhanced sanitation practices.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide disposable gloves, soap for handwashing, and household cleaners to help residents and staff implement personal preventive measures.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop and implement enhanced sanitation and cleaning plans:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Specify frequency of sanitation and cleaning.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identify a person responsible for carrying out the plan.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do not allow sharing of dishes, drinking glasses, cups, or eating utensils.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handle non-disposable food service items with gloves and wash with hot water and dish soap or in a dishwasher.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disinfect living quarters, cooking and eating areas, bathrooms, and laundry facilities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure there is good airflow in shared rooms:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Use an air conditioner or open windows.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean air conditioner units and change filters according to manufacturer recommendations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide air filtration systems in units without air conditioner units.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Routinely clean common areas following CDC cleaning and disinfection guidelines.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Completed</td>
<td>Ongoing</td>
<td>Not Started</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td>---------</td>
<td>-------------</td>
<td>----------------</td>
</tr>
<tr>
<td><strong>Ensure residents regularly clean and sanitize living quarters following CDC cleaning and disinfection guidelines.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Provide supplies for cleaning shared kitchen utensils and appliances.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Continue providing access to laundry facilities, but establish guidelines to ensure social distancing.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Provide options for residents to store reusable PPE to prevent cross-contamination.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Maintain social distancing in shared housing.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Encourage social distancing during all housing activities, including cooking, sleeping, and recreation.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Add physical barriers (if possible) between bathroom sinks and in other areas where maintaining 6 feet is not possible.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Remove or space furniture in common areas.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Modify bed configurations to maximize social distancing in sleeping quarters, where feasible:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Arrange beds so that residents sleep head-to-toe with at least 6 feet between beds.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Add physical barriers between beds when they cannot be 6 feet apart.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Minimize or avoid the use of bunkbeds.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Conduct meetings and conversations outdoors, whenever possible, to minimize congregation in close quarters.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Encourage residents to wear cloth face coverings in shared spaces.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Advise residents that cloth face coverings should not be placed on children under age 2, anyone who has trouble breathing or is unconscious, incapacitated or otherwise unable to remove the mask without assistance.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Item</td>
<td>Completed</td>
<td>Ongoing</td>
<td>Not Started</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>-----------</td>
<td>---------</td>
<td>-------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Conduct daily health checks at shared housing.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Screen residents for <strong>symptoms</strong> and check temperatures daily.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Offer multiple screening locations or staggered screening times to</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>prevent congregations of large groups.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protect the confidentiality of those with suspected or confirmed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Establish a plan for responding to residents with suspected or</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>confirmed COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide accommodations separate from residents who are not ill.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consider designating one person who is not at <strong>higher risk of severe</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>illness** to assist an ill, isolated resident.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure personnel managing sick residents are protected from</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>exposure by providing PPE for use when they are within 6 feet of</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>individuals who are sick.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Use separate buildings or rooms instead of physical barriers to</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>separate ill residents from well residents.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consider providing separate food and bathroom access where possible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Restrict non-essential persons from entering the isolation area.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide medical access and telemedicine for emergent illnesses.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide safe transportation, if necessary.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>For H-2A temporary housing considerations, review DOL</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>explanation of alternative housing arrangements in response to</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Agricultural Employer Checklist Section 4: Special Considerations for Shared Transportation

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide as much space between riders as possible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Group (or cohort) workers in the same crews and/or those sharing living quarters together when transporting.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Increase the number of vehicles and/or the frequency of trips.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide hand washing/sanitizing stations for use before riders enter a vehicle and when arriving at their destination.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Train riders to follow <a href="#">coughing and sneezing etiquette</a>.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encourage all vehicle occupants to wear <a href="#">cloth face coverings</a>.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean and disinfect vehicles in accordance with <a href="#">CDC guidelines for non-emergency transport vehicles</a> before and after each trip, or daily at a minimum.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Agricultural Employer Checklist Section 5: Special Considerations for Children

<table>
<thead>
<tr>
<th>Item</th>
<th>Completed</th>
<th>Ongoing</th>
<th>Not Started</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discourage the presence of youth at the worksite, and help protect youth farmworkers from COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encourage workers to send children to childcare while working.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Establish and enforce policies that restrict children from worksites.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you hire youth farmworkers, ensure you are following labor laws and assigning age-appropriate tasks, including those covered by child labor regulations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide extra supervision and guidance to youth workers, emphasizing ways they can reduce their exposure to COVID-19.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
COVID-19 (Coronavirus) and Your Dairy

Robert Lynch, DVM, Cornell PRO-DAIRY, rlynch@cornell.edu
and
Richard Stup, Ph.D., Cornell Agricultural Workforce Development, rstup@cornell.edu

March 20, 2020
Leadership

• This is a very stressful time for everyone, people are looking to their leaders for help

• Dairy owners and managers are experienced in dealing with stressful conditions and operating under sudden constraints

• Lead by example

• Encourage questions
  • All questions are good questions
  • Just because something seems obvious to you, do not assume it is obvious to everyone else
Disclaimer

• We are not health care professionals, all recommendations regarding health should come from health care professionals

• We are not attorneys, all information is for education purposes only

• This information is intended to help dairy management think about and organize daily farm operations through the lens of COVID-19 guidance, we do not have all the answers

• Information and recommendations are changing daily, so let’s keep the communication going throughout this emergency

• Specific company mentions are not intended as endorsements. They are examples highlighting the level of engagement exhibited across our industry
Ground Rules and Agenda

• Ask questions in the chat box

• Agenda
  • Why this is important
  • Protecting your employees
  • Prevention and social distancing
  • What to do with a suspected or confirmed case of COVID-19
  • Managing in a disease-altered business environment
Flattening the Curve

Graphic Source: New York Times, March 11, 2020

Adapted from CDC / The Economist
Protect Your Employees
Prevention & Control Resources

• Talk with employees about coronavirus, how it spreads, and how to prevent infection

• New York State Department of Health has a Coronavirus Website with English and Spanish posters for preventing coronavirus infection
  • (https://health.ny.gov/diseases/communicable/coronavirus/)

• U.S. Centers for Disease Control and prevention (CDC) provides clear guidance about preventing infection in both English and Spanish.
  • CDC printable factsheets and posters
  • Download at: https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html

• Post information in your workplace and employee housing.
STOP THE SPREAD OF GERMS

Help prevent the spread of respiratory diseases like COVID-19.

Avoid close contact with people who are sick.

Cover your cough or sneeze with a tissue, then throw the tissue in the trash.

Clean and disinfect frequently touched objects and surfaces.

Avoid touching your eyes, nose, and mouth.

Stay home when you are sick, except to get medical care.

Wash your hands often with soap and water for at least 20 seconds.

cdc.gov/COVID19

DETENGA LA PROPAGACIÓN DE LOS MICROBIOS

Ayude a prevenir la propagación de enfermedades respiratorias como el COVID-19

Evite el contacto cercano con las personas enfermas.

Coloque la nariz y la boca con un pañuelo de uso desechable al toser o estornudar y luego hágalo a la basura.

Evite tocar los ojos, la nariz y la boca.

Limpie y desinfecte los objetos y las superficies que se tocan frecuentemente.

Quítese en casa si está enfermo, excepto para buscar atención médica.

Lávese las manos frecuentemente con agua y jabón por al menos 20 segundos.

cdc.gov/COVID19-es
Some quick reminders

• Cows cannot catch COVID-19, therefore people will not give it to cows or catch it from cows.
  • The coronaviruses we manage in livestock are different than COVID-19
  • No evidence that companion animals, including pets, can spread COVID-19

• Currently there is no evidence that suggests that COVID-19 is transmitted through food consumption, according to the FDA, CDC, and European Food Safety Agency (EFSA).
  • Institute for Food Safety at Cornell: https://instituteforfoodsafety.cornell.edu/coronavirus-covid-19/

• Just because you think you will not get "that sick" if you catch the virus, remember the goal is to prevent the virus from spreading throughout the community which has vulnerable people in it.
Actively Manage Cleaning and Disinfection in the Workplace and Employee Housing

• Set up regular weekly and daily schedules with assigned responsibility
  • CDC guidance for cleaning homes: https://www.cdc.gov/coronavirus/2019-ncov/community/home/cleaning-disinfection.html
  • OSHA COVID-19 resources, including guidance on preparing workplaces: https://www.osha.gov/SLTC/covid-19/

• Cornell employee housing resources
  • CAWD Worker Housing page (agworkforce.cals.cornell.edu)
  • Cornell Farmworker Program Housing Quality Checklist, includes household visuals to support good communications

• Provide cleaning supplies (cleaning solutions, buckets, mops, brushes, etc.)
  • (CDC list of approved antimicrobial cleaning products: https://www.epa.gov/sites/production/files/2020-03/documents/sars-cov-2-list_03-03-2020.pdf)
  • Review mixing directions, required contact times, and worker safety when handling...
Sick Leave

• What is your sick leave policy?
  • All recommendations call for sick people to stay home! Toughing it out is a great way to turn an individual problem into a workforce disaster.

• Will employees feel financially or otherwise obligated to come to work even if they are sick?

• Instruct sick employees to stay home.

• CDC provides posters in English and Spanish covering symptoms of novel coronavirus.
Governor Cuomo Executive Order – Mandatory work force reductions

• New York State has **not imposed any travel restrictions** and all industries essential to the food supply chain, including grocery stores, gas stations, retail food stores, food processors and related food businesses, etc., are **exempt** from the workforce reduction guidance.

• Farms are definitely exempt as part of the food supply chain.

_NYS Executive Order 202.6_
Governor Cuomo Executive Order – Mandatory work force reductions

• Requires non-essential businesses to implement work-from-home polices effective today, Mar 20, to reduce their in-office workforce by 75%, and a full 100% by the evening of Mar 22.

• **List of New York essential businesses**

• Just because food production is exempt, allied businesses are, and will continue, to work-from-home whenever possible and are taking additional precautions when farm visits are required

[NYS Executive Order 202.6](#)
New Federal Sick Leave & PFL Policies

U.S. House and Senate passed and President signed Families First Coronavirus Response Act. The Act:

• Applies to businesses with <500 employees. Businesses with <50 employees may get exemptions if the Act will make nonviable.
• Will be in effect for the next 1 year.
• Provides 80 hours of sick leave: full pay for sick or quarantined employee, 2/3 pay if caring for another.
• Expands FMLA, up to 12 weeks of job-protected leave to care for the employee's child if the school or other provider is unavailable, at 2/3 pay.
• Employers can take tax credits against the social security tax to cover the benefits provided. If costs exceed SS then the government will send employer a check.
• New York Farm Bureau summary
New York State Sick Leave Policies

- Info from [NYFB summary document](#)
- Two parts: temporary provisions for COVID-19 and a permanent change to the law. Affects all NY employers.

### Temporary Provisions
- Employers of 99 or less must: notify employees, provide job protected leave, and provides docs to apply for PFL and DBL
- PFL and DBL available after sick leave exhausted

<table>
<thead>
<tr>
<th># Employees</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 or fewer</td>
<td>Unpaid sick time during employee's quarantine or isolation</td>
</tr>
<tr>
<td></td>
<td>Employers with &gt;$1 Million net income must provide 5 days paid sick leave</td>
</tr>
<tr>
<td>11 to 99</td>
<td>5 day of paid sick leave</td>
</tr>
<tr>
<td>100 or more</td>
<td>14 days of paid sick leave</td>
</tr>
</tbody>
</table>

### Permanent Provisions
- Effective Jan 1, 2021
- Sick leave accrues 1 hour/30 hours worked

<table>
<thead>
<tr>
<th># Employees</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 or fewer</td>
<td>Must provide up to 40 hours of unpaid sick. Employers with &gt;$1 Million net income must provide 40 hours of paid sick leave</td>
</tr>
<tr>
<td>11 to 99</td>
<td>5 days of paid sick leave</td>
</tr>
<tr>
<td>100 or more</td>
<td>14 days of paid sick leave</td>
</tr>
</tbody>
</table>
Unemployment

• For employees of businesses who lose their job through no fault of their own.
  • May include those who are quarantined or sick or directed not to work because of COVID-19
  • Are not being paid by their employer because the work can't be done remotely
  • If the employer temporarily or permanently closes due to no business

• **New York waived** the normal 7-day waiting period, out of work employees can now apply for benefits immediately
Prevention and Social Distancing
Preventing spread among farm workers

• Be sure employees understand the seriousness of this disease: communicate often and provide Spanish-language information
• Minimize face-to-face meetings to only what is business critical
  • Postpone staff meetings
  • Minimize work shift overlaps
• Industry nutritionists, advisors, consultants, suppliers, and extension personnel are all instituting additional precautions and travel restrictions
• Make use of teleconference and web conferencing services
• Farm Visit Log: record names (and contact info if you do not have it already) of those who visit the farm. Indicate if they entered the facility and/or interacted with farm employees or if they only delivered/picked up items and did not enter the facility or interact with farm employees. This will enable future communication if needed
Milk Hauling

• To ensure regular milk pick-ups, plants are instituting additional safety measures

DFA: "We are adamantly following the Centers for Disease Control and Prevention (CDC) guidelines across our locations to ensure a healthy workforce and have business continuity plans in place to handle a variety of scenarios such as supply chain interruption and workplace shortages to name a few. Additional precautions are being taken while collecting milk at member farms and delivering to processing facilities, including ensuring only essential personnel are visiting farms and processing facilities, and limiting hauler access to essential areas of farms and plants only."
Milk Hauling

• Minimize employee contact with your milk haulers
• Include surfaces handled by the hauler in your additional sanitation procedures
• Make disposable gloves readily available if possible
• Highly trafficked sinks, like the milk house, will run out of soap and towels more frequently, keep them stocked
Farm Deliveries

• Feed and other supply companies, and delivery services are all instituting additional precautions for their employees
• Minimize delivery personnel access to facilities
  • Dedicate a drop off location
  • Waive requirements for signature upon delivery
  • Deliveries could be left outside
    • Temporary drop-off site protected from the weather
    • Protection for items that should not freeze and cooling for items that need to be kept cold
• WHO and CDC have stated that the likelihood of catching the COVID-19 virus by touching cardboard or other shipping containers is low ([WHO COVID-19 FAQ](https://www.who.int/emergencies/diseases/novel-coronavirus-2019))
Dairy Supplies

• Medical supplies
  AmerisourceBergen (MWI): "Our sourcing teams continue to monitor ordering activity and inventory levels and create safeguards on products in high demand to ensure stable availability...In terms of the global pharmaceutical supply chain, we have been notified of a small number of drug shortages due to COVID-19, and all impacted products have therapeutic alternatives available."

• Have contingency plans should specific supplies come into short supply
Sale Barns

• Livestock sale barns remain open and operational
  Empire Livestock Marketing: “As the coronavirus (COVID-19) outbreak continues to spread across the United States, Empire Livestock Marketing will continue to conduct regular sales at all market facilities; however, we have implemented changes to benefit the health and welfare of our customers and employees.”

• Attendance should be limited to registered buyers and employees

• Check your local sale barn for their specific guidance
Semen Delivery & AI Technicians

• Stepped up PPE and personal distancing policies for deliveries and arm service have been instituted
• Communicate semen of product needs prior to their arrival
• Some suggesting advanced semen ordering just in case supply is disrupted in the future (may offer delayed billing for advanced orders)
• Farm personnel trained to AI can fill in as needed
DHIA Services

- Testing and lab services will continue
  DairyOne: "In response to the COVID-19 pandemic, we have implemented a wide range of measures that will minimize risk to our staff and keep our business operating at the highest level possible."

- Field staff are continuing to service farm customers and are taking precautions as noted by the CDC

- Limiting lab access to essential personnel

- Samples should be left in the reception area
Veterinary Services

• Large Animal Veterinarians are included as businesses essential to supply the food chain and exempt from the workforce reduction EO 202.6 falling under Essential Health Care Operations (complete list)

• May need to operate with reduced service and/or support staff due to their own health needs

• Consider postponing non-time critical services

• Remote communication for assistance if practical
AHDC & QMPS

• Veterinary diagnostic laboratory is open
• Quality Milk Production Services continuing farm services with addition safety precautions
  • Refer to your regional lab for specific guidance
• Any future service disruption will be posted on the AHDC website
On Farm Communications

- Group text
- Free three-way calling (Apple & Android phones)
- Free conference call lines (ex. Go To Meeting)
- White boards and other written forms – avoid common markers/pens
- Cloud stored documents that can be updated in real time (Ex. Google Docs)
- Private Facebook Groups, WhatsApp, etc.
What To Do With Suspected or Confirmed COVID-19 Cases
If You Have Reason to Suspect COVID-19

• In NY, your local health department is your community contact for COVID-19 concerns. ([https://www.nysacho.org/directory/](https://www.nysacho.org/directory/))

• CDC: [What to Do If You Are Sick](https://www.cdc.gov/coronavirus/2019-ncov/if-you-have-covid-19.html)
  • Stay home, stay in touch with your doctor, stay away from others

• Remember to communicate health issues on the farm with anyone still coming to the farm
Dealing With Sick Employees

• What if an employee arrives to work sick?
  • CDC recommends to separate sick employees and send home immediately.
  • FisherPhillips law firms advises this is not a violation of the ADA.

• What if the employee lives in farm-provided housing?
  • Consider the possible impact on other employees in the housing.
  • What alternatives exist? How can the employee be isolated? How will the employee receive needed food and care?

• CDC guidance for caring for someone at home
  • Monitor for worsening symptoms
  • Prevent the spread of germs
  • Provide symptom treatment
  • When to end home isolation
Managing in a Disease-altered Business Environment
## Managing with reduced labor force

- Cross training for critical jobs
- Farm chore triage
  - Example

<table>
<thead>
<tr>
<th>Must continue on current schedule and/or capacity</th>
<th>Continue but on a reduced schedule and/or capacity</th>
<th>Discontinue until practical to start again or needs change</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Feed delivery</td>
<td>- Scheduled maintenance*</td>
<td>- Team meetings</td>
</tr>
<tr>
<td>- Milking</td>
<td>- Repro programs?</td>
<td>- Farm tours</td>
</tr>
<tr>
<td>- Manure management</td>
<td>- 3x to 2x Milking?</td>
<td>- Sales visits</td>
</tr>
<tr>
<td>- Hoof Trimming</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*that will not lead to an increase in animal health problems, significant impact on herd performance, or significant damage to equipment or facilities
What if you or key managers become ill or need to self quarantine?

- Follow CDC guidelines
- Rely 100% on remote communications
- Assign temporary management responsibilities to next level employees
- Consider an outside manager who could step in if you were too sick to work or even hospitalized
CDC Recommendations for Supporting Yourself

• Take breaks from watching, reading, or listening to news stories, including social media. Hearing about the pandemic repeatedly can be upsetting.

• Take care of your body. Take deep breaths, stretch, or meditate. Try to eat healthy, well-balanced meals, exercise regularly, get plenty of sleep, and avoid alcohol and drugs.

• Make time to unwind. Try to do some other activities you enjoy.

• Connect with others. Talk with people you trust about your concerns and how you are feeling.

• Call your healthcare provider if stress gets in the way of your daily activities for several days in a row.
Additional Resources

- Cornell University Institute for Food Safety
- New York Extension Disaster Education Network
- NMPF Dairy Farmer Handbook on Coronavirus
- Alltech Resources (https://www.alltech.com/dairy-on-farm-support)
  - What You Need to Know About Coronavirus On Your Dairy: English, Spanish
  - Visitor Screening Form: English, Spanish
Thanks and Take Care

Questions?
Prevención de infección contra el virus COVID-19
para los empleadores y trabajadores agrícolas

Este documento contiene recomendaciones para los empleadores agrícolas sobre cómo actualizar su Programa de Prevención de Lesiones y Enfermedades para incluir la prevención de la propagación del virus COVID-19 en el lugar de trabajo. Debido a que el COVID-19 está muy extendido en la comunidad, la mayoría de los trabajos deben considerar la enfermedad como un riesgo en el lugar de trabajo.

CAPACITACIÓN PARA LOS EMPLEADOS SOBRE EL COVID-19
Los empleadores agrícolas deben proporcionar la capacitación de una manera que todos los empleados puedan entender fácilmente. Los empleados deben recibir capacitación en los siguientes temas:

Información relacionada al COVID-19 de los Centros para el Control y la Prevención de Enfermedades (CDC), incluyendo:

- Lo que es el COVID-19 y la manera en que se propaga.
- Previsión de la propagación del COVID-19 si Ud. está enfermo.
- Los síntomas del COVID -19 y cuando pedir atención médica.

Información de la página web de Recursos sobre el COVID-19 de UMASH, para recursos adicionales, que incluye información en español.

La importancia de lavarse frecuentemente las manos con agua y jabón, incluyendo lo siguiente:

- Seguir las instrucciones del CDC de lavarse las manos por lo menos 20 segundos.
- Cuando los empleados llegan a sus lugares de trabajo y antes de salir del trabajo.
- Antes y después de comer y usar el baño.
- Después de tener contacto cercano con otras personas.
- Después de tener contacto con superficies o herramientas compartidas.
- Antes y después de ponerse mascaras o guantes.
- Después de sonarse la nariz o estornudar.

Información sobre lo siguiente:

- Que el desinfectante de manos no es tan efectivo como lavarse las manos, pero puede ser usado temporalmente si no hay un sitio disponible inmediato para lavarse las manos.
- Evitar tocarse los ojos, nariz y boca.
- Seguir un protocolo al toser y estornudar, que incluya el cubrirse la cara con pañuelos de papel o con la manga en vez de la mano cuando se produzca una tos o un estornudo.

El uso seguro de los productos de limpieza y desinfectantes sobre superficies y objetos, que incluya:

- Seguir cuidadosamente las instrucciones de la etiqueta.
- Evaluar los peligros de todos los limpiadores y desinfectantes utilizados en el lugar de trabajo.
- Usar equipo de protección personal (tal como guantes)
- Asegurarse de que los limpiadores y desinfectantes sean utilizados de una manera que no pongan en peligro a los empleados.

PROCEDIMIENTOS PARA AYUDAR A PREVENIR LA PROPAGACIÓN DEL COVID-19 EN EL TRABAJO:

Los empleadores agrícolas deberían establecer e implementar los siguientes procedimientos para ayudar a prevenir la propagación del COVID-19:

- Recomendar a los trabajadores que usen una cobertura de tela facial para reducir la propagación del COVID-19 entre los trabajadores.
- Inmediatamente mandar a los empleados con síntomas respiratorios agudos a la casa o a un centro médico, cuando sea necesario.
- Aconsejar a los trabajadores enfermos o positivos con el COVID-19 que limiten el contacto con los animales. Establecer protocolos para ayudar a cubrir el manejo de animales y los turnos.
- Establecer procedimientos para notificar a las autoridades locales de salud sobre las infecciones del COVID-19.
- Animar a los trabajadores enfermos, que de otro modo podrían trabajar por necesidad económica, a quedarse en casa sin castigarlos por faltar al trabajo.
- Si los síntomas, o enfermedad o el cuidado de un familiar enfermo les impide trabajar. Ver: MNOSHA COMPLIANCE: NOVEL CORONAVIRUS (COVID-19)
- Haga que las estaciones para el lavado de manos sean más fácilmente disponibles y anime su uso.
Establecer procedimientos para limpiar y desinfectar rutinariamente las superficies y los objetos comúnmente tocados (por ejemplo, recipientes de agua, volantes, herramientas compartidas, estaciones de trabajo compartidas, manijas de puertas, cinturones de seguridad, dentro de los baños) durante toda la jornada laboral. Estos procedimientos deben incluir:

- Uso de productos aprobados por la EPA para el uso contra el virus que causa el COVID-19.
- Proporcionar toallitas/servilletas desechables registradas por la EPA para que los empleados limpien las superficies de uso común antes de su uso.
- Seguir las instrucciones del fabricante para todos los productos de limpieza y desinfección (por ejemplo, requisitos de seguridad, equipo de protección, concentración, tiempo de contacto).
- Asegurarse de que haya suficientes productos para mantener prácticas de desinfección y limpieza.

PROCEDIMIENTOS PARA AUMENTAR EL DISTANCIAMIENTO FÍSICO EN LOS RANCHOS:
El distanciamiento físico es una medida preventiva para controlar la infección y que puede detener o retrasar la propagación de una enfermedad infecciosa al limitar el contacto entre las personas. El distanciamiento físico seguro significa mantener una distancia de al menos seis pies con otras personas. Los empleadores agrícolas deben utilizar las siguientes medidas de distanciamiento físico para detener o frenar la propagación del COVID-19.

- Se debe practicar el distanciamiento físico, ya sea al aire libre, en vehículos o en estructuras.
- Establecer prácticas laborales y estaciones de trabajo, y ajustar la velocidad en las filas de trabajo y otros procesos para permitir a los empleados mantener un distanciamiento físico seguro mientras trabajan.
- Escalaron, o sea espaciar, los períodos de descanso y de almuerzo.
- Limitar el tamaño de la cuadrilla de empleados al espaciar los turnos de trabajo o al aumentar el número de los turnos de trabajo.
- Proporcionar asientos adicionales y estructuras con sombra para permitir que los empleados tomen descansos mientras se mantienen al menos seis pies de distancia.
- Animar a los empleados a evitar grandes reuniones y practicar el distanciamiento físico durante las horas no laborales. Se recomienda a los empleadores que den vivienda a sus trabajadores y ser proactivos en asegurar que el distanciamiento físico sea posible para aquellos que exhiben y para los que no exhiben síntomas.
- Establecer procedimientos en torno a los horarios y lugares para recoger y recibir entregas, para minimizar el movimiento de vehículos dentro y fuera de la granja y la cantidad de interacciones entre las personas.

OTRAS BUENAS PRÁCTICAS GENERALES SANITARIAS:
Los empleadores agrícolas deben asegurarse de que todos los empleados puedan tener acceso a los baños y a las instalaciones para el lavado de manos en todo momento:

- Los baños deben estar limpios e higiénicos.
- Las instalaciones para el lavado de manos deben estar junto o cerca de los baños.
- Se tiene que proporcionar jabón u otro producto de limpieza adecuado y toallas de un solo uso.
- Los productos adicionales de lavado de manos deben colocarse lo más cerca posible de las áreas de trabajo para permitir el lavado de manos frecuentemente.
- Se tiene que permitir tiempo suficiente para lavarse las manos con frecuencia.
- Debe realizarse el lavado de manos, el empleador debe revisar con frecuencia la cantidad de jabón, toallas de papel y papel higiénico, y reponerlos de nuevo antes de que se acaben.
- Continuar las prácticas seguras del manejo de animales. Los trabajadores enfermos deben limitar su interacción con los animales.

Los respiradores deben usarse y estar disponibles cuando sea necesario para proteger a los trabajadores de los peligros, tales como ciertos pesticidas, polvos y solventes.

Los trabajadores deben ser entrenados y tener una prueba de ajuste para usar respiradores, deben aprender a verificar la integridad estructural y funcional de los respiradores y saber si se puede mantener el sellado antes de usarlos.

Para más información sobre el uso del respirador y el COVID-19 visite UMASH Respiratory toolkit.

- Página de recursos de UMASH COVID-19
  http://umash.umn.edu/covid-19-resources
- Consejo de Minnesota sobre Salud Ambiental (MN Board of Animal Health)
  https://www.bah.state.mn.us/covid-19
- Departamento de Agricultura de Minnesota (Minnesota Department of Agriculture - MDA)
  https://www.mda.state.mn.us/covid-19-agriculture
- Agencia de Protección Ambiental de los Estados Unidos (US Environmental Protection Agency- US EPA)
COVID-19 Infection Prevention for Agricultural Employers and Employees

This document contains recommendations for agricultural employers on how to update their Injury and Illness Prevention Program to include preventing the spread of COVID-19 in the workplace. Because COVID-19 is widespread in the community, most workplaces must consider the disease a workplace hazard.

EMPLOYEE TRAINING ON COVID-19
Agricultural employers should provide training in a way that is readily understandable by all employees. Employees should be trained on the following topics:

- The importance of not coming to work if they have a dry cough, fever, or difficulty breathing, or if they live with or have had close contact with someone who has COVID-19.
- The employer’s plan and procedures to protect employees from COVID-19 illness.
- Recommend workers to wear face cloth coverings to reduce the spread of COVID-19 among workers.
- Immediately send employees with acute respiratory illness symptoms home or to medical care as needed.
- Advise sick or COVID-19 positive workers to limit contact with animals. Establish protocols to help cover animal handling and care shifts.
- Establish procedures to notify local health officials of COVID-19 infections.
- Encourage sick workers, who might otherwise work out of economic necessity, to stay home by not punishing them for missing work.

Learn more at: MNOSHA COMPLIANCE: NOVEL CORONAVIRUS (COVID-19)

Make hand-washing stations more readily available and encourage their use.

Information related to COVID-19 from the
Centers for Disease Control and Prevention (CDC), including:

- What COVID-19 is and how it is spread.
- Preventing the spread of COVID-19 if you are sick.
- Symptoms of COVID-19 and when to seek medical attention.

Information from the UMASH COVID-19 Resource Webpage for additional resources, including ones in Spanish.

The importance of frequent hand-washing with soap and water, including:

- Following CDC guidelines to wash for at least 20 seconds.
- When employees arrive at work and before they leave work.
- Before and after eating or using the toilet.
- After close interaction with other persons.
- After contacting shared surfaces or tools.
- Before and after wearing masks or gloves.
- After blowing your nose or sneezing.

Information from the following:

- Hand sanitizer is not as effective as handwashing but can be used if a hand-washing station is not immediately available.
- Avoid touching eyes, nose, and mouth.
- Coughing and sneezing etiquette, including covering a cough or sneeze with a tissue or a sleeve instead of a hand.

Safely using cleaners and disinfectants on surfaces and objects, which includes:

- Carefully following label directions.
- Assessing the hazards of all cleaners and disinfectants used at the worksite.
- Wearing personal protective equipment (such as gloves).
- Ensuring cleaners and disinfectants are used in a manner that does not endanger employees.
Establish procedures to routinely clean and disinfect commonly touched surfaces and objects (e.g., water containers, steering wheels, shared tools, shared work stations, door handles, seat belts, insides of toilet facilities) throughout the workday. These procedures should include:

◆ Using products that are EPA-approved for use against the virus that causes COVID-19.
◆ Providing EPA-registered disposable wipes for employees to wipe down commonly used surfaces before use.
◆ Following the manufacturer’s instructions for all cleaning and disinfection products (e.g., safety requirements, protective equipment, concentration, contact time).
◆ Ensuring there are adequate supplies to support cleaning and disinfection practices.

PROcedures to increase social distancing on farms:

Social distancing is an infection control measure that can stop or slow down the spread of an infectious disease by limiting contact between people. Safe social distancing means maintaining a distance of at least six feet from other people. Agricultural employers should use the following social distancing measures to stop or slow down the spread of COVID-19:

◆ Social distancing should be practiced, whether outdoors, in vehicles, or in structures.
◆ Establish work practices and work stations, and adjust line speed and other processes to enable employees to maintain safe social distancing while working.
◆ Stagger break and lunch times.
◆ Limit crew size by staggering work shifts or increasing the number of work shifts.
◆ Provide additional seating and shade structures to allow employees to take breaks while staying at least six feet apart.
◆ Encourage employees to avoid large gatherings and practice social distancing during non-work hours. Employers who house workers are encouraged to be proactive in making social distancing possible for those exhibiting and not exhibiting symptoms.
◆ Establish procedures around pick-up and drop-off times or locations to minimize the movement of vehicles on and off the farm and the number of interactions between individuals.

OTHER general good sanitation practices:

Agricultural employers must ensure bathrooms and hand-washing facilities are readily accessible to all employees at all times:

◆ Restrooms must be clean and sanitary.
◆ Hand-washing facilities must be located at or near the restrooms.
◆ Soap or other suitable cleansing agent and single-use towels must be provided.
◆ Additional hand-washing supplies should be placed as close to work areas as possible to allow for frequent hand-washing.
◆ Enough time must be allowed for frequent hand-washing.
◆ Due to increased hand-washing, the employer should frequently check the supply of soap, paper towels, and toilet paper, and replenish them before they run out.

For further information on respirator use and COVID-19 visit UMASH Respiratory toolkit.

Respirators should be used and made available when required to protect workers from hazards such as with certain pesticides, dusts and solvents.

Workers should be trained and fit tested to use respirators, how to check for structural and functional integrity, and if a successful seal can be maintained before use.

ADDITIONAL COVID-19 resources for agricultural employers:

◆ UMASH COVID-19 resource page
  http://umash.umn.edu/covid-19-resources
◆ Minnesota Board of Animal Health
  https://www.bah.state.mn.us/covid-19
◆ Minnesota Department of Agriculture
  https://www.mda.state.mn.us/covid-19-agriculture
Supporting Dairy Workers: 
Housing and Workplace Best Practices 
(COVID-19) 
2020
## Table of Contents

1. Purpose  
1.1 Plan and Be Prepared  
1.1.1 Develop plan & best practices  
1.1.2 Housing workers with symptoms of COVID-19  
1.1.3 Accessing healthcare and health departments  
1.2 Promote Healthy Habits  
1.2.1 Communication measures  
1.2.2 Prevention  
1.2.3 Education: Hygiene and Hand Washing  
1.2.4 Provide supplies  
1.3 Preventing the Spread of COVID-19  
1.3.1 Screening procedures for incoming workers  
1.3.2 Worker exhibiting symptoms of COVID-19  
1.3.3 Isolation measures  
1.3.4 Handling a COVID-19 diagnosis  
1.3.5 Housing  
1.3.6 Transportation  
1.3.7 Cleaning and Disinfecting  

2. Resources  

2.1 Contact Information  
2.1.1 Department of Workforce Development – Migrant Seasonal Farmworker Services (MSFW):  
2.1.2 Retaliation  
2.1.3 Wisconsin Farmworkers Coalition Members
1. **Purpose:** Recommend best practices/guidance on Housing and workplace safety.

Farming is an essential business operation and activity. Wisconsin agricultural workers and operators generate necessary food supplies for the State of Wisconsin and our nation. COVID-19 can spread easily in settings with many people in close proximity including living and workplace facilities for dairy farmworkers. Farm owners, managers, and farm labor contractors who provide employment and housing for workers should proactively implement plans to prevent exposure to the virus that causes COVID-19, care for individuals with COVID-19, and prevent the spread of the disease. Strict compliance to strong sanitary protocols and physical distancing practices will protect the health and safety of farmworkers and decrease operational impacts.

Farmworkers are particularly susceptible to getting and spreading COVID-19 due to workplace and living conditions. Additionally, individuals above the age of 65 and people with pre-existing medical conditions such as diabetes, chronic lung disease and chronic heart disease, or a compromised immune system (e.g., cancer, cancer treatment, or other immunosuppressant treatments) have a greater risk of severe illness from COVID-19. Agricultural workers with lung problems associated with exposure to common hazards such as pesticides used in agricultural operations, are also at special risk.

If followed, the recommendations from the WI Farmworker Coalition will minimize dairy farmworker exposure to COVID-19 and protect public health of the state.

The key components of a prevention plan for migrant farm workers include:

1) Proactively identifying the health risks faced by farmworkers and developing action steps to minimize the risk of exposure and spread of the virus,

2) Worker education to ensure understanding of best practices to reduce risk of transmission

3) Early detection and isolation of people with symptoms of COVID-19, and

4) Caring for individuals with COVID-19 to ensure that they do not spread the illness to others.
1.1 Plan and be Prepared

Develop Plans and Best Practices

- Establish communication with local health departments. Identify who at the local health department will be your primary contact for COVID-19 concerns. Ask what resources your local health department may have available to support isolation and quarantine in the event that you would need additional space for this.
- Develop plan for alternate housing to comply with isolation and quarantine requirements.
- Communicate with your state housing inspector in order to request and arrange for advance inspection of any alternative housing.
- Develop plan to disinfect high-touch areas within the common area and facilities daily per CDC guidance: Plan for cleaning and disinfecting of work areas, common areas, and all bathrooms (workplace and housing).
- Develop plan for a COVID-19 screening process for employees upon arrival to worksite and any employer-provided housing.
- Develop plan to allow employees to isolate in employer-provided housing and recuperate if they have symptoms of COVID-19.
- Communicate an employer’s COVID-19 prevention and care plan to workers at time of recruitment or hire, in a way that is readily understandable by all workers.
- Develop workplace plan for increased absenteeism. Disclose contingency plans to workers at the time of recruitment or hire. Workplace contingency plans may include staggering work shifts, cross-training employees or hiring temporary workers.
- Do not dock pay from employees who call-in sick or do not work due to exhibiting COVID-19 symptoms.

Housing workers with symptoms of COVID-19

- Workers exhibiting symptoms of COVID-19 (e.g., fever, cough, shortness of breath) should be provided a separate, isolated living space away from other workers.
- Ensure proper ventilation of rooms where persons with COVID-19 are housed.
Accessing healthcare and health departments

- Identify who at the local health department will be your primary contact for COVID-19 concerns. Discuss and establish reporting procedures with local health departments.
- Identify a list of healthcare facilities and healthcare providers near dairy farm and any employer-provided housing. It is important to find out if the local clinic has COVID-19 testing capacity and how patients can access tests (i.e., What is the cost if worker is uninsured, what are the requirements for accessing financial support programs offered through the facility and other options available).
  - To view a list and map of healthcare facilities - Wisconsin Association of Free & Charitable Clinics: http://www.wafcclinics.org/find-a-clinic.html
  - or WI Community Health Centers: https://www.wphca.org/page/FindHealthCenter
  - If you cannot find a free or low-cost facility in your area, contact your local health department for advice https://www.dhs.wisconsin.gov/lh-depts/counties.htm
- Communicate with identified healthcare provider(s) and/or facilities in order to identify and resolve any obstacles to worker treatment in advance of need.
- Provide health insurance to your employees and encourage your employees to sign-up for such insurance. Assist workers in applying for BadgerCare Plus medical insurance, if eligible. https://access.wisconsin.gov/access/ Additional information is also available: https://www.dhs.wisconsin.gov/publications/p1/p10179.pdf
- Offer paid sick time leave so that employees feel empowered to report experiencing COVID 19 symptoms and can seek medical attention. (Related: many employers may be subject to the Families First Coronavirus Response Act, which requires certain employers to provide 80 hrs of paid sick leave to employees with COVID-19 symptoms)
1.2 Promote Healthy Habits

Communication measures

- Communicate all information in the language a worker understands.
- Inform workers about the steps being taken in the workplace and employer-provided housing to establish social distancing and prevent the spread of the virus.
- Communicate to workers important safety messages and updates daily.
- Seek input from workers regarding additional measures that could be taken to ensure safety in workplace and employer-provided housing.
- Ensure workers will not face retaliation for making suggestions on health and safety or reporting unsafe work or housing conditions. Provide training to supervisors to prevent retaliation.
  
  o It is against the law for any employer to take any adverse action such as firing or threatening a worker for exercising safety and health rights such as raising safety and health concerns to their employer, participating in union activities concerning safety and health matters, filing a safety and health complaint or participating in an OSHA investigation. Workers have 30 days from the date of any such discriminatory action by the employer to file their complaint with OSHA.

- Visibly post anti-retaliation protections and phone numbers workers can use call to report retaliation: OSHA [https://www.osha.gov/workers/file_complaint.html](https://www.osha.gov/workers/file_complaint.html)

Prevention

- Promote preventative actions: use health messaging and materials developed by credible public health services, distributed in a language and format all employees will understand.
- Provide training on handwashing, social distancing, and identifying COVID-19 symptoms.
- Visibly post educational signage to encourage handwashing, social distancing, and awareness of COVID-19 symptoms in workplace and housing.
- Provide prevention supplies free of charge at your workplace and/or housing site: soap or alcohol-based hand sanitizers that contain at least 60% alcohol, tissues, trash baskets and surgical or cloth face coverings. Plan to have extra supplies on hand.
- Promote the use of cloth face coverings in all settings where physical distancing measures are difficult to maintain.
- Consider installing physical barriers between workers to minimize contact for those who must work in close proximity for extended periods of time.
➤ Develop plan for washing and drying cloth face coverings after each use, per CDC guidelines.
➤ Increase the number of washers and dryers available in employer-provided housing units, in order to allow the more frequent laundering of cloth face coverings. Do not charge workers to use washers and dryers.
➤ Ensure supervisors lead by example.

Education: Hygiene & Handwashing
➤ Conspicuously display DHS or CDC hand hygiene signs in English and in the language of workers, if other than English.
➤ Conspicuously display DHS or CDC on protecting oneself and others from COVID-19 in workplace and employer-provided housing in English and in the language of workers, if other than English.
➤ Provide information about social distancing in English and in the language of workers, if other than English.
➤ Employees should avoid sharing personal items with coworkers (i.e., food, dishes, cups, gloves, engaging in activities such as playing cards, etc.)
➤ Employees should sneeze or cough into tissues (and immediately discard the tissue) or their shoulder or elbows. They should wash their hands afterwards.
➤ Keep a minimum distance of six (6) feet from other coworkers (or any CDC updated social distancing protocol), including in workplace, during mealtimes, while in transportation provided by the employer, etc.
➤ Encourage employees to wash/sanitize their hands multiple times daily, including before and after work, breaks, eating, and use of toilet facilities.
➤ Place hand washing stations or hand sanitizer with at least 60% alcohol in cooking and eating facilities and in workplaces. Allow workers to use handwashing stations or hand sanitizer as frequently as desired.
   o Follow CDC guidelines for personal hygiene, including using an alcohol-based sanitizer that contains at least 60% alcohol or washing their hands with soap and water for at least 20 seconds.
   o Have soap and disinfectant, potable water, and single-use disposable towels available at worksites and at employer-provided housing.
➤ Reduce meetings and group gatherings to essential communication only and limit such meetings. If group meetings must occur, hold outside or in a space where people can observe social distancing of at least six (6) feet.
➤ Limit personal contact and grouping within employer-provided housing and worksites and limit the number of people using common facilities at any one time.
➤ The CDC has educational materials available in both English and Spanish: https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html
The WI Dept of Health Services has information posters in English, Spanish, Hmong & Chinese Mandarin:
https://www.dhs.wisconsin.gov/library/p-02592.htm and
https://www.dhs.wisconsin.gov/covid-19/resources.htm

Provide supplies
- Provide access to cleaning supplies free of charge and support workers in maintaining a clean and disinfected environment through training, signage, and providing increased time to clean and disinfect work spaces and shared common housing spaces.
- Provide free of charge a disinfectant that is active against coronaviruses.
  https://www.epa.gov/pesticide-registration/list-n-disinfectants-useagainst-sars-cov-2
  Provide training on how to safely use disinfectants.

1.3 Preventing the Spread of COVID-19

Screening procedures for incoming workers
- Employees (including supervisors) that are sick, have symptoms related to COVID-19, or have a family member sick should be required to stay home and recuperate. Provide paid sick time to empower workers to take off time if they are ill. If the Families First Coronavirus Response Act applies to your farm or company, educate workers on their rights to paid sick leave provided by the Act.
- Apply screening procedures prior to employees entering the facility daily:
  Measure employee's temperature (fever is 100.4 °F [38 °C] or higher) and/or specifically ask if they have experienced a fever, cough or difficulty breathing. For specifics, please refer to CDC guidelines, found here:
- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify supervisor, not enter the worksite, and should be isolated from other workers in both the workplace, and in employer-provided housing.
- Ask employees if they have traveled in the last 14 days or been in contact with someone who has been diagnosed with COVID-19. If so, separate them from other workers and support them in isolating at home or in employer-provided housing.
WI Department of Health link to screening tool:
https://www.wihealthconnect.com/

Employers should not terminate employment of employees who are sick with or have been exposed to COVID-19.

**Workers exhibiting symptoms of COVID-19**

- People with symptoms of COVID-19 should not be working.
- Workers exhibiting symptoms should be provided a mask and asked to wear it when leaving the workplace to assist with source control. Masks should be provided to any caregivers of ill workers.
- Supervisors should notify management and follow established plan to notify the local health department.
- Arrange for sick workers to see or speak with a medical provider. Assist workers in communicating with the medical provider. Communicate with the medical provider in advance of any worker arriving to medical facility so healthcare workers can take appropriate precautionary measures.
- Employers should ensure that workers exhibiting symptoms of COVID-19 are transported separately to their residences and other transportation provided by the employer is also separate from other workers not exhibiting symptoms. Workers with symptoms of COVID-19 should take a private vehicle to get to the medical provider. If they do not have their own vehicle or are too ill to drive, please assist with transportation. Have the patient sit as far away as possible from the driver and both the patient and driver should wear a mask.
- All surfaces the sick worker came in contact with should be cleaned and disinfected.
- Notify all employees when a coworker exhibits symptoms of COVID-19. Disclose to employees when a worker tests positive for COVID-19. Employers do not need to name sick or positive employees, but should alert all workers so that coworkers can take precautionary measures and seek testing.
- Workers at the workplace and employer-provided housing who were in close contact with sick or COVID-19 positive worker should also be considered exposed and should be quarantined for 14 days.
  - WI Dept of Health has guidance for those who have been in close contact with someone with COVID-19: https://www.dhs.wisconsin.gov/library/p-02598a.htm
- Sick employees should not return to work until the criteria to discontinue home isolation are met in consultation with healthcare providers and local health departments:
Non-test-based strategy:
- At least 10 days since symptoms first appeared and
- At least 24 hours with no fever without fever-reducing medication and
- Other symptoms of COVID-19 are improving (Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation.)

Isolation measures
- Workers exhibiting symptoms of COVID-19 should be provided a separate, isolated living space, unless the symptomatic worker resides in a one-family housing unit. If an employer providing housing is unable to effectively isolate worker within their current living space, workers with COVID-19 symptoms shall be isolated in a separate room or building from other workers.
- Food and water should be provided to workers under isolation in order to minimize the need to leave isolation. Workers may not have any funds to buy their own food and may not have access to kitchens to prepare their own food while sick.
  - Resources: Contact local food pantry to inquire about deliveries of emergency food supplies.
- A worker exhibiting symptoms of COVID-19 should be immediately be assigned to a separate toilet room, if possible, or a separate toilet if a separate toilet room is not available.
- Provide paid sick time to empower workers to take off time if they are ill. If the Families First Coronavirus Response Act applies to your farm or company, educate workers on their rights to paid sick leave provided by the Act.
- Monitor worker for worsening symptoms, as people who develop symptoms may become sicker and require hospitalization. Assign a designated caregiver for each sick worker who will be on call and easily contactable. Provide workers with phone number(s) for the emergency contact person on call to assist them if symptoms worsen.
- Remain in communication with local public health officials. Public health officials may provide further instructions about isolation and release from isolation.
- Create a plan for how to care for workers, especially if many workers are sick at the same time. Also develop workplace contingency plans for periods of reduced labor.
- Review CDC Guidance for Agricultural Employers, Homeless Shelters and/or Universities for guidance on preventing/managing an outbreak in congregate living settings.
Handling a COVID-19 positive diagnosis:


- Instruct workers who had contact with the COVID-19 positive person to self-monitor for symptoms of COVID-19 for 14 days. These exposed workers should be separated from non-exposed workers for 14 days (e.g., sleep in a separate room, work in a separate area). If they develop symptoms of COVID-19, follow your established procedure for isolation and care. Guidelines on what to do if someone has been in close contact with a COVID-19 positive person are available from WI Dept of Health Services [https://www.dhs.wisconsin.gov/library/p02598a.htm](https://www.dhs.wisconsin.gov/library/p02598a.htm)

- Information on what to do if you live with someone diagnosed with COVID-19 are available from WI Dept of Health Services [https://www.dhs.wisconsin.gov/library/p-02598.htm](https://www.dhs.wisconsin.gov/library/p-02598.htm)

- Provide separate sleeping quarters and bathroom for each individual with COVID-19. Clean and disinfect sleeping quarters and bathroom daily. Consider establishing designated times for showering for persons in isolation and establish a disinfection protocol to avoid exposure risk.

- If an individual sharing a bathroom becomes symptomatic of COVID-19, all others sharing a bathroom should be considered exposed.

- Cleaning and disinfecting supplies should be provided free of charge.

- Food and water should be provided to workers under isolation. Also plan to provide worker with any necessary medication.

- Do doing laundry for sick employee.

- Employers should not terminate employment of workers who are sick with or have been exposed to COVID-19.

- Develop plan for contacting the employee's family and identify a method to stay in contact with them virtually.

Employer-Provided Housing:

- Separate beds by at least six (6) feet apart to comply with the social distancing. Workers should also sleep head to toe.

Immediately separate any individuals with symptoms of COVID-19. Individuals with COVID-19 symptoms should be isolated and have their meals brought to them to eat separately in their isolation quarters.

Increase number of meal shifts to decrease number of people eating in same space at one time. Clean and disinfect dining space after each meal shift.

Be diligent in following hygiene and food safety rules about keeping food covered and not sharing utensils or containers, washing hands before eating and handling shared object and cleaning kitchen and dining areas between use.

Encourage employees to follow social distancing practices in common areas.

**Employer-Provided Transportation:**

Employers should ensure that workers engage in social distancing on all transportation between work and their residences and other transportation provided by the employer. Workers should sit six (6) feet apart, even if this requires additional transport or reduces productivity. Employer may stagger start times or workdays.

If the employer is unable to meet the six-feet distancing on transportation, it should provide sanitized face masks or cloth face coverings and require all vehicle occupants to wear face masks or cloth face coverings during transport.

Hand sanitizer with at least 60% alcohol should be available in all transport vehicles.

All high touch surfaces in vehicles should be cleaned and disinfected at least once per day.

Reduce the number of workers transported at a time

**Cleaning & Disinfecting:**

Train workers on the difference between cleaning and disinfecting.

Train workers to safely use chemical disinfectants.

Increase the frequency of your routine cleaning and disinfection program.

Emphasize the importance of cleaning and disinfecting frequently touched objects and surfaces: bathrooms, water coolers, faucet handles, door knobs, light switches, countertops, equipment, phones, etc.

Use Environment Protection Agency (EPA) registered disinfectant to clean and disinfect. [https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2](https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2)
2. Resources

- CDC Poster/Print Resources: https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html
- WI Dept of Public Health Coronavirus Website: https://www.dhs.wisconsin.gov/covid-19/index.htm
- Wisconsin Health Connect on behalf of Dept of Health Services - Screening for COVID-19: https://www.wihealthconnect.com/
- WI Dept of Health Services (DHS) What should I do if someone in my home is sick from COVID-19: https://www.dhs.wisconsin.gov/library/p-02598.htm
- WI Dept of Health Services (DHS) What should I do if I had close contact with someone who has COVID-19: https://www.dhs.wisconsin.gov/library/p-02598a.htm
- Western Center for Agricultural Health & Safety: https://aghealth.ucdavis.edu/covid19#resources
› Oregon – COVID-19 Guidance for Shelter Settings (appropriate for congregate living/barracks):
› WA State Dept of Health: Workplace and Employer Resources & Recommendations:
   https://www.doh.wa.gov/Coronavirus/Workplace
› EPA List N: Disinfectants for Use Against SARS-CoV-2:
› NC DHS COVID-19 Videos in English & Spanish:
   https://www.youtube.com/playlist?list=PLUadR7S9ykdIO5IW3yCJ8IBUGZ3c6gY
› CA OSHA COVID-19 Infection Prevention for Agricultural Employers and Employees:
❑ DWD Employment & Training COVID-19 and Job Center Services:
   https://dwd.wisconsin.gov/covid19/public/det.htm
› Iowa State Extension: Five Steps to Formulate Workforce Contingency Plans in COVID-19 Setting:
   https://www.extension.iastate.edu/agdm/wholefarm/pdf/c1-84.pdf
Contact Information:

Department of Workforce Development – Migrant Seasonal Farmworker Services (MSFW):

Migrant inspector (State of WI - Migrant Labor Law: Migrant housing, field sanitation standards, work agreements)
Pedro Albiter
Ph: (608) 242-4905
Email: Pedro.Albiter@dwd.wisconsin.gov

Foreign Labor (H2A) Coordinator (US DOL - Foreign Labor Certification Program)
Rosa Ortega
Ph: (920) 948-4708
Email: Rosa.Ortega@dwd.wisconsin.gov

State Monitor Advocate
Angelica Vasquez
Ph: (608) 206-0487
Email: Angelica.Vasquez@dwd.wisconsin.gov

Retaliation:

OSHA – Whistleblower Protection Law
Ph: (414) 297-3315

Department of Workforce Development – Bureau of Labor Standards
Ph: (608) 266-3131

US Department of Labor
Ph: (866) 487-2365
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.
EMPLOYEE RIGHTS
PAID SICK LEAVE AND EXPANDED FAMILY AND MEDICAL LEAVE
UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1, 2020 through December 31, 2020.

▶ PAID LEAVE ENTITLEMENTS
Generally, employers covered under the Act must provide employees:

Up to two weeks (80 hours, or a part-time employee’s two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to $511 daily and $5,110 total;
- 2/3 for qualifying reasons #4 and 6 below, up to $200 daily and $2,000 total; and
- Up to 12 weeks of paid sick leave and expanded family and medical leave paid at 2/3 for qualifying reason #5 below for up to $200 daily and $12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

▶ ELIGIBLE EMPLOYEES
In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons (see below). Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.

▶ QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19
An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee:

| 1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19; | 5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or |
| 2. has been advised by a health care provider to self-quarantine related to COVID-19; | 6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services. |
| 3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis; | |
| 4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2); | |

▶ ENFORCEMENT
The U.S. Department of Labor’s Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.
La Ley Familias Primero de Respuesta al Coronavirus (FFCRA o Ley) requiere que ciertos empleadores den a empleados licencias laboral pagadas o expansión de licencia familiar y por enfermedad por razones relativas al COVID-19. Estas provisiones aplicarán desde abril 1 hasta diciembre 31 del 2020.

DERECHOS A LICENCIA LABORAL PAGADA
En general, los empleadores cubiertos bajo la Ley deben proveer a empleados:
Hasta 2 semanas (80 horas, o el equivalente de dos semanas de un empleado a tiempo parcial) de licencia por enfermedad pagada en base a su mayor tasa regular de pago, o el salario mínimo estatal o federal aplicable, de la siguiente manera:
- 100% para razones calificables #1-3 (ver abajo), hasta $511 por día y $5,110 total;
- 2/3 para razones calificables #4 and 6, hasta $200 por día y $2,000 total; y
- Hasta 12 semanas de licencia por enfermedad pagada y expansión de licencia familiar y por enfermedad pagada a 2/3 para razones calificables #5 de hasta $200 por día y $12,000 total.

Un empleado a tiempo parcial es elegible a licencia por las horas que trabajaria durante ese periodo.

EMPLEADOS ELEGIBLES
En general, empleados de empleadores del sector privado con menos de 500 trabajadores, y de ciertos empleadores del sector público, son elegibles a hasta dos semanas de licencia pagada total o parcialmente por enfermedad por razones de COVID-19 (ver abajo). Empleados que hayan estado en nómina al menos 30 días anteriores a su solicitud de licencia podrán ser elegibles a hasta 10 semanas adicionales de expansión pagada parcialmente de licencia familiar y por enfermedad por razón #5.

RAZONES CALIFICABLES A LICENCIA RELACIONADA A COVID-19
Un empleado tiene derecho a tomar licencia laboral relacionada a COVID-19 si no le es posible trabajar, incluyendo imposibilidad de hacer teletrabajo, porque el empleado:

1. está sujeto a orden de cuarentena o aislamiento Federal, Estatal, o local relacionada al COVID-19;
2. ha sido instruido por un proveedor de salud que se ponga en auto-cuarentena por COVID-19;
3. está experimentando síntomas de COVID-19 y está solicitando diagnóstico médico;
4. está cuidando a una persona sujeta a una orden descrita en (1) o en auto-cuarentena descrita en (2);
5. está cuidando a un hijo cuya escuela o lugar de cuidados está cerrado (o cuidados infantiles no están disponibles) por razones de COVID-19; o
6. está experimentando otras condiciones sustancialmente similares a las especificadas por el Secretario de Salud y Servicios Humanos.

CUMPLIMIENTO
La División de Horas y Salarios (WHD) del Departamento de Trabajo de EE.UU. tiene la autoridad de investigar y hacer que se cumpla la FFCRA. Los empleadores no podrán expulsar, disciplinar, o discriminar de ningún modo a un empleado que legalmente hace uso de su derecho a licencia laboral pagada o a extensión de licencia familiar y por enfermedad bajo FFCRA, presenta una queja, o inicia un procedimiento bajo o relativo a esta Ley. Los empleadores que violen las provisiones de la FFCRA serán objeto de multas y medidas de cumplimiento por la WHD.

Para información adicional o para presentar una queja:
1-866-487-9243
TTY: 1-877-889-5627
dol.gov/agencies/whd
Pre-Arrival Site Visit and Workplace Modifications

**Work Environment:**

Introduction  
We would like to work with you to help keep your workforce health and to help both you and the workers have a healthy and successful season. We are not here to enforce any orders and the recommendations that we give are what we feel would reduce the risk of COVID spread. We understand that some changes may be challenging to implement and want to come up with the best steps that will be both helpful and feasible.

1. What modifications have you already made to reduce the risk of COVID within your facility?

2. Have you identified areas that you feel are high risk?

3. What obstacles have you encountered in making any modifications that you would like to implement?

4. Create a plan for screening workers for COVID 19 symptoms when they arrive at work
   - Establish reasons for sending someone home (e.g. those with one, two, or three of the primary symptoms.
   - Identify who will be responsible for screening workers
   - Send workers home who exhibit COVID-19 symptoms or any other company-specific criteria

5. Clearly communicate your plan and the symptoms you will be screening for to workers
   - Inform workers that they must stay home if they are suffering from these symptoms
   - Ask workers to inform their supervisor immediately if they begin to feel symptoms while at work

6. Observe workers for symptoms as they arrive to work and throughout the day in the event symptoms emerge

7. Send workers who have symptoms home and advise them to call Family Health la Clinica

<table>
<thead>
<tr>
<th>Physical Plant/Environmental Controls</th>
<th>Assessed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walk the entire work site/plan with someone knowledgeable on how the facility runs.</td>
<td></td>
</tr>
</tbody>
</table>
## Pre-Arrival Site Visit and Workplace Modifications

<table>
<thead>
<tr>
<th>Social Distance</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Mark wall or floor every six feet with stickers or paint and stencils to help promote awareness of 6 feet distance and promote social distancing.</td>
<td></td>
</tr>
<tr>
<td>Advise workers to avoid social greetings such as handshakes, hugs, and fist or elbow bumps; encourage waves and smiles</td>
<td></td>
</tr>
<tr>
<td>Hold meetings and trainings in small groups so workers can maintain 6 feet of distance between each other and still hear the speaker.</td>
<td></td>
</tr>
<tr>
<td>When in fields, orchards, vineyards, or packing houses, each worker should maintain a minimum of 6 feet from each other at all times. Stagger workers over and within rows, adjust product flow for adequate inspection or sorting with fewer workers on the line.</td>
<td></td>
</tr>
</tbody>
</table>

### Areas of Congestion

<table>
<thead>
<tr>
<th>Are there bottlenecks?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>examples</td>
<td>Arrival into facility</td>
</tr>
<tr>
<td>Time Clocks</td>
<td>Handwashing Stations</td>
</tr>
<tr>
<td>Changing Areas</td>
<td>Temperature Checks</td>
</tr>
<tr>
<td>What solutions are there to reduce congestion?</td>
<td></td>
</tr>
</tbody>
</table>

### Masks

<table>
<thead>
<tr>
<th>Are there barriers to wearing masks?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider:</td>
<td>Safety glasses fogging</td>
</tr>
<tr>
<td></td>
<td>wet or humid areas</td>
</tr>
<tr>
<td></td>
<td>very hot areas</td>
</tr>
</tbody>
</table>

### Gloves

<table>
<thead>
<tr>
<th>Are gloves worn?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>By whom?</td>
<td></td>
</tr>
<tr>
<td>Re-used or disposable?</td>
<td></td>
</tr>
</tbody>
</table>

### High Touch Surfaces

<table>
<thead>
<tr>
<th>Who is cleaning and how often?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider</td>
<td>Hand rails</td>
</tr>
<tr>
<td></td>
<td>machine controls</td>
</tr>
<tr>
<td></td>
<td>door handles</td>
</tr>
<tr>
<td></td>
<td>countertops and tabletops</td>
</tr>
</tbody>
</table>

### Process

<table>
<thead>
<tr>
<th>Shifts</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>What shifts are worked? How long and how many?</td>
<td></td>
</tr>
<tr>
<td>Consider</td>
<td>Can shifts be staggered to reduce congestion at shift change?</td>
</tr>
</tbody>
</table>

### Cleaning

<table>
<thead>
<tr>
<th>Assess cleaning between shifts</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider:</td>
<td>Common Areas</td>
</tr>
<tr>
<td></td>
<td>Work Stations</td>
</tr>
<tr>
<td></td>
<td>Bathrooms</td>
</tr>
</tbody>
</table>
Pre-Arrival Site Visit and Workplace Modifications

<table>
<thead>
<tr>
<th>Breakrooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Have employees clean their work areas upon arrival and before leaving.</td>
</tr>
<tr>
<td>Increase cleaning and sanitizing of restrooms, tools, equipment, and other frequently touched areas, including doorknobs/handles, water jug-spigots, chairs, benches, tables, working surfaces, and trash cans.</td>
</tr>
<tr>
<td>Ensure adequate supplies of soap, water, and disposable towels for more frequent handwashing</td>
</tr>
<tr>
<td>Make hand sanitizer stations available where needed.</td>
</tr>
<tr>
<td>Instruct workers on handwashing (20 seconds with soap and water)</td>
</tr>
<tr>
<td>Allow time for handwashing throughout the day, including at the beginning, during, and end of shifts and before/after meal breaks.</td>
</tr>
<tr>
<td>Instruct workers not to share tools and equipment and/or to sanitize them between uses.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Time Clocks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are they touch free?</td>
</tr>
<tr>
<td>Hand or fob?</td>
</tr>
<tr>
<td>Can they be eliminated with another process?</td>
</tr>
<tr>
<td>Checking in when present for temperature check?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Temperature Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temperature check upon arrival to work?</td>
</tr>
<tr>
<td>May be affected if checked outside in cold or if employee eating/drinking hot or cold food/beverage prior to temperature check.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Housing Units</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Walk through each unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are there differences from one unit to another in the same location?</td>
</tr>
<tr>
<td>What are the sleeping arrangements?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of Occupants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommend reducing number of people per room.</td>
</tr>
<tr>
<td>Place beds head to toe</td>
</tr>
<tr>
<td>Separate beds with barrier like plexiglas</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Bathroom Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Space or barrier between adjacent sinks</td>
</tr>
<tr>
<td>How many people at one time?</td>
</tr>
<tr>
<td>Private bathroom available for isolation patient?</td>
</tr>
<tr>
<td>If not can time for use be scheduled with cleaning after?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>House groups together who travel/arrive together?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laundry Facility</td>
</tr>
<tr>
<td>Avoid congregation</td>
</tr>
<tr>
<td>Sort/fold clothes in separate area to allow next person access</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mask in all common areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assign cleaning responsibilities for common areas, bathrooms and common areas and document completion.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discuss Isolation Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider Positive Men</td>
</tr>
<tr>
<td>Positive Women</td>
</tr>
<tr>
<td>exposed men and women who have not been tested or tested negative</td>
</tr>
<tr>
<td><strong>Pre-Arrival Site Visit and Workplace Modifications</strong></td>
</tr>
<tr>
<td>------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Facility or isolation and plan for meal delivery, monitoring, and transport if needed.</strong></td>
</tr>
<tr>
<td><strong>Dining Facilities</strong></td>
</tr>
<tr>
<td>Are meals provided for workers or do they prepare their own meals.</td>
</tr>
<tr>
<td>Schedule use of kitchen facilities and limit number of people present.</td>
</tr>
<tr>
<td>6 feet marks to separate in meal line</td>
</tr>
<tr>
<td>Limit number of chairs per table or provide Plexiglas barriers on tables between workers</td>
</tr>
<tr>
<td>Assign meal times so that everyone doesn't come at once</td>
</tr>
<tr>
<td>Outside dining options: Picnic tables, consider tents or awnings over them</td>
</tr>
<tr>
<td>To go containers to allow workers to return to rooms to eat or to spread out to social distance.</td>
</tr>
<tr>
<td>Have a &quot;to go&quot; window so people can walk up and get their meals handed to them outside.</td>
</tr>
<tr>
<td><strong>Transportation</strong></td>
</tr>
<tr>
<td>Is transportation required to and from work areas?</td>
</tr>
<tr>
<td>Limit number of people in vehicle. May need to run multiple trips or look for larger option such as busses.</td>
</tr>
<tr>
<td>Allow time for walking or possible use of bikes if distance allows.</td>
</tr>
<tr>
<td>Limit trips to town for shopping, pharmacy, entertainment.</td>
</tr>
<tr>
<td>Encourage curbside pick-up, deliver and pooling orders.</td>
</tr>
</tbody>
</table>
Update on Access to Health Care for Immigrants and Their Families

Last updated MAY 27, 2020

In this difficult time, we want to provide some reminders about access to health care for immigrants and their family members, including new funding that Congress recently made available for coronavirus testing.

- The Families First Coronavirus Response (Families First) Act, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, and the Paycheck Protection Program and Health Care Enhancement (Paycheck Protection) Act provided funds to health care providers that expanded the availability of free testing for COVID-19. The funding pays for testing at community health centers, outpatient clinics, doctors’ offices, and hospitals. The CARES Act also extended general funding for community health centers and made available funds to reimburse eligible health care providers for expenses and lost revenue related to COVID-19.

- Immigrants can continue to access health care services at community health centers, regardless of their immigration status, and at a reduced cost or free of charge depending on their income. However, people should call first to ask about the availability of COVID-19 screening and testing. Health centers may assess patients over the phone or through telehealth.

- Eligibility for Medicaid, the Children’s Health Insurance Program (CHIP), and the Affordable Care Act (ACA) marketplaces has not changed.

- States have flexibility to cover testing, treatment, and vaccines (when available) for COVID-19 as emergency Medicaid. Since the enactment of the Families First, CARES, and Paycheck Protection Acts, several states have determined that testing, diagnosis, and treatment of COVID-19 would be covered under emergency Medicaid.

- U.S. Citizenship and Immigration Services (USCIS) posted an alert clarifying that it will not consider testing, treatment, or preventive care (including vaccines if a vaccine becomes available) related to COVID-19 in a public charge inadmissibility determination, even if the health care services are covered by Medicaid.¹

More details are provided below.

The Families First, CARES, and Paycheck Protection Acts

The House and Senate have now passed, and the president has signed, the Families First Coronavirus Response (Families First) Act, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, and the Paycheck Protection Program and Health Care Enhancement (Paycheck Protection) Act.

The Families First Act provided a $1 billion health care fund to reimburse providers for COVID-19 “testing” of the uninsured through the National Disaster Medical System, and the CARES Act and Paycheck Protection Act dramatically expanded this fund.

- Anyone who is uninsured and not covered by Medicaid, the Children’s Health Insurance Program (CHIP), the Affordable Care Act (ACA) marketplace, or any other individual or group health plan is eligible for testing that can be paid for by this fund.

- Receipt of testing or other health care services through the disaster medical system will not be considered a negative factor in a “public charge” determination.

- The CARES Act clarified that the definition of uninsured individuals includes people who are enrolled in a Medicaid program or health plan that does not provide the minimum essential coverage defined by the Affordable Care Act, as well as low-income adults in states that opted not to expand their Medicaid programs, However, the act does not cover the costs of treatment directly.

- The CARES Act also built on a provision of the Families First Coronavirus Response Act by providing a $100 billion provider fund for expenses and lost revenue related to COVID-19. An unspecified portion of this fund administered by the Health Resources and Services Administration (HRSA) will be used to cover testing and treatment for the uninsured. Eligible providers include for-profit as well as public and nonprofit providers that offer testing, diagnosis, or care for people with actual or suspected cases of COVID-19.

- The Paycheck Protection Act provided an additional $75 billion to the provider fund for lost revenue or to cover testing and treatment for the uninsured.

---

5 Types of health insurance that count as coverage: [https://www.healthcare.gov/fees/plans-that-count-as-coverage/](https://www.healthcare.gov/fees/plans-that-count-as-coverage/).
The optional state Medicaid program (for testing only) created in the Families First Act did not provide for COVID-19 testing for immigrants who are ineligible for federal nonemergency Medicaid.

- The act creates an optional state Medicaid program that provides COVID-19 testing (and testing only) that will be funded with 100 percent federal Medicaid funds.
- However, this will be available only to uninsured people who meet federal Medicaid’s immigrant eligibility requirements.
- Federal Medicaid is available only to certain immigrants who have had a “qualified” immigration status for five years,7 “humanitarian” immigrants, military/veterans and their families (eligibility details here),8 and, in some states, lawfully residing children and/or pregnant women (state maps available here).9
- In states that elect this new optional testing program, eligible people can apply at Disproportionate Share Hospitals (DSHs) and federally qualified health centers (FQHCs). There will be no cost-sharing or other fees for people tested under this option.
- Receipt of Medicaid for emergency services, or by children under age 21 or pregnant women (including women who are 60 days postpartum), will not be considered a negative factor in a public charge determination.

The Families First Act also provided full coverage for COVID-19 testing for those who are already insured.

- The act requires coverage and eliminates cost-sharing (including copays and deductibles) for those who are covered by Medicaid, Medicare, Medicare Advantage, and private health insurance.

The CARES Act increased and extended Affordable Care Act funding for Community Health Centers (CHCs), augmenting their FY 20 funding by $1.3 billion and providing over $668 million for part of FY 21.

- As institutions that provide primary and preventive health care to anyone regardless of their immigration status or ability to pay, CHCs are essential providers for immigrant communities.

7 “Qualified” immigrants are: (1) lawful permanent residents (LPRs); (2) refugees, asylees, persons granted withholding of deportation/removal, conditional entry (in effect prior to Apr. 1, 1980), or paroled into the U.S. for at least one year; (3) Cuban/Haitian entrants; (4) battered spouses and children with a pending or approved (a) self-petition for an immigrant visa, or (b) immigrant visa filed for a spouse or child by a U.S. citizen or LPR, or (c) application for cancellation of removal/suspension of deportation, whose need for benefits has a substantial connection to the battery or cruelty (parent/child of such battered child/spouse are also “qualified”); and (5) victims of trafficking and their derivative beneficiaries who have obtained a T visa or whose application for a T visa sets forth a prima facie case. (A broader group of trafficking victims who are certified by or receive an eligibility letter from the Office of Refugee Resettlement are eligible for benefits funded or administered by federal agencies, without regard to their immigration status.)

8 https://www.nilc.org/issues/economic-support/table_ovrw_fedprogs/.
9 https://www.nilc.org/issues/health-care/healthcoveragemaps/.
The CARES Act also delayed cuts in Disproportionate Share Hospital funding to hospitals that serve a substantial number of indigent patients and provided additional funding for the National Health Service Corps.

- The National Health Service Corps is a program that places health care providers in underserved areas.

### The Affordable Care Act’s Health Care Marketplaces

- Immigrants who are lawfully present may be eligible to buy health insurance in the marketplaces (“lawfully present” defined here).¹⁰
- However, in between open enrollment periods, people can enroll only if they have a special life change that makes them eligible for a special enrollment period, such as losing health coverage or gaining lawful presence or U.S. citizenship (special enrollment period details here: http://www.healthreformbeyondthebasics.org/sep-reference-chart).

### Other Health Care Services Available

- Immigrants and their families can continue to seek services at community health centers, regardless of their immigration status, and at a reduced cost or free of charge, depending on their income.
- To find the nearest health center, go to https://findahealthcenter.hrsa.gov/.
- Call your nearest health center first to find out the availability of COVID-19 screening and testing. Health centers can assess whether a patient needs further testing, which may be done over the phone or using telehealth.
- Some states and localities provide state- or locally-funded health coverage programs for immigrants (table of state programs available here).¹¹

### Medicaid for Emergency Services, or “Emergency Medicaid”

#### Eligibility

Emergency Medicaid is available to individuals who are otherwise eligible for Medicaid, except for their immigration status. Some lawfully present individuals are ineligible for Medicaid based on immigration status (such as some people with temporary protected status (TPS), Deferred Action for Childhood Arrivals (DACA), or people with lawful permanent resident status who have had that status for less than five years), and undocumented people who are ineligible for Medicaid based on their immigration status.

---

¹⁰ https://www.nilc.org/issues/health-care/lawfullypresent/.
Note that the individual must also meet the income and other categorical eligibility requirements for Medicaid. For example, in a state that has not expanded Medicaid to cover adults without children, these adults (including U.S. citizens) would not be eligible for services.

Services Provided

Emergency Medicaid covers “a medical condition (including emergency labor and delivery) manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could reasonably be expected to result in (A) placing the patient’s health in serious jeopardy, (B) serious impairment to bodily functions, or (C) serious dysfunction of any bodily organ or part.” Social Security Act section 1903(v)(3).

“[Payment shall be made only if] such care and services are not related to an organ transplant procedure.” Social Security Act section 1903(v)(2)(c).

States have flexibility to cover testing, treatment, and vaccines (when available) for COVID-19 as emergency Medicaid. Since the enactment of the Families First and CARES Acts, several states have determined that testing, diagnosis and treatment of COVID-19 would be covered under emergency Medicaid. As of May 27, 2020, California, Colorado, Connecticut, Delaware, Massachusetts, Michigan, New York, Oregon, Pennsylvania, and Washington have written policies that recognize that COVID-19 services qualify as emergency Medicaid. Each state policy is slightly different — some states allow treatment in any outpatient setting, and some states include follow-up visits and medications as well. For updates, see the table titled “SPA and Other Administrative Actions to Address COVID-19” in the Kaiser Family Foundation’s “Medicaid Emergency Authority Tracker,” https://www.kff.org/medicaid/issue-brief/medicaid-emergency-authority-tracker-approved-state-actions-to-address-covid-19/ (in the table’s “BENEFITS” section, find the row that begins with “Cover COVID-related testing or treatment through Emergency Medicaid”).

If an individual receives Medicaid for emergency services only, it won’t count as a negative factor in a public charge determination about that person.

Emergency Medical Treatment and Labor Act

There is also a separate federal law called the Emergency Medical Treatment and Labor Act (EMTALA) that requires that anyone arriving at an emergency room/department be stabilized and treated regardless of insurance status or ability to pay. However, EMTALA does not provide any payment for these services. Therefore, individuals who are uninsured — and not eligible for emergency Medicaid — may be billed for this treatment. (Some hospitals have charity care or other ways to reduce a bill, but this is not always available and cannot always meet the need.)

Public Charge

USCIS has posted an alert clarifying that it will not consider testing, treatment, or preventive care (including vaccines if a vaccine becomes available) related to COVID-19 in a
public charge inadmissibility determination, even if the health care services are provided by Medicaid.\textsuperscript{13}

USCIS also specified that individuals who live in a jurisdiction where quarantine or social distancing are taking place and individuals who work for an employer or attend a school or university that shuts down to prevent the spread of COVID-19 can submit a statement with their immigration application about how these policies have affected factors considered in the public charge determination.

Medicare, CHIP, state-funded health programs, the health care marketplaces and private insurance are not considered “public benefits” under the public charge regulations and may be weighed positively as a source of health care coverage. Medicaid for emergency services, services provided to children under 21 years old, or pregnant women (including 60 days of postpartum services) are not weighed negatively in a public charge determination.

The U.S. State Department’s public charge regulations specifically exempt health services for immunizations and for testing and treatment of communicable diseases, as well as emergency services and services for children and pregnant women (including 60 days of postpartum services) in the public charge determinations made by consular officials abroad.

\textsuperscript{13} https://www.uscis.gov/greencard/public-charge.
Federal Resources (employer)

Agriculture Workers and Employers Interim Guidance from CDC and DOL

Families First Coronavirus Response Act: Employee Paid Leave Rights; Department of Labor

OSHA Complaint Filing
https://www.osha.gov/workers/file_complaint.html

Wisconsin Resources (workers and employers)
List and map of free and charitable health clinics in Wisconsin
http://www.wafclinics.org/find-a-clinic.html

List of Wisconsin Community Health Centers (also provide free or low-cost services)
https://www.wphca.org/page/FindHealthCenter

Wisconsin Local Public Health Departments
https://www.dhs.wisconsin.gov/health-depts/counties.htm

Dairy Organization Resources

National Milk Producers Federation COVID 19 Material Directory
https://www.nmpf.org/coronavirus/
Dairy Stream podcast: Focusing on #COVID-19
https://www.voiceofmilk.com/page/COVID-19

UW Extension COVID-19 Guidance for farm employers
https://farms.extension.wisc.edu/covid-19-guidance-for-farm-employers/

Dairy Responding to COVID-19; Cornell Pro-Dairy
https://prodairy.cals.cornell.edu/publications/covid-19/#Spanish

Podcast: Dr. Richard Stup of Cornell University discusses dairy farmers managing coronavirus

Five Steps to Formulate Workforce Contingency Plans in the COVID-19 Setting; Iowa Extension
https://www.extension.iastate.edu/agdm/wholefarm/pdf/c1-84.pdf
Recommended Practices for Anti-Retaliation Programs

How to Use These Recommended Practices

This set of recommendations is intended to assist employers in creating workplaces that are free of retaliation, including retaliation against employees who engage in activity protected under the 22 whistleblower laws that the Occupational Safety and Health Administration (OSHA) enforces. This document is advisory in nature and informational in content. It is not mandatory for employers, and does not interpret or create legal obligations.

These recommendations are intended to be broadly applicable to all public and private sector employers that may be covered by any of the whistleblower protection provisions enforced by OSHA. This recommended framework can be used to create and implement a new program, or to enhance an existing program. While the concepts outlined here are adaptable to most workplaces, employers may adjust these guidelines for such variables as employer size, the makeup of the workforce, and the type of work performed.1

This guidance is directed at employers that may be covered by the 22 whistleblower protection statutes that OSHA enforces, although the basic principles in this guidance could also be useful in circumstances where other anti-retaliation protections apply. This guidance is not intended to advise employees about their rights or protections under any whistleblower protection statute enforced by OSHA or any other government agency. Information and resources about employees’ rights under the whistleblower protection statutes that OSHA enforces can be found at www.whistleblowers.gov.

Retaliation Is Against the Law

OSHA’s Whistleblower Protection Program enforces the whistleblower provisions of 22 federal statutes protecting employees who raise or report concerns about hazards or violations of various workplace safety and health, airline, commercial motor carrier, consumer product, environmental, financial reform, food safety, health insurance reform, motor vehicle safety, nuclear, pipeline, public transportation agency, railroad, maritime, and securities laws (see list of statutes at the end of this document).

An employer must not retaliate against an employee for engaging in activities that are protected under these laws. Protected activities may include: filing a report about a

---

1 The core recommendations presented in this document were recommended unanimously by the Secretary of Labor’s Whistleblower Protection Advisory Committee.
possible violation of the law with OSHA or other government agencies, reporting a concern about a possible violation of the law to the employer, reporting a workplace injury, illness, or hazard, cooperating with law enforcement, refusing to conduct tasks that would violate the law, or engaging in any other type of statutorily protected activity.

Preventing Retaliation Is Good for Workers and Good for Business

Retaliation against employees who raise or report concerns or otherwise exercise their rights under these laws is not only illegal, it is also bad for workers and bad for business. A proactive anti-retaliation program is designed to (1) receive and respond appropriately to employees’ compliance concerns (i.e., concerns about hazards or potential employer violations of one of the 22 laws) and (2) prevent and address retaliation against employees who raise or report concerns. Without an effective program, problems in the workplace may go unreported because workers fear retaliation for reporting concerns or feel frustration over the lack of effective resolution of their concerns.

An anti-retaliation program that enables all members of the workforce, including permanent employees, contractors and temporary workers, to voice their concerns without fear of retaliation can help employers learn of problems and appropriately address them before they become more difficult to correct. A program based on this proactive approach not only helps employers ensure that they are following federal laws, but also helps create a positive workplace culture that prevents unlawful retaliation against employees. Furthermore, a successful anti-retaliation program improves employee satisfaction and engagement, and helps protect workers and members of the public from the harm of violations of federal laws and regulations.

Employees’ Rights to Report to the Government

While an anti-retaliation program that enables employees to communicate their compliance concerns to the employer can be beneficial to employers, workers, and the public, employers must also recognize that employees have the right to provide “tips” or file complaints about hazards or potential violations of the law with OSHA and other government agencies. Employer policies must not discourage employees from reporting concerns to a government agency, delay employee reports to government, or require employees to report concerns to the employer first. OSHA also cautions employers that an anti-retaliation program must not have the effect of discouraging or misleading employees about their right to report compliance concerns or retaliation externally. Anti-retaliation program policies and training for management and employees should clearly explain employees’ rights to report hazards, violations of the law and retaliation externally, and that retaliation for reporting externally is against the law.
What Is Retaliation?

Retaliation occurs when an employer (through a manager, supervisor, or administrator) takes an adverse action against an employee because the employee engaged in protected activity, such as raising a concern about a workplace condition or activity that could have an adverse impact on the safety, health, or well-being of the reporting employee, other workers, or the public; or reporting a suspected violation of law. Retaliation also occurs when an employer takes an adverse action because an employee reported an injury or to dissuade an employee from reporting an injury. An adverse action is an action that could dissuade or intimidate a reasonable worker from raising a concern about a workplace condition or activity. Retaliation against an employee is not only harmful to the employee who experienced the adverse action, it can also have a negative impact on overall employee morale because of the chilling effect that retaliation can have on other employees’ willingness to report concerns.

Because adverse action can be subtle, it may not always be easy to spot. Examples of adverse action include, but are not limited to:

- Firing or laying off
- Demoting
- Denying overtime or promotion
- Disciplining
- Denying benefits
- Failing to hire or rehire
- Intimidation
- Making threats
- Blacklisting (e.g., notifying other potential employers that an applicant should not be hired or refusing to consider applicants for employment who have reported concerns to previous employers)
- Reassignment to a less desirable position or actions affecting prospects for promotion (such as excluding an employee from training meetings)
- Reducing pay or hours
- More subtle actions, such as isolating, ostracizing, mocking, or falsely accusing the employee of poor performance.

Creating an Anti-Retaliation Program

Implementing an effective anti-retaliation program is not intuitive and requires specific policies and commitments. There are five key elements to creating an effective anti-retaliation program:

1. Management leadership, commitment, and accountability
2. System for listening to and resolving employees’ safety and compliance concerns
3. System for receiving and responding to reports of retaliation
4. Anti-retaliation training for employees and managers
5. Program oversight
In order to effectively support employee reporting and protect employees from retaliation, employers should integrate all five elements into a cohesive program.

**Management Leadership, Commitment, and Accountability**

To make preventing retaliation and following the law integral aspects of the workplace culture, it is important that senior management demonstrate leadership and commitment to these values. Senior management, such as the CEO and board (if applicable), should lead by example to demonstrate a culture of valuing and addressing employees’ concerns regarding potential violations of the law and commitment to preventing retaliation. To demonstrate commitment, management should back up words with actions; written policies that are not actively practiced and enforced are ineffective. Managers at all levels should be held accountable for the quality of their response to employees’ concerns, including reports of potential violations of the law, of safety hazards, and of retaliation.

**How can management show commitment to preventing retaliation?**

- Ensure that the systems for reporting hazards, compliance concerns and retaliation—including systems for maintaining the confidentiality of employees who make reports (discussed in more detail in elements 2 and 3 below)—are implemented, enforced, and evaluated by a designated manager who is responsible and accountable for these programs, and has access to top managers and the board (if applicable).
- Confer with workers and worker representatives (if any) about creating and improving management awareness and implementation of anti-retaliation policies and practices.
- Require training for managers and board members (if applicable) to make certain they understand what retaliation is, the employer’s and their own legal obligations (including their obligation to maintain the confidentiality of employees who make reports), the organizational benefits of anti-retaliation practices, and what it takes programmatically to prevent retaliation. (For more information, see element 4 below.)
- Ensure that there is a mechanism for accurately evaluating employees’ willingness to report concerns about the workplace and the employer’s actual record in preventing retaliation against employees who report, and ensure that there is a means for accurately reporting to top management the results of such evaluation.
- If appropriate, and taking into account an employee’s preference for confidentiality, publicly recognize the contribution of employees whose disclosures have made a positive difference for the employer, perhaps through an award that is publicized company-wide.
How can management be held accountable for preventing retaliation?

- Incorporate anti-retaliation measures (e.g., promptly and constructively addressing employee concerns, attending training, and championing anti-retaliation initiatives) in management performance standards and reviews.
- Implement strong codes of conduct and ethics programs that clearly identify whistleblower retaliation as a form of misconduct to ensure anti-retaliation policies and practices are enforceable.
- Apply appropriate consequences, such as discipline, to managers who retaliate or who violate the confidentiality of an employee who has made a report. These consequences should be sufficient to serve as a deterrent to future acts of retaliation.

System for Listening to and Resolving Employees’ Safety and Compliance Concerns

To help prevent retaliation, employers should proactively foster an organizational culture in which raising concerns about workplace conditions and activities is valued. Employers can cultivate such an environment by listening to and resolving employees’ compliance concerns. Specifically, employers should establish procedures that enable employees to report concerns (including through confidential or anonymous channels, when possible), provide for fair and transparent evaluation of concerns raised, offer a timely response, and ensure a fair and effective resolution of concerns. In developing these policies, employers should work with employees and worker representatives (if any).

What can employers do to enable employees to raise safety and compliance concerns?

- Create at least one or, preferably, multiple channels for reporting compliance concerns. Channels can include helplines, anonymous reporting through email boxes or websites, or reporting to a trusted official and/or an ombudsman.
- Protect the confidentiality or anonymity of employees who report concerns, and ensure that confidentiality is not used as a shield to prevent whistleblowers from having access to information needed to exercise their rights.2
- Give employees clear and accessible instructions on how they can report compliance concerns both internally and externally, and make clear that the employee has the right to choose which avenue to use to report concerns. Employees must not be penalized for reporting concerns to the employer by a means other than through these channels.
- Ensure that the program does not restrict or discourage employees from reporting allegations to the government or other appropriate regulatory and oversight agencies.

---

2 While an employee should be permitted to remain anonymous when reporting compliance concerns internally (i.e., within the company) or externally to a government agency, the 22 whistleblower statutes enforced by OSHA do not allow for an employee to anonymously file a retaliation complaint with OSHA.
• Provide employees with opportunities to share information informally and to ask questions at an early stage, before issues become more difficult to resolve.

• Eliminate or restructure formal and informal workplace incentives that may encourage or allow retaliation or discourage reporting. Examples of incentives that may discourage reporting or encourage retaliation include rewarding employee work units with prizes for low injury rates or directly linking supervisors’ bonuses to lower reported injury rates.

(For additional information on incentive programs, see OSHA’s information on Employer Safety Incentive and Disincentive Policies and Practices, [http://www.osha.gov/as/opa/whistleblowermemo.html](http://www.osha.gov/as/opa/whistleblowermemo.html), Revised VPP Memo #5: Further Improvements to the Voluntary Protection Programs, [https://www.osha.gov/dcsp/vpp/policy_memo5.html](https://www.osha.gov/dcsp/vpp/policy_memo5.html), and incentive program guidance at [https://www.osha.gov/recordkeeping/modernization_guidance.html](https://www.osha.gov/recordkeeping/modernization_guidance.html).)

**How should employers ensure prompt and fair resolution of compliance concerns?**

• Have an independent investigator review reports of concerns promptly, thoroughly, and with transparency, including responding to the employee who brought forward the initial concern.

• Ensure that supervisors or managers respond in a constructive and timely manner upon receiving reports of concerns from employees.

• Guarantee that employee rights are protected even if the person is incorrect or unpleasant in raising a concern.

• Follow through on employee concerns, even if they appear to be trivial.

• Have a strong, enforceable policy of not punishing employees for reporting concerns or incidents or for engaging in any other protected activity.

• Help employees get unbiased, confidential advice or information about exercising whistleblower rights and coping with the stress of reporting concerns, such as by providing a list of resources.

• Ensure that any employment agreement or policy that requires employees to keep employer information confidential does not prohibit or discourage employees from reporting or taking the steps necessary to report information reasonably related to concerns about hazards or violations of the law to any government agency. Steps that may be necessary include conferring with legal counsel, union or other worker representatives, or with medical professionals regarding the employee’s concerns. Employers should not use confidentiality or non-disclosure agreements to penalize, through lawsuits or otherwise, employees who report suspected violations of the law or take steps necessary to make such reports.

• Ensure that employment status changes, such as demotions and denials of promotions, are only made for legitimate non-retaliatory reasons and are not likely to be perceived as retaliatory.

Create at least one or, preferably, multiple channels for reporting compliance concerns.
If an employee is disciplined after reporting a concern, injury, or other issue, how should the employer review the discipline to ensure that it is not retaliatory?

Ask questions such as:

- Did the employee’s report influence the decision to initiate disciplinary action in any way?
- Has the employer disciplined other employees who engaged in the same conduct as the employee but who did not report a concern?
- Is the discipline imposed on the employee of the same severity as the employer’s response to the same conduct by other employees who did not report a concern?
- Has the disciplinary action been independently reviewed by a manager who was not involved in the incident?
- If the employer uses progressive discipline, has it been appropriately used up to this point?
- Could the workforce perceive the punishment as retaliatory? If so, what actions can management take to mitigate the potential chilling effect?

System for Receiving and Responding to Reports of Retaliation

Employees who believe they have experienced retaliation should have independent channels for reporting the retaliation; they should not be required to report to the manager who they believe retaliated against them. The reporting employee should also have the ability to elevate the matter to higher levels, if necessary. There should be clearly defined roles and responsibilities for managers at all levels and others who are involved in responding to reports of retaliation, such as human resources or ethics and compliance personnel. The procedures should be known and accessible to all.

When retaliation is reported, employers should investigate the claim promptly and thoroughly, utilizing an established retaliation response system. Such investigations should:

- Take all reports of retaliation seriously.
- Maintain employee confidentiality as much as possible to protect the employee from further retaliation or isolation by coworkers. However, employers should not use confidentiality as a shield to impede a government agency’s or the employee’s ability to successfully resolve the retaliation claim.
- Be transparent to the employee alleging retaliation about how investigations are conducted, including the roles and independence of the investigators.
- Investigate claims using an objective, independent complaint review process; focus on evaluating the circumstances surrounding the employment decision objectively rather than on defending against the claim; and listen to all sides before making a judgment.
• Ensure that investigations of alleged retaliation are not tainted by preconceptions about what happened.
• Utilize conflict of interest protections.
• Involve senior managers and others who recognize the organizational impact, benefits, risks, and policy ramifications of both the reported concern and the need to prevent retaliation against the reporting employee.
• Ensure that the program does not restrict or discourage employees from reporting retaliation allegations to the government or other appropriate regulatory and oversight agencies.
• Keep the reporting employee and management representatives informed of developments throughout the investigation and ensure respectful, proper closure of the issue.
• After the reported problem has been investigated and resolved, periodically follow up with the reporting employee for a reasonable amount of time to ensure continued protection from retaliation.
• Use third-party, independent investigators if the employer can support it and the circumstances warrant it (e.g., when the allegations involve particularly polarizing or high-stakes issues).
• If possible, make the anti-retaliation investigation completely independent from the corporation’s legal counsel, who is obligated to protect the employer’s interests. If the employer’s legal representative is involved in conducting the investigation, fully inform the whistleblower that the investigator represents the employer’s interests and that any attorney-client privilege will only extend to the employer.
• Consider using early dispute resolution techniques when significant disputes arise about an employee’s disclosures or when considering implementing adverse actions like termination or demotion.
• Ensure that employees understand that they may file a retaliation complaint with OSHA and, if applicable, another government agency and that any internal investigation by the employer or attempts at early dispute resolution by the employer will not automatically delay or toll the deadline for filing a retaliation complaint with OSHA or another government agency. In certain circumstances, employers should consider whether offering to formally delay the deadline to file would be appropriate.
• Be attuned to the potential for a chilling effect caused by the workforce’s perception that management’s actions were retaliatory, and if likely, address such a perception through timely and effective communications or other mitigating strategies.

Take all reports of retaliation seriously.

Employers should respond quickly to reports of retaliation. Failure to do so can discourage employees from reporting concerns about workplace conditions or activities.

If the employer confirms that retaliation took place, it should remedy the retaliation and review its anti-retaliation program to determine why the system failed and what changes may be needed to prevent future retaliation. Workers and worker representatives (if any) should be integrally involved in this evaluation.
Anti-Retaliation Training for Employees and Managers

Effective training of employees and all levels of management and the board (if applicable) is key to any anti-retaliation program. Training is essential because it provides management and employees with the knowledge, skills, and tools they need to recognize, report, prevent, and/or properly address hazards, potential violations of the law, and retaliation. Training should be tailored to teach workers and managers about the specific federal whistleblower protection laws and company policies that apply to them, employees’ rights under the laws, how employees can exercise their rights using available internal and external protection programs, and the organizational benefits of such programs. Managers should learn these concepts as well as related skills, behaviors, and obligations to act.

Training should be provided in accessible language(s) and at a level that can be easily understood by the intended audience.

Anti-retaliation training for employees, at a minimum, should include coverage of:

- Relevant laws and regulations.
- An explanation of the employer’s commitment to creating an organizational culture of complying with the law, addressing concerns from all members of the workforce (permanent employees, contractors, and temporary workers) about potential hazards and violations of the law, and complying with its code of ethics, including prohibitions on retaliation.
- Employees’ rights and obligations, if any, to report potential hazards and violations of the law externally to law enforcement, including OSHA and other government agencies, regardless of whether the employee first reported the violation to the employer.
- Statutory rights to be protected from retaliation for reporting potential violations.
- The elements of the employer’s anti-retaliation program, including roles and responsibilities, how to report concerns internally and externally, options for confidential or anonymous reporting, and how to elevate a concern internally when supervisors or others do not respond.
- What constitutes retaliation, including actions such as firing or laying off, demoting, denying overtime or promotion, disciplining, denying benefits, failure to hire or rehire, reducing pay or hours, and blacklisting, along with common but less overt behaviors, such as ostracizing, mocking, intimidating, and making false accusations of poor performance.

In addition to the employee training topics described above, anti-retaliation training for managers should include, at a minimum:

- Skills for defusing conflict, problem solving, and stopping retaliation in a work group.
• How to respond to a report of a workplace concern while protecting an employee’s confidentiality and without engaging in retaliation, appearing to engage in retaliation, or questioning the motives for the report.
• How to separate annoying or inappropriate behavior from the concern itself.
• Consequences for managers who fail to follow anti-retaliation policies or respond to concerns inappropriately.
• How to recognize that an employee believes there has been retaliation, when employers are required to act, and the potential legal consequences the employer and the manager face for inaction.
• Other issues specific to the employer.

Legal requirements can change. Employers should create a process for staying up to date on changes to anti-retaliation laws and regulations and update their training and policies accordingly. Refresher training should be conducted on a regular basis and as needed, such as when there is a change in legal requirements, when retaliation has occurred, or when program oversight reveals that it is needed. Concepts from the training should not only be discussed during the designated training sessions, but should be reinforced frequently using other types of communications in order to make it part of the workplace culture.

Effective training is key to any anti-retaliation program.

Program Oversight

A well-designed anti-retaliation program needs rigorous oversight to ensure that it is effective and working as intended. Employers should develop and implement a plan for oversight of the anti-retaliation program, review oversight findings, and ensure that the program is improved and modified as needed.

What are some methods of oversight that can be used to assess the anti-retaliation program?

Monitoring and audits are two forms of oversight that can help employers gain insight into a program’s strengths and weaknesses and reveal whether program improvements are needed.

• Monitoring is an ongoing analysis of whether the program processes in place are achieving the organization’s planned results and program goals.
• Auditing is an independent, formal, and systematic approach designed to determine whether program processes are efficient, effective, and working as intended. Audits should be conducted by individuals who are independent of the process being audited.

The functions of monitoring and auditing may overlap, and results from any one activity can be used to direct efforts of the other activities.

What issues should employers assess using oversight tools like monitoring and auditing?

Oversight tools like monitoring and auditing should be tailored to meet an organization’s specific needs. Examples of the types of anti-retaliation program topics that may be assessed using oversight include:
• Trends in issue reporting and resolution, including anonymous reporting;
• Whether managers are following program policies;
• Whether workers are unafraid of retaliation and coming forward with concerns; and
• Whether the types of measurements that are used to track issue response and reward improvement could have the effect of discouraging reporting rather than incentivizing it.

Note that when new anti-retaliation programs are implemented, the numbers of reported incidents may rise at first. This often means that employees are more comfortable reporting, not that there are a larger number of concerns to report.

**What sources of information should be examined during program oversight?**

Program oversight may examine a variety of sources, such as: anonymous surveys; confidential interviews with employees who reported compliance concerns or retaliation; narratives from injury or error reports; case studies of investigated issues and responses; claims department or risk management case files related to injuries or errors; and complaint files relating to reporting requirements.

Employers can also cross-check the data obtained as part of monitoring or auditing with other sources of relevant information, such as information reported to workers’ compensation, in grievances, to outside agencies, or in exit interviews. Cross-checking these other sources of information could reveal whether a policy is creating a chilling effect or other barrier that is discouraging or preventing employees from reporting compliance concerns or retaliation.

**How should employers use the results or findings of program oversight?**

The results of oversight activities like monitoring and auditing should be reported directly to the top managers and the board (if applicable). The results should also be shared with all levels of management and the workers covered by the program.

Top-level managers and board members (if applicable) should review in-depth results of monitoring and auditing, including dashboard reports on all program measurements. Management should also periodically discuss the program with employees and worker representatives (if applicable) to get ideas and feedback.

Employers should use monitoring results as a basis for program improvements and accountability. If the results identify problems, employers should determine whether possible system failures led to the problem and make changes to the reporting system if warranted. Managers should create plans to improve work groups or facilities that have trends indicating room for improvement.
How OSHA Can Help

Filing a complaint

Employees who believe that they have been retaliated against in violation of any of the 22 whistleblower protection statutes that OSHA enforces may file a complaint with OSHA. Employees must file a complaint with OSHA before the filing deadline under the relevant statute (filing deadlines vary by statute). For example, a complaint of retaliation under the Occupational Safety and Health Act must be filed within 30 days of the alleged retaliation. For more information about the filing deadlines for the whistleblower statutes that OSHA enforces, view our “Whistleblower Statutes Desk Aid” at www.whistleblowers.gov/whistleblowerActs-deskReference.pdf.

Complaints may be filed with OSHA by visiting or calling the local OSHA office at 1-800-321-OSHA (6742), or may be filed in writing by sending a written complaint to the closest OSHA regional or area office, or by filing a complaint online at www.whistleblowers.gov/complaintPage.html. Written complaints may be filed by facsimile, electronic communication, hand delivery during normal business hours, U.S. mail (confirmation services recommended), or other third-party commercial carrier.

Further information

For more information on filing a complaint under the 22 whistleblower statutes that OSHA enforces, please visit www.whistleblowers.gov. You can also call OSHA at 1-800-321-OSHA (6742) if you have questions or need more information.
Coronavirus/COVID-19 Lista de verificación para el trabajo agrícola

Mantenga una Fuerza Laboral Saludable
Los síntomas más comunes de COVID-19 son **fiebre, tos y dificultad para respirar**. Las personas infectadas con COVID-19 y los que presenten cualquiera de estos síntomas **no deberían trabajar**. COVID-19 se transmite principalmente por contacto de persona a persona y es altamente contagioso.

☐ Desarrolle un plan para identificar a trabajadores que presenten síntomas del COVID-19 cuando lleguen al trabajo:
  - Establezca las razones para mandar a alguien a casa (por ejemplo, aquellos con uno, dos o tres de los síntomas principales, tiene contacto con una persona enferma en casa).
  - Identiﬁque quién será responsable de evaluar a los trabajadores.
  - Envíe a casa a los trabajadores que presenten síntomas de COVID-19, o cualquier otro criterio especíﬁco de su compañía.

☐ Comunique claramente a los trabajadores cuál es su plan y cuáles son los síntomas que estará evaluando en los trabajadores.
  - Informe a los trabajadores que deben quedarse en casa si tienen cualquiera de estos síntomas.
  - Pida a los trabajadores que informen a su supervisor de inmediato si comienzan a sentir síntomas mientras están trabajando.

☐ Observe a los trabajadores para identificar si tienen síntomas al llegar al trabajo y obsérvelos durante todo el día, en caso de que aparezcan los síntomas.

☐ Envíe a casa a los trabajadores con síntomas y aconséjelos llamar a su proveedor de salud.

Limpieza e Higiene
Buena higiene y limpieza personal pueden ayudar a reducir la exposición al COVID-19.

☐ Aumente la limpieza y desinfección de baños, herramientas, equipos y otras áreas que se toquen con frecuencia, incluyendo las llaves del agua para tomar, sillas, mesas, superficies de trabajo y botes de basura.

☐ Asegúrese de que haya suficientes jabón, agua y toallas desechables disponibles para lavarse las manos con más frecuencia.

☐ Tenga disponibles estaciones con desinfectantes para manos donde sea necesario.

☐ Instruya a los trabajadores sobre el lavado de manos (20 segundos con agua y jabón).

☐ Permita el tiempo necesario para lavarse las manos durante todo el día, incluyendo al empezar a trabajar, durante el día, al final de su turno, y antes y después de los descansos para comer.

☐ Recuerde a los trabajadores que usen la parte interna del codo al toser o estornudar, y que eviten tocarse la cara y los ojos.

☐ Instruya a los trabajadores para que no compartan herramientas y equipos y/o que los desinfecten entre usos.

Distanciamiento Social
Es sumamente importante mantener una distancia social adecuada entre personas, (**seis (6) pies**), para ayudar a minimizar la exposición al COVID-19 y para seguridad de todos.

☐ Use una cinta o tira de medir para mostrar la distancia que son 6 pies.

☐ Aconseje a los trabajadores que eviten los saludos sociales como: apretones de manos, abrazos y tocarse con los puños o codos. Sugiera levantar su mano para saludar a distancia o sonreír.

☐ Proporcione tiempo y espacio adecuados para que los trabajadores registren su entrada al comienzo del turno manteniendo una distancia segura entre ellos.

*continúa en la página 2*
Organice reuniones y capacitaciones en grupos pequeños para que los trabajadores puedan mantener una distancia de 6 pies entre ellos y a la vez puedan escuchar a la persona dando la presentación.

Cuando se encuentre en el campo, huertos, viñedos o empacadoras, los trabajadores deben mantener una distancia mínima de 6 pies entre sí en todo momento.
  • Escalonar a los trabajadores entre los surcos, o las líneas de producción.
  • Ajuste el ritmo en que se mueve el producto durante la inspección o clasificación, para que haya menos trabajadores en la línea

Proporcione espacio para permitir que los trabajadores mantengan una distancia de 6 pies, o más, entre ellos durante los períodos para descanso y comida.

Monitorear y recordar a los trabajadores que mantengan una distancia de 6 pies durante su turno de trabajo
Coronavirus/COVID-19 Agricultural Worksite Checklist*

Maintain a Healthy Workforce
The most common symptoms of COVID-19 are fever, cough, and shortness of breath. Individuals infected with COVID-19 and those exhibiting any of these symptoms should not work. COVID-19 is primarily spread from person-to-person contact and is highly contagious.

☐ Create a plan for screening workers for COVID-19 symptoms when they arrive at work
  • Establish reasons for sending someone home (e.g. those with one, two, or three of the primary symptoms)
  • Identify who will be responsible for screening workers
  • Send workers home who exhibit COVID-19 symptoms or any other company-specific criteria

☐ Clearly communicate your plan and the symptoms you will be screening for to workers
  • Inform workers that they must stay home if they are suffering from these symptoms
  • Ask workers to inform their supervisor immediately if they begin to feel symptoms while at work

☐ Observe workers for symptoms as they arrive to work and throughout the day in the event symptoms emerge

☐ Send workers who have symptoms home and advise them to call their health care provider

Sanitation & Hygiene
Good sanitation and personal hygiene can help minimize exposure to COVID-19.

☐ Increase cleaning and sanitizing of restrooms, tools, equipment, and other frequently touched areas, including doorknobs/handles, water jug spigots, chairs, benches, tables, working surfaces, and trash cans

☐ Ensure adequate supplies of soap, water, and disposable towels for more frequent handwashing

☐ Make hand sanitizer stations available where needed

☐ Instruct workers on handwashing (20 seconds with soap and water)

☐ Allow time for handwashing throughout the day, including at the beginning, during, and the end of their shift, and before and after meal breaks

☐ Remind workers to cough and sneeze into their elbows and avoid touching their faces and eyes

☐ Instruct workers not to share tools and equipment and/or to sanitize them between uses

Social Distancing
It is critical to maintain adequate social distance (six (6) feet) to help minimize exposure for the safety of all.

☐ Use a tape measure or measuring stick to demonstrate the 6-foot distance

☐ Advise workers to avoid social greetings such as handshakes, hugs, and fist or elbow bumps; encourage waves and smiles instead

☐ Provide adequate time and space for workers to clock in at the beginning of their shift while maintaining a safe distance from each other

☐ Hold meetings and trainings in small groups so workers can maintain 6 feet of distance between each other and still hear the speaker

☐ When in fields, orchards, vineyards, or packing houses, each worker should maintain a minimum of 6 feet from each other at all times
  • Stagger workers over and within rows
  • Adjust product flow for adequate inspection or sorting with fewer workers on the line

☐ Provide space to allow workers to maintain a 6-foot distance from others during rest and meal periods

☐ Monitor and remind workers to maintain a 6-foot distance throughout their shift
Overview

The U.S. is confronting an outbreak of a novel coronavirus that causes serious respiratory disease and may be especially deadly for older people and those with weakened immune systems. The World Health Organization has classified the outbreak as a global pandemic because it is affecting countries all over the world. Individuals and organizations can fight coronavirus by taking steps to prevent its transmission, which will lower the infection rate and prevent health care systems from being overwhelmed. The spread of the virus has raised concerns about how it may affect public health as well as our economy, including dairy production.

Dairy farms are 24-hour, 7-day per week business and operations must continue. Following U.S. Centers for Disease Control and Prevention (CDC) precautions will minimize the risk to dairy farmers, family, employees and essential professional and service providers to be on the farm.

Coronavirus Symptoms

Affected individuals have reported mild to severe respiratory symptoms, fever, cough, shortness of breath, and breathing difficulties. In severe cases, the virus has led to pneumonia and kidney failure, and, in some cases, death. The CDC believes symptoms may appear within two to fourteen days after exposure, although not everyone who is exposed to the virus will exhibit symptoms of being ill.

Dairy Farm Workforce Preventive Measures

While there is currently no vaccine to prevent this virus in humans, these simple steps can help minimize the spread of this and other respiratory viruses:

• Access to the dairy farm by non-essential persons should be limited.
• Wash your hands often with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer.
• Wash your hands before you eat after working in the milking parlor or other areas of the dairy.
• Avoid touching your eyes, nose and mouth with unwashed hands.
• Avoid close contact with people who are sick, both on and off the dairy.
• Stay home when you are sick.
• Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
• Always wear milking gloves.
• When you get home after working in the dairy, always take a shower and wash your work clothes.
• Clean and disinfect frequently touched objects and surfaces. Social distancing—reducing the number of close physical and social contacts we have with one another—should be practiced, such as when there is a need to get supplies from a farm and feed store.
**Employer Action Steps**

Employers should make sure that work environments are as clean as possible to prevent the spread of contagions. They should also make clear that employees who have symptoms of a potential contagious illness must not report to work while sick. Employers should check the CDC website regularly for coronavirus updates and have open and informed conversations with concerned employees about the virus and its potential impact.

The farm workforce is not immune to coronavirus. Please take steps to protect yourself and your employees.

1. Talk with your employees about coronavirus, how it spreads, and how to prevent getting infected.
2. Print the [CDC factsheets and posters](https://www.cdc.gov/), post in your workplace and employee housing facilities in their native languages.
3. Provide guidance to help employees clean and disinfect housing.
   - [CDC guidance for cleaning homes](https://www.cdc.gov/homeandworkplace/prevention/coronavirus.html)
4. Clean and disinfect your workplace. The employee breakroom and bathroom are great places for virus to be transmitted. Clean and disinfect any areas where employees congregate or routinely touch items such as doorknobs and computer keyboards. Set up daily and weekly cleaning schedules.
5. Provide supplies such as cleaning solutions, buckets, mops, brushes, etc., for cleaning at work and for those living in employer-provided housing. ([CDC list of approved antimicrobial cleaning products](https://www.cdc.gov/homeandworkplace/cleaners-disinfectants.html))
6. Keep restrooms and other areas of the dairy stocked with disinfectants and soap.
7. All unnecessary people should not be on a dairy farm at this time.
   - Farm tours should be suspended until such time as the human-to-human transmission risk has abated.
   - Use teleconferences to talk with advisors who do not need to be on the farm such as nutritionist, banker/loan officer, extension personnel, etc.
8. For dairy farms with retail stores on-site, operate in accordance with the recommendations of federal, state and local health officials.
9. Review your sick-leave policy. People who are sick should stay home, only leaving to receive medical care. Do you provide paid sick leave for your employees? If not, will employees feel financially obligated to come to work even when sick?
   - Refer to the National Dairy FARM Program’s [State Legal Fact Sheets](https://www.nationaldairyfarm.com/resources/state-legal-fact-sheets) for awareness of the required state and federal laws around paid sick leave.
10. Communicate with employees that they should stay home if sick. Employees sometimes come to work believing they will face punishment or firing if they miss work. Be sure your employees understand that their health and that of their co-workers comes first. Communicate and plan to cover for sick employees.
11. Prepare your disaster contingency plan. What will you do if 50% of your employees become sick and unable to work? Could neighboring farms share resources in an emergency? Who will manage your operation if you or another key manager are unable to leave your house or are hospitalized?
   - The National Dairy FARM program has developed [Comprehensive Emergency Action Plan Guidance](https://www.nationaldairyfarm.com/resources/emergency-action-plan-guidance), which provides pertinent information and steps for a dairy to follow if an emergency should occur.
   - Cornell provides the [Extension Disaster Education Network](https://extension.extension.org/) offering community education resources across the entire disaster cycle of preparedness, response, and recovery.
   - Penn State also provides [farm disaster preparedness resources](https://www.extension.psu.edu/farm-disaster-preparedness).
Frequently Asked Questions

What should a dairy employer do if an employee exhibits symptoms of COVID-19?

According to the Equal Employment Opportunity Commission (EEOC), sending home an employee who displays symptoms of a contagious illness does not violate the ADA because: (1) if the illness ultimately turns out to be relatively mild or routine (e.g., seasonal flu), it would not have constituted a covered disability in the first place; and (2) if the illness does turn out to be severe (so that it could constitute a disability under the ADA), then it would likely pose a “direct threat” supporting the employer’s decision. An employer should consider clearly communicating that it has the right to send home any employee exhibiting symptoms of a potentially contagious disease.

If a dairy employer or employee is experiencing symptoms of COVID-19, how can that person be tested?

If you think you or an employee has been exposed to COVID-19 and develop a fever and symptoms such as a cough or difficulty breathing, call a healthcare provider for medical advice.

What should be done if an employee tests positive for COVID-19?

If an employee or individual currently working, or recently present, within your facility is confirmed by a laboratory to be positive for COVID-19, immediately notify your local health department. Ensure that all sensitive surfaces and areas are immediately cleaned and disinfected.

Your local health department will be involved in monitoring the employee or individual while symptomatic and under isolation until they recover. The authorities may recommend additional testing of coworkers. It also will be involved in clearing fully recovered employees from isolation before they can return to work. The local health department may provide further guidance on monitoring and segregating employees who came into close contact with positive individuals.

If a person has been exposed to bovine coronavirus, does that person have any immunity to COVID-19?

A person exposed to bovine coronavirus is not expected to be immune to COVID-19 and should follow all recommendations from public health authorities to minimize contracting COVID-19. The bovine coronavirus and COVID-19 are two different and distinct viruses, each causing a different disease in different species. Bovine coronavirus specifically causes illness in cattle, while COVID-19 is only known to cause illness in humans.

References

Reseña

Estados Unidos se enfrenta a un brote de un coronavirus nuevo que causa una enfermedad respiratoria grave y puede ser especialmente letal para las personas mayores y aquellas con sistemas inmunológicos débiles. La Organización Mundial de la Salud ha clasificado el brote como pandemia mundial porque afecta a países de todo el mundo. Para luchar contra el coronavirus, las personas y las organizaciones pueden tomar medidas que reduzcan su transmisión, lo cual reducirá las tasas de infección y evitará que los sistemas de salud se vean desbordados. El contagio del virus ha despertado preocupación sobre la forma en que afectará la salud pública así como la economía, incluida la producción láctea.

Las granjas lecheras funcionan las 24 horas de los siete días de la semana y las operaciones no deben interrumpirse. Si se siguen las precauciones recomendadas por los Centros para el Control y la Prevención de Enfermedades (CDC) de Estados Unidos, se reducirá el riesgo para los productores lecheros, sus familias, sus empleados y los profesionales externos y proveedores de servicios esenciales presentes en las instalaciones.

Síntomas del Coronavirus

Las personas afectadas sufren síntomas respiratorios de leves a graves, fiebre, tos, falta de aliento y dificultades respiratorias. En los casos más graves, el virus produce neumonía y fallo renal, e incluso la muerte en algunos casos. Los CDC piensan que los síntomas pueden aparecer al cabo de entre dos y catorce días de la exposición al virus, aunque no todo el mundo que se ve expuesto tiene síntomas.

Medidas de Prevención para los Trabajadores de las Granjas Lecheras

Aunque actualmente no existe ninguna vacuna para prevenir el virus en los seres humanos, estos sencillos pasos pueden ayudar a reducir el contagio de este y otros virus respiratorios:

- Limitar el acceso a la explotación lechera a las personas que no sean esenciales.
- Lavarse las manos con frecuencia con agua y jabón, durante 20 segundos por lo menos. Si no se dispone de agua y jabón, se puede usar desinfectante de manos con alcohol.
- Lavarse las manos antes de comer después de trabajar en la sala de ordeño y otras áreas de la granja.
- No tocarse los ojos, la nariz ni la boca con las manos sin lavarse antes las manos.
- Evitar el contacto directo con personas enfermas, dentro y fuera de la granja.
- No salir de casa cuando se esté enfermo.
- Cubrirse la boca al toser o estornudar en un pañuelo de papel y desecharlo a continuación.
- Ponerse siempre guantes de ordeñar.
- Al regresar a casa después de trabajar en la granja, ducharse y lavar la ropa de trabajo.
- Limpiar y desinfectar los objetos y las superficies que se tocan con frecuencia. Se debe practicar el distanciamiento social, que consiste en reducir el número de contactos físicos y sociales cercanos que tenemos con otras personas, como por ejemplo cuando es necesario comprar suministros de una granja o un almacén de piensos.
Pasos a Tomar por Parte de los Empleadores

Los empleadores deben asegurarse de que el lugar de trabajo esté tan limpio como sea posible para evitar el contagio. También es importante que dejen claro que los empleados que tengan síntomas de una enfermedad potencialmente contagiosa no deben ir al trabajo mientras estén enfermos. Los empleadores deben consultar el sitio web de los CDC con regularidad para informarse sobre las últimas noticias sobre el coronavirus y tener con sus empleados conversaciones abiertas y documentadas sobre el virus y su posible impacto.

Los trabajadores de la granja no son inmunes al coronavirus. Tome medidas para protegerse y proteger a sus empleados.

1. Hable con ellos sobre el coronavirus, sobre cómo se propaga y sobre cómo evitar el contagio.
2. Imprima las hojas informativas y los carteles de los CDC, y póngalos en el lugar de trabajo y en los alojamientos de los empleados en su idioma materno.
3. Informe a los empleados sobre cómo limpiar y desinfectar sus viviendas.
   • Guía de los CDC sobre la limpieza del hogar
4. Limpie y desinfecte el lugar de trabajo. La sala de descanso y los baños de los empleados son lugares en los que el virus se puede contagiar fácilmente. Limpie y desinfecte las áreas en las que los empleados se congestionan y las cosas que tocan con frecuencia, como pueden ser los pomos de las puertas y los teclados de las computadoras. Organice horarios de limpieza diarios y semanales.
5. Facilite suministros tales como soluciones de limpieza, baldes, trapeadores, cepillos, etc., para limpiar en el trabajo y en las viviendas que proporciona el empleador a sus empleados. ([Lista de los CDC de productos de limpieza antimicrobianos aprobados])
6. Mantenga los baños y otras áreas de la granja con suficiente inventario de desinfectantes y jabón.
7. En estos momentos no deben estar en la granja las personas que no sean necesarias.
   • La visitas a la granja deben suspenderse hasta que desciendan los contagios entre personas.
   • Comuníquese por teleconferencia con los asesores que no necesiten estar presentes en la granja misma, como pueden ser nutricionistas, banqueros, agentes de crédito, personal de extensión, etc.
8. Las granjas lecheras que tengan tiendas minoristas en sus instalaciones deberán operar de acuerdo a las recomendaciones de los funcionarios de sanidad federales, estatales y locales.
9. Evalúe su política de bajas por enfermedad. Los enfermos deben quedarse en casa y solo abandonarla para recibir atención médica. ¿Ofrece baja por enfermedad pagada a sus empleados? Si no lo hace, ¿se sentirán los trabajadores obligados a ir al trabajo aunque estén enfermos?
   • Consulte las hojas informativas sobre las leyes de cada estado del Programa National Dairy FARM para informarse sobre la legislación estatal y federal sobre bajas por enfermedad pagadas.
10. Comuníque a sus empleados que deben quedarse en casa si están enfermos. Muchas veces, los empleados acuden al trabajo porque piensan que se les castigará de algún modo o se les despedirá si no van. Es importante que entiendan que su salud y la salud de los demás empleados es lo primero. Comuníque sus planes para sustituir a los trabajadores enfermos.
11. Prepare un plan de contingencias para desastres. ¿Qué haría si el 50% de sus empleados se enferman y no pueden ir a trabajar? ¿Compartirían sus recursos las granjas aledañas en caso de emergencia? ¿Quién gestionaría sus operaciones si usted u otro gerente clave no pueden salir de casa o están hospitalizados?
   • El Programa National Dairy FARM ha elaborado una guía integral para planes de acción de emergencia, que facilita información pertinente y pasos que las granjas lecheras pueden seguir si surge una emergencia.
   • Cornell tiene la red Extension Disaster Education Network que ofrece recursos de educación comunitaria durante todo el ciclo de preparación, respuesta y recuperación después de un desastre.
   • Penn State también ofrece recursos de preparación ante desastres para granjas.
**Preguntas Frecuentes**

¿Qué debe hacer el empleador de una granja lechera si un empleado tiene síntomas de COVID-19?

Según la Comisión para la Igualdad de Oportunidades en el Empleo (EEOC), enviar a casa a un empleado que tiene síntomas de una enfermedad contagiosa no infringe la ADA debido a que (1) si la enfermedad resulta relativamente leve o común (como por ejemplo, la gripe estacional), no se hubiera considerado una discapacidad cubierta desde un principio y (2) si la enfermedad resulta grave, de forma que constituiría una discapacidad al amparo de la ADA, lo más probable es que supusiera una amenaza directa, lo cual sustentaría la decisión del empleador. Se recomienda que los empleadores comuniquen claramente que tienen derecho a enviar a casa a cualquier empleado que tenga síntomas de una enfermedad potencialmente contagiosa.

Si un empleador o empleado de una granja lechera muestra los síntomas del COVID-19, ¿cómo puede hacerse una prueba?

Si piensa que usted o uno de sus empleados se han visto expuestos al COVID-19 y tienen fiebre o síntomas tales como tos o dificultades respiratorias, consulte con un profesional médico.

¿Qué se debe hacer si un empleado da positivo por el COVID-19?

Si un empleado o persona que esté trabajando o haya estado presente recientemente en sus instalaciones da positivo por el COVID-19 en una prueba confirmada por un laboratorio, avise de inmediato a su departamento de salud local. Asegúrese de que todas las superficies y áreas expuestas se limpien y desinfecten inmediatamente.

Su departamento de salud local se encargará de supervisar al empleado o persona mientras tenga síntomas y esté en aislamiento hasta que se recupere. Es posible que las autoridades recomienden que sus compañeros de trabajo se hagan las pruebas. También se encargarán de dar autorización a los empleados recuperados para que puedan salir del aislamiento antes de regresar al trabajo. El departamento de salud local puede orientarle sobre cómo supervisar y separar a los empleados que hayan tenido un contacto estrecho con las personas que han dado positivo.

¿Tienen inmunidad ante el COVID-19 las personas que han estado expuestas al coronavirus bovino?


**Referencias**


