

COVID-19 WORKPLACE SAFETY



Guide to implementing best practices and requirements






- Updated June 10, 2020 -

On May 18, 2020, Governor Baker announced a new set of mandatory workplace safety standards that apply to all businesses that are open in Massachusetts. As of May 25, you must have a written COVID-19 control plan in place outlining how you will prevent the spread of COVID-19 in the workplace, you must publicly display a sign attesting to the steps you have taken to prevent COVID-19 spread, and you must display posters at your business regarding the standards.


Use the following checklist to ensure that you are meeting these workplace safety standards, in addition to other state and federal guidance specifically for agricultural employers, and other best practices for workplace safety. Asterisks indicate key legal requirements. We also include tips below on how to implement guidance and standards.

Note that this guide is designed to help farmers ensure that they are adhering to applicable guidance and standards, but it is not a legal document and is not exhaustive, and the responsibility for employee health and safety lies with you, the employer. We hope that this guide will help you make informed business decisions.

General business requirements

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 * We have developed a written COVID-19 Control Plan using this template as a guide. This plan is being kept on the premises and will be made available in the case of an inspection or outbreak.
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 * We have printed and signed this poster affirming that we have completed a COVID-19 control plan and are displaying it in one or more areas on the business premises where it is visible to employees, customers, and visitors.
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 * We are displaying signs and posters describing the rules for maintaining social distancing, hygiene protocols, cleaning, and disinfecting. These posters include –
 - This poster reminding managers about the rules (available in Spanish here).
 - This poster informing employees about the rules (available in Spanish here).
 - This poster about how to stop germ spread (available in many languages here).

Employee training and communication

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 * We provide training for all employees regarding social distancing and hygiene protocols. We use signage, verbal reinforcement, and monitoring to ensure protocols are adopted.

TIP: Use this guidance from the CDC to help you train your employees in how and when to wash their hands. In addition to the signs above, consider using other signs in prominent locations. Some sample signs include: this series of signs from MDAR for workers and customers - in English and Spanish; these handwashing signs from the MA DPH - in English and Spanish - or the CDC - in English and Spanish; and this cover-your-cough sign from the WHO - in English and Spanish.
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 * We have trained our employees to recognize the common symptoms of COVID-19.

TIP: See the CDC's list of symptoms here and their poster showing symptoms here in English and in other languages here.

Employee training and communication (cont.)

- ✦ We have informed all our employees of their rights to paid sick leave and expanded family and medical leave under the Families First Coronavirus Response Act, and we are displaying [this poster](#) prominently in the workplace (see posters available in Spanish, Russian, and other languages [here](#)).
- We have trained our employees on the proper construction, usage, storage and laundering of face coverings (see CDC guidance [here](#)).
- Our employees are aware of the steps we have taken to ensure a safe workplace.
- We actively encourage employee input, and we provide clear avenues for employees to share their suggestions and express needs with regard to workplace safety.

Social distancing

- ✦ We have established protocols to ensure that employees can practice adequate social distancing (staying 6+ feet apart whenever possible, and limiting duration of contact).
- ✦ We ensure that all persons, including employees, customers, and visitors remain at least six feet apart to the greatest extent possible, both inside and outside workplaces.
- ✦ We have provided signage to ensure employees maintain safe social distancing (e.g. one such sign from MDAR is on page 12 of [this sign series](#)).
- ✦ We require everyone on the farm to wear face coverings at all times and we monitor their use. We provide appropriate face coverings to employees as needed and ensure that reusable cloth face coverings are changed or laundered daily.

TIP: See MA Department of Public Health [guidance on mask wearing here](#), and see [this page](#) for a list of vendors supplying masks as well as other PPE and other COVID supplies.

- We restrict visitors' access to the farm. Visitors who must visit the farm are reminded of social distancing requirements, have limited access to farm areas where staff are working, and follow the same hygiene protocols as workers.

TIP: MDAR advises farms to keep a log of visitors to the farm, in addition to tracking worker shifts and hours. A visitor log can help you track exposure in case a worker or visitor becomes ill.

- Whenever possible, we avoid having staff travel together in the same vehicle, we seat employees 6' apart, and transport workers residing together in the same vehicle. We've assessed other ways to improve transportation safety (see guidance from [NY](#) and [MA](#)).
- We have installed physical partitions if appropriate – e.g. between indoor work stations or at customer checkout areas – to provide extra protection for employees.
- We stagger breaks as needed and set up break areas to support social distancing. We've considered creating teams of employees who always work together in the same shifts.

Cleaning, disinfecting, and employee hygiene

- ✦ We have provided hand washing capabilities throughout the workplace.

TIP: See resources for creating DIY handwashing stations [here](#) and [here](#). Single use towels and trash bins should always be provided. Hand sanitizer containing at least 60% alcohol should be provided when soap and water are not available, but note that it is ineffective when hands are visibly soiled and should not be used as a replacement for hand washing.

- ✦ We ensure frequent hand washing by employees and ensure adequate supplies for this.

To minimize high touch areas, we have limited shared use of things like phones, hand tools, and farm vehicles to the greatest extent that is practical.

We understand [the different roles of cleaning, sanitizing, and disinfecting](#) on the farm, and we have reviewed CDC guidance on [how to clean and disinfect facilities](#). We feel equipped with the necessary information to effectively implement recommended procedures to prevent the spread of COVID-19 on the farm.

- ✦ We have established cleaning protocols specific to our business and are regularly implementing them.

- ✦ We have a system in place for regularly sanitizing high touch areas throughout the workplace, such as workstations, equipment, doorknobs, handles, and restrooms.

- ✦ We are disinfecting all common surfaces at intervals appropriate to our workplace.

- ✦ When an active employee is diagnosed with COVID-19, proper cleaning and disinfecting will be performed based on CDC guidance (after closing off area for 24 hours if possible).

If gloves are used on the farm, we have a glove use policy in place to ensure gloves are maintained in adequate sanitary condition, and employees are trained in their proper use.

TIP: Note that only single-use gloves should be used to prevent the spread of coronavirus. Workers should wash hands before putting on gloves, follow [CDC guidelines](#) for removing gloves, and avoid touching their face or any other dirty surface with gloves on. Single-use gloves must be worn by PYO and farmers' market staff, but are optional for all others.

Managing sick employees

- ✦ We have policies/systems in place to ensure that employees who are displaying COVID-like symptoms do not report to work.

TIP: These policies should include things like:

- Training workers in sick leave availability and the requirement that they stay home if sick
- Screening workers for symptoms before each shift, verbally and/or with temperature checks
- Offering flexible leave policies and/or opportunities to do work from home if possible

We have considered screening workers for COVID-19 symptoms before starting each shift; and we ensure that any such screening is implemented consistently and uniformly.

TIP: Employers are advised to ask each worker at the start of their shift if they have felt feverish or experienced unusual coughing, shortness of breath, headaches, chills, sore throat, muscle aches or pains, or new loss of taste or smell; employers can also ask employees to self-administer a temperature check prior to beginning each shift and stay home if they have a fever over 100 degrees F (and/or any other symptoms). A screening process of this kind is mandatory for farm labor camps.

Managing sick employees (cont.)

- ✱ We have established a plan for employees getting ill from COVID-19 at work.

TIP: Consider the following when developing your plan:

- You should ensure that employees know they should promptly notify management and leave work immediately if they develop any symptoms of COVID-19.
- You should create contingency plans that will ensure quick isolation of anyone with symptoms and minimize work disruptions as much as possible if any of your employees – or you – should have to leave work unexpectedly.
- You should notify your board of health of any confirmed COVID-19 cases, work with them to trace likely contacts in the workplace, and advise such contacts to isolate and self-quarantine (while being careful to maintain the confidentiality of any sick employees).

- ✱ We have established a return-to-work plan for sick or quarantined employees.

TIP: It is important to incorporate the latest [CDC guidance](#) for how to determine when it is safe for sick or quarantined employees to return to work. The CDC recommends several different protocols to follow depending on whether employees are symptomatic or asymptomatic, and whether or not there is access to testing. Generally speaking, employees may return to work when the following circumstances have been met:

- For symptomatic employees:
 - At least 10 days have passed since symptoms first appeared, AND
 - At least 72 hours have passed without fever and with respiratory symptoms improving,
 - PLUS, if testing is available, at least two FDA-approved tests >24 hours apart should give negative results.
- For employees who tested positive for COVID-19 but never developed symptoms:
 - At least 10 days have passed since the date of their first positive COVID-19 test, OR
 - At least two FDA-approved tests >24 hours apart should give negative results.

We follow CDC recommendations in the case of employees who have had close contact (i.e. within 6 feet for 15+ minutes) with someone with suspected or confirmed COVID-19.

TIP: For workers who are not essential that have been in close contact with a COVID-19 patient, the CDC generally recommends quarantining for 14 days after exposure. The CDC allows exceptions to ensure continuity of essential work, however. Essential workers may be permitted to return to work, provided that you measure the employee's temperature and assess their symptoms before they start each shift (ideally before they enter the facility), ensure that they leave work immediately if any symptoms appear, and are following other [CDC guidance here](#). See [this page](#) for a list of vendors supplying thermometers as well as other COVID supplies.

Managing at-risk employees

The MA "Safer-at-Home Advisory," issued May 18, 2020, advises at-risk employees who are over the age of 65 or have underlying health conditions to continue to stay at home and consider not returning to work. Note that employers of at-risk employees should take special precautions to ensure that the workplace is as safe as possible for these employees, while also ensuring that they don't discriminate against employees in any way based on age or disability.

We proactively communicate with workers to assure them that they won't be penalized for seeking accommodations or communicating with management about their needs.

- ✱ We engage in interactive dialogue with at-risk workers when they ask for workplace accommodations.

Managing at-risk employees (cont.)

- Workers at higher risk for severe illness are encouraged to self-identify and are given confidential avenues for doing so. We are careful not to make unnecessary medical inquiries about employees' health.
- We have considered the [CDC's interim guidance for employers of at-risk employees](#), and are implementing it to the extent that is possible and appropriate in our workplace.
- We ensure that at-risk workers are not treated negatively by managers or co-workers.
- We allow at-risk workers to choose what risks they want to take in the workplace. We don't prevent these employees from working or require them to work different tasks based on their age or health risks.
- At-risk workers are given priority for workplace accommodations.

TIP: You should engage in dialogue with at-risk workers to see if there are reasonable accommodations you can make to meet their needs and increase their safety. For example, consider preferentially offering workers in these groups accommodations like:

- Opportunities to take extended leave
- Opportunities to do some or all of their work from home, if possible
- Lower risk work assignments (e.g. working alone or in an outdoor or well-ventilated space)
- Extra safety protections requested by an employee (e.g. separate eating spaces, gloves, or hand sanitizer)

Managing farm employee housing

- Beds in farm employee housing are spaced as far apart as possible (6 feet minimum) and if multiple beds are in one room, they are oriented so that workers sleep head to toe.
- All rooms are well-ventilated, with windows and doors that open and screens that fit.
- We have developed a regular daily and weekly schedule for cleaning – with a focus on sanitizing high-touch areas. We have designated a specific individual to manage cleaning.
- We have a plan in place for housing in case any workers display COVID-19 symptoms.

TIP: This plan must allow sick workers to isolate from others. You should have designated areas for quarantined employees - with separate rooms at a minimum, and separate sleeping, cooking, and bathing facilities whenever possible. The plan should ensure quarantined workers avoid common areas and have access to sufficient food, supplies, and medical care. The plan should also provide for a deep cleaning of the housing unit based on [CDC guidance](#) if a worker has COVID-19.

If you would like to walk through this checklist with CISA staff and discuss specific considerations and decisions related to your farm's workplace safety practices, please contact Kristen Wilmer at kristen@buylocalfood.org (email preferred) or (413) 665-7100, ext. 12.