Section 2: Control Plan

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 is based on guidance from the CDC and US DOL (https://bit.ly/covid-ag-cdc-dol). *Disclaimer*: Checklist is for reference only and does not guarantee compliance with state or local regulations.



SCREENING & MONITORING WORKERS

Develop uniform policies and procedures for screening workers for COVID-19 signs and symptoms.

- [ ] 1. Screen workers before they enter the worksite or, if possible, before they board shared transportation.
- [ ] 2. Conduct verbal screenings to check for symptoms workers' preferred languages.

  https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html
- [ ] 3. Check workers' temperatures at the beginning of each shift, identifying anyone with a fever of 100.4°F or greater.
- [ ] 4. Do not let workers who indicated having symptoms or who have a fever of 100.4°F or greater enter the workplace.
- [ ] 5. Encourage workers to report symptoms immediately, when on site.

Encourage workers who have symptoms to self-isolate and contact a healthcare provider.

- [ ] 1. Provide symptomatic workers with access to direct medical care or telemedicine, when appropriate.

  https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/end-home-isolation.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprevent-getting-sick%2Fwhen-its-safe.html
- [ ] 2. Coordinate any recommended diagnostic testing with the occupational medicine provider or state and local health officials.
- [ ] 3. Provide workers with information on when it is safe to return to work and the operation's return-to-work policies and procedures.

  https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/end-home-isolation.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprevent-getting-sick%2Fwhen-its-safe.html

- [ ] 4. Inform human resources, health unit (if in place), and supervisor so symptomatic worker can be moved off schedule and replacement assigned.

Ensure personnel performing screening activities are protected.

- [ ] 1. Train temperature screeners to use temperature monitors according to manufacturer instructions.
- [ ] 2. Provide temperature monitors that are accurate under conditions of use (e.g., extreme hot or cold weather).
- [ ] 3. Use social distancing, barrier or partition controls, and personal protective equipment (PPE) to protect screeners.
- [ ] 4. Provide appropriate PPE to screeners who must be within 6 feet of workers, including gloves, gown, face shield, and face mask (at minimum).
  https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-faq.html
- [ ] 5. Train workers how to properly put on, take off, and dispose of all PPE.

MANAGING SICK WORKERS

Monitor and manage sick workers.

- [ ] 1. Immediately separate workers who appear to have symptoms from others in the workplace.
  https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html
- [ ] 2. Have a procedure for safe transport of a sick worker to housing or a healthcare facility.
- [ ] 3. House sick workers who can't be isolated in their existing housing arrangement in alternative housing arrangements under quarantine away from other workers.
- [ ] 4. Ensure sick workers avoid contact with animals, including livestock and pets.
- [ ] 5. Provide sick workers with information on when and how to access medical attention (e.g., the Health Resources and Services Administration (HRSA) website).
  https://findahealthcenter.hrsa.gov/
- [ ] 6. Provide sick workers with information on the operation's return to work policies and procedures.
  https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html

Protect personnel who are managing sick workers.

- [ ] 1. 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).

  https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-faq.html
- [ ] 2. Train them to properly put on, take off, and dispose of PPE.

Develop an action plan for suspected/confirmed cases.

- [ ] 1. 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.

- [ ] 2. Clean and disinfect the work area, equipment, common areas, and tools the sick worker used.
https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html

- [ ] 3. If there is a sick worker in employer-furnished housing:
  - [ ] 3.1. Provide a dedicated space for the worker to recover, away from others.
  - [ ] 3.2. Clean and disinfect living quarters, cooking and eating areas, bathrooms, laundry facilities.
  - [ ] 3.3. Do not allow other workers to use shared areas until after they are cleaned and disinfected.

- [ ] 4. Provide a sick worker going to a home in the community with guidance to mitigate the risk of transmission in the home.
https://www.cdc.gov/coronavirus/2019-ncov/downloads/living-in-close-quarters.pdf

- [ ] 5. Work with state, tribal, local, and territorial (STLT) health officials to identify other exposed individuals.

- [ ] 6. Consult with STLT officials for guidance on testing and workplace contact tracing.
https://www.cdc.gov/coronavirus/2019-ncov/php/open-america/contact-tracing.html

- [ ] 7. Ensure on-site healthcare personnel follow appropriate CDC and OSHA guidance for healthcare and emergency response personnel.
https://www.cdc.gov/coronavirus/2019-nCoV/hcp/

ADDRESSING RETURN TO WORK AFTER WORKER EXPOSURE TO COVID-19

Plan for workers returning to work after having or being exposed to COVID-19.

- [ ] 1. Follow CDC's Critical Infrastructure Guidance for workers who have had a COVID-19 exposure but do not have symptoms.
https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html

- [ ] 2. Implement strategies from CDC's COVID-19 Critical Infrastructure Sector Response Planning to manage continuation of work while protecting the health of workers and the public.
https://www.cdc.gov/coronavirus/2019-ncov/community/critical-infrastructure-sectors.html

- [ ] 3. Follow the CDC interim guidance Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings for COVID-19 positive workers returning to work.
https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html

- [ ] 4. 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.

ENGINEERING CONTROLS

- [ ] 1. Assess and identify opportunities to limit close contact (less than 6 feet) between all individuals at the workplace.

- [ ] 2. Adjust workflow to allow for a 6-foot distance between workers.

- [ ] 3. Install shields or barriers between workers when a 6-foot distance is not possible.

- [ ] 4. Add additional (touch-free, if possible) time clock stations or allow more time to clock in/out to reduce crowding.

- [ ] 5. Remove or rearrange chairs or add visual cues in break areas to support social distancing.
- [ ] 6. Train workers to follow protective measures while on breaks.

CLEANING, DISINFECTION, & SANITATION

Facilitate hand hygiene.

- [ ] 1. Encourage workers to wash their hands often with soap and water for at least 20 seconds.
  https://www.cdc.gov/handwashing/when-how-handwashing.html
- [ ] 2. Provide access to permanent and/or temporary hand washing facilities equipped with soap, clean water, and clean, single-use towels.
- [ ] 3. Increase the number of hand washing stations.
- [ ] 4. When soap and water are not immediately available, provide access to temporary stations equipped with hand sanitizer containing at least 60% alcohol.
- [ ] 5. Place sanitizing stations in multiple locations including entry/exit and time clock station(s).
- [ ] 6. If possible, provide workers with individual containers of hand sanitizer for use in field settings.

Conduct disinfection and sanitation.

- [ ] 1. Develop sanitation protocols for daily cleaning and sanitation of work sites, where feasible.

  https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html
- [ ] 2. Develop cleaning and disinfecting procedures for high-touch areas such as tools, equipment, and vehicles, following CDC guidance on cleaning methods.

  https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html
  - [ ] 2.1. Follow cleaning product manufacturers' contact time recommendations.
  - [ ] 2.2. Keep cleaning chemicals and hand sanitizer out of reach of children.
  - [ ] 2.3. Choose disinfectants or alternative cleaning methods (e.g., soap and water) for surfaces with which food comes into contact.
- [ ] 3. Obtain additional information from EPA on cleaning and disinfecting workplaces.

  https://www.epa.gov/coronavirus/guidance-cleaning-and-disinfecting-public-spaces-workplaces-businesses-schools-and-homes
- [ ] 4. Conduct targeted and more frequent cleaning and disinfecting of high-touch areas (e.g., time clocks, bathroom fixtures, vending machines, railings, door handles).
  https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html
  - [ ] 4.1. Clean and disinfect break areas daily and between each group.
  - [ ] 4.2. Clean and disinfect locker rooms after each shift.
  - [ ] 4.3. Provide disposable disinfectant wipes to frequently clean commonly touched surfaces.

- [ ] 4.4. Refer to the Transportation Section (below) for guidance on sanitizing farm vehicles.
- [ ] 5. Prevent or limit sharing of tools, where possible.
- [ ] 6. Clean and disinfect shared tools between each worker use.
- [ ] 7. If cleaning tools after each use is not possible, conduct daily targeted and more frequent cleaning of tools.
- [ ] 8. Dispose of all cleaning material and PPE in compliance with OSHA standards.
  https://www.osha.gov/SLTC/covid-19/standards.html

ADMINISTRATIVE CONTROLS

Conduct training that is easy to understand, in preferred languages, and at appropriate literacy level. Provide accurate and timely information to workers about:

- [ ] 1. Signs and symptoms of COVID-19, how it spreads, risks for workplace exposures, and how workers can protect themselves.
- [ ] 2. Proper handwashing and use of hand sanitizer
  https://www.cdc.gov/handwashing/index.html
- [ ] 3. Farm-specific social distancing practices
- [ ] 4. Cough and sneeze etiquette
  https://www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html
- [ ] 5. Putting on and taking off masks and gloves
- [ ] 6. General social distancing measures
- [ ] 7. What to do if you are sick
- [ ] 8. Employer policies regarding COVID-19 (e.g., disinfection protocols, housing and worker isolation, sick leave polities)
- [ ] 9. How workers should alert their supervisors if they have signs or symptoms of COVID-19 or recent close contact with a confirmed or suspected COVID-19 case.
- [ ] 10. Place posters, in all preferred languages, at entrances and in break areas to reinforce training.
  https://www.cdc.gov/coronavirus/2019-ncov/communication/print-resources.html

Review leave and sick leave policies.

- [ ] 1. Modify policies to ensure ill workers can stay home and are not punished for taking sick leave.
- [ ] 2. Ensure workers are aware of and understand sick leave policies.
- [ ] 3. Modify incentive policies so workers are not penalized for taking sick leave if they have COVID-19.
- [ ] 4. Consider leave flexibility including advances on future sick leave or allowing workers to donate sick leave to each other.

Promote social distancing.

- [ ] 1. Reduce crew sizes.
- [ ] 2. Stagger work shifts, mealtimes, and break times.
- [ ] 3. Have farmworkers work in alternate rows in fields to keep at least a 6-foot distance from other workers.
- [ ] 4. Place materials and produce at a central transfer point instead of transferring directly from one worker to the next.
- [ ] 5. Consider grouping healthy workers together into cohorts that include the same workers each day.
- [ ] 6. Ensure workers who are in the same shared housing unit follow the Households Living in Close Quarters Guidance.
  https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/living-in-close-quarters.html
- [ ] 7. Conduct training outside and in smaller groups, with participants spaced 6 feet apart.

CDC recommends wearing cloth face coverings as a protective measure in addition to social distancing. 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:

https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html

- [ ] 1. Fit over the nose and mouth and fit snugly but comfortably against the side of the face
- [ ] 2. Are secured with ties or ear loops
- [ ] 3. Include multiple layers of fabric
- [ ] 4. Allow for breathing without restriction (and are not worn by anyone with trouble breathing)
- [ ] 5. Can be put on and removed by the wearer without help
- [ ] 6. Do not lead to heat-related illness (OSHA's Heat page offers tips on water and rest breaks)
  http://www.osha.gov/heat
- [ ] 7. 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)
- [ ] 8. Are not used if they become wet or contaminated
- [ ] 9. Are replaced with clean replacements, provided by employer, as needed
- [ ] 10. Are not shared among workers unless adequately laundered between uses
- [ ] 11. Are handled as little as possible to prevent transferring infectious materials to the cloth
- [ ] 12. Are not worn with or instead of respiratory protection when respirators are needed
  https://www.osha.gov/SLTC/respiratoryprotection/

PERSONAL PROTECTIVE EQUIPMENT

Identify and provide necessary PPE.

https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirator-use-faq.html

- [ ] 1. Consider allowing voluntary use of filtering facepiece respirators even if respirators are not normally required.
  - [ ] 1.1. Ensure workers comply with the voluntary use provisions of the OSHA Respiratory Protection standard (29 CFR 1910.134).
    https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134
  - [ ] 1.2. Adjust water availability and frequency of breaks as appropriate whenever workers are at risk of heat-related illness.
- [ ] 2. Ensure workers performing cleaning and disinfecting are provided with appropriate PPE based on information from Safety Data Sheets.

Provide training (that is easy to understand, in preferred languages, and at appropriate literacy level) on the proper use of PPE.

- [ ] 1. Use videos or in-person visual demonstrations.
  https://www.youtube.com/watch?v=oU4stQgCtV8
- [ ] 2. Keep workers at least 6 feet apart during demonstrations.
- [ ] 3. Training should include the following:
  - [ ] 3.1. When to use PPE and what PPE is necessary
  - [ ] 3.2. How to properly put on and take off PPE
  - [ ] 3.3. How to properly dispose of disposable PPE
  - [ ] 3.4. How to properly clean and disinfect reusable PPE
  - [ ] 3.5. Reminder to change PPE if it is torn, dirty, or otherwise damaged
    https://www.cdc.gov/handwashing/when-how-handwashing.html
  - [ ] 3.6. Reminder to wash hands with soap and water for 20 seconds or use alcohol-based hand sanitizer containing at least 60% alcohol after removing PPE
    https://www.cdc.gov/handwashing/when-how-handwashing.html
- [ ] 4. Allow workers to continue wearing gloves they would normally wear while doing fieldwork.

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