ILLINOIS MANUFACTURER RETURN TO WORK & RECOVERY GUIDE MITIGATION PLAN POST COVID-19 MAY 2020 - V3





Notice from IMEC	3
Legal Disclaimer	4
Purpose	5
Physical Distance in the Workplace	6
Workplace Surfaces	7
Breakrooms and Common Areas	8
HealthMonitoring	9
On-SiteTesting	9
Containment and Facility Access	10
Appendix A	11

Notice from IMEC

IMEC is a team of improvement specialists dedicated to providing organizations in Illinois with the tools and techniques to create sustainable competitive futures. The experienced hands-on team at IMEC works closely with its clients to plan critical business improvements in the areas of Leadership, Strategy, Customer Engagement, Operations, and Workforce.

With more than 50 full-time staff and partners positioned statewide, IMEC delivers the local expertise to not only plan and strategize, but to implement and evaluate the effectiveness of client improvements. In fact, IMEC assists more than 700 companies each year with successful business improvement projects.

As a result, IMEC has demonstrated a return on investment that exceeds 19:1. This is made possible as organizations become more effective and efficient – and together with IMEC – excel toward enterprise excellence.

MEP National Network

As a NIST MEP approved Center, IMEC is the official representative of the MEP National Network in Illinois. The MEP National Network is a unique public-private partnership that delivers comprehensive, proven solutions to U.S. manufacturers, fueling growth and advancing U.S. manufacturing.

In an effort to provide extended support of Small & Mid-Sized Manufacturers, this guide has been developed to help assist manufacturers to return to work and recover - as you maintain, resume all, or restart operations. This plan is based upon the COVID-19 Best Practices, as recommended by the Centers for Disease Control & Prevention (CDC), the Occupational Safety & Health Administration (OSHA), The Illinois Department of Health, and other Governmental Regulations & Guidelines as described in this document.

This plan is available to any and all that seek direction on employees return to work and the resumption of 100% operations. In addition, IMEC Staff will be made available to answer any questions remotely within their areas of expertise. Other key resources will be made available to support individual corporations with the development of a customized plan.

For questions regarding this document, please contact us at – 888-806-4632 or by submitting questions to <u>www.</u> <u>imec.org/helpline</u>.





The purpose of this document is to recommend/suggest ideas that you may wish to consider as our Industry and your Business moves towards 100% reopening in the aftermath of the COVID-19 pandemic.

Keep in mind that there is no 'one size fits all' scenario.

Before you chose to implement **any** of the ideas suggested in this document you must evaluate and determine, with the assistance of your legal counsel, accounting and human resource teams, the legality and effectiveness of the potential application captured in this document.

As the overall intent of this document is to provide suggested ideas for your independent consideration only, IMEC accepts no responsibility for any result or circumstance arising from or related to your decision to 'use or not use' any idea submitted herein.

This is to be considered a 'living' document which is subject to revision or further developments as they arise.

This document was pulled together to provide resources available during this uncertain time. It is important that you take a look at your business and needs specifically. Should you need further assistance, IMEC specialists are available for consulting.



These are unprecedented times and they require a more formal approach to hazard assessment and work practices than you may have had in the past. The purpose of this guide is to help you perform a hazard assessment of your workplace following the operational slow downs and shelter in place orders due to the COVID-19 crisis.

As you return your workplace to reopen and to higher levels of production, continue to refer to state and local authorities for any specific requirements they put into place for your community. If you cannot find any requirements or guidelines, the overlying principle should be to provide a safe work area for your employees.

Another good resource for much more detailed planning information is currently in development through the National Safety Council.<u>https://www.nsc.org/work-safety/safety-topics/safe-actions-for-employee-returns-safer</u>. They have issued their first framework document and you can sign up to receive regular updates.

Here are some things to consider as you get started:

- Involve as many employees as possible when you assess hazards and create new modes of working. If you operate a large facility, consider creating smaller teams, each one focused on a certain zone of the facility. A smaller organization may be able to address the entire facility with one team.
- Provide a means for ongoing suggestions and responses. You will be learning as you go, so you want to make sure employees feel like their suggestions are welcome and they see how you address each suggestion. Perhaps you post a white board in a central location or perhaps you use monitors throughout your facility. Just make sure your feedback is timely and updated regularly.
- Document the existing protocols and new measures that you establish, even if it is a simple bulleted list of
 requirements. This documentation will help you assess how these new protocols are working and will make it
 easy for you to adjust and standardize as your learning progresses. It will also allow you to refer back to your
 standards, should someone in your facility experience an infection. Publish them in easy to access locations so
 employees can review them.
- Regularly consult with the CDC <u>https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-</u> response.html and your local and state health department websites to maintain awareness of any new information that becomes available as the situation evolves.
- As you ramp up production, you may want to test your new policies and procedures with smaller groups of workers prior to calling back the entire workforce.
- As you create these changes in your workplace be sure to provide adequate training for supervisors and the rest of the workforce. This is a good time to practice monitoring or regular audits to make sure employees understand and abide by all the new rules and work processes. You should also consider posting signs around your facility to remind employees of your new practices and procedures.

Contingency Planning Considerations

If you do not yet have one, you should create contingency plan procedures and document them. Thinking through worst cases now, and what you will do if they occur, will allow you and your team to be able to respond quickly and minimize the effects on your employees and your business. You will most likely not be able to anticipate every

possible situation, so create a framework that will help guide your decision-making during the crisis. Consider the following:

- Establish an overall contingency plan owner responsible for updating and communicating the plan. Then, for each action, establish an owner who has both the responsibility and authority to take the actions defined in the plan.
- Work with a team of employees to brainstorm possible scenarios. Your list may be long, but it is quite likely that the actions you take will be able to be grouped into categories. Think about possibilities such as high absentee rates, identify employees that have critical skills and what you would do if they fall ill, what happens when someone falls ill while at work, what happens if someone reports they have tested positive for COVID-19, etc.
- If an employee falls ill at work or reports they have tested positive, determine how you will trace their contact with people and equipment for at least 2 days prior to the sick person last being at work. Then, you will need to determine how to notify other employees while still maintaining the confidentiality of the sick employee.
- Consider cleaning and sanitizing protocols for the employee work cell, common areas and/or the entire facility should someone contract the virus.
- Determine how you will handle other employees that came in contact with the sick employee will you monitor them daily or require them to self-quarantine?
- If a worker reports that they have been exposed to another person that has contracted COVID-19, you should determine how you will handle them. The CDC provides this guidance for critical workers, that may help guide you with other workers, as well. <u>https://www.cdc.gov/coronavirus/2019-ncov/downloads/critical-workersimplementing-safety-practices.pdf</u>
- If a worker does contract the virus or if they exhibit symptoms and self-isolate, establish protocol for their return. Do they need to quarantine for a certain number of days, will you require a temperature check before they enter the facility, etc?

Physical Distance in the Workplace

Creating physical space between employees of at least 6 feet is recommended to help prevent the spread of the virus. The following are suggestions on how to accomplish this:

- Reconfigure workstations to allow employees to work at least 6 feet from one another. You may need to install communication boards or other visual tools that allow you to get information from a distance or use a technological solution.
- Evaluate employee roles and responsibilities and determine how to re-assign work so that employees do not need to travel into and out of their work cells.
- Assign employees to zones and set up work enabling employees to stay in their work zones without having to walk into other departments or zones.
- Mark off spaces on the floor with tape or paint to note where employees should stand or sit. This is
 particularly important in shared work cells, breakrooms, bathrooms, conference rooms, printer and copier
 rooms and any other common areas.
- Allow employees to sit facing only one direction in the breakrooms. Do not allow employees to sit across from one another.
- Alternate working hours and stagger shifts, if possible, to allow for more space and less contact between workers.

- Implement one-way aisles and separate doors for entering and exiting rooms, if possible.
- Discourage physical contact such as handshakes.
- Establish maximum gathering sizes, even with 6 feet distancing.
- Continue to allow remote working and identify any additional jobs that could be done remotely.
- Discourage employees from congregating in parking lots and in smoking areas.
- Improving ventilation in your facility may help prevent transmission. Just make sure fans are not blowing directly toward employees at this time.

If you are unable to ensure employees are able to maintain a distance of 6 feet from one another throughout the day, then you must find other means to protect employees. Here are some ways you could accomplish this:

- Provide face coverings for those employees not able to maintain appropriate distance. See Appendix A for information that may help you decide what face covering is best for your workplace.
- Provide an impermeable barrier, such as a plastic guard between workers who work in close proximity.
- Modify shifts and work schedules so there are fewer employees in your shop at one time.

Workplace Surfaces

It is important to identify the surfaces that employees touch on a regular basis. This includes doorknobs, computers, phones, copiers, faucets, etc. There are two primary responsibilities employees have that will help minimize transmission via these surfaces:

- Wash hands regularly! Wash with soap and water for at least 20 seconds after contact with a surface. If soap and water is not available make sure employees have access to hand sanitizer with at least a 60% concentration of alcohol. Rub it on your hands and let it air dry.
- Encourage employees to avoid touching their face.

You may want to install added hand sanitizer stations throughout your facility for ease of employee access.

Many enterprises still use paper files, travelers, work orders, etc. that are handed from person to person. If you continue to use them, identify ways to minimize handing them off from one person to another. If you do need to hand them off between people, use plastic sleeves for each page so employees can view the information and clean the plastic between hand-offs. As quickly as possible, work to identify new means of information transfer that minimize or eliminate use of these travelling paper documents.

Beside washing hands frequently, there are other things you can implement to minimize transmission from common surfaces. Implement regular cleaning and disinfecting of these surfaces

- Use EPA recommended cleaners.
- Obtain SDS sheets and discuss hazards and needed PPE with employees that will be using these chemicals.
- Provide appropriate PPE and training on how to use the PPE for the level of risk of exposure. See OSHA's guidance booklet: <u>https://www.osha.gov/Publications/OSHA3990.pdf</u>
- Provide wipes and cleaners appropriate for the surfaces and devices that need to be cleaned. Make sure you
 understand how these chemicals might affect electronic devices or any materials you have in your facility.
 Use the appropriate cleaning agents that will not damage your equipment or products.
- Create a standard schedule for cleaning and sanitizing. The cleaning frequency should be based on the risks throughout your facility. Table 1 provides an example of a cleaning schedule.

- Maintain a log of your cleaning. Should an employee become infected, this log may provide data that will help you understand who else may have been exposed.
- If you use an outside service to clean and disinfect your facility, discuss their cleaning standards, make sure you know the chemicals they are using and their cleaning methods, and ensure they are using the appropriate PPE for the job.
- If you are using internal employees to perform some or all of the cleaning and disinfecting make sure they
 are given the appropriate PPE and are educated on the hazards associated with the chemicals they are using.
 Refer to the Safety Data Sheets. Refer to CDC or local health authority guidance on how to clean and disinfect
 a variety of surfaces: https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.

- Although it is not believed that COVID-19 is transferred through the blood, you may want to refer to OSHA's bloodborne pathogens standard to obtain ideas on how to safely handle potentially contaminated materials: https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030
- If employees can avoid sharing tools or equipment that is best. If not, establish a protocol for handling the transition between each employee contact.
 Table 1

Frequency of Contact	Surface Type	Cleaning Frequency
HIGH	Doorknobs to restrooms,	Every 2 hours
	entrances, breakrooms	
HIGH	All restroom fixtures and stalls	Every 2 hours
HIGH	Water fountain handles	Every 2 hours
HIGH	Shared computer workstations	Every 2 hours
MEDIUM	Tables, appliances, cabinets in	After each break
	<mark>breakroom</mark>	
MEDIUM	Forklifts, pallet jacks	Every 4 hours
MEDIUM	Hand tools	After each use
LOW	Doorknobs to individual offices	Daily
LOW	Individual computers, phones,	Daily
	keyboards, cell phones	

Breakrooms and Common Areas

- Encourage employees to bring in cold lunches that do not need to be reheated in order to discourage use of microwaves.
- Encourage employees to use ice packs in their lunch containers to discourage use of refrigerators.
- Encourage employees to bring in their own utensils and napkins. If you do provide utensils, cups, plates or napkins, make sure they are disposable.
- Mark areas on the floor or benches to indicate where seating is allowed. Have all seating face one direction.
- Stagger breaks in order to reduce the number of employees that are allowed in the breakroom.
- Do not allow employees to bring gloves or face coverings into the breakroom. Provide a proper means for disposal or storage while employees are inside the room.
- Require employees wash their hands with soap and water for at least 20 seconds before going on break.
- Provide sanitizing wipes in the common areas and require that employees use them before and after touching surfaces (copier buttons, vending machine buttons, cabinets, etc).

Health Monitoring

You may determine that you will need to implement some form of health monitoring on a regular basis. This is a good practice. It is important to keep records; however, make sure that any health records are kept separate from employee work records and that the records are secured in order to provide privacy for your employees. In your screening you may want to consider pre-existing conditions, such as seasonal allergies. If someone forgets to take their allergy medication, they may exhibit similar symptoms to COVID-19.

At a minimum, you should consider implementing a checklist or questionnaire for employees to complete upon entering your facility. Use questions such as:

- Have you travelled to another city or jurisdiction where you may have been exposed?
- Are you running a fever?
- Are you experiencing any COVID-19 symptoms as currently identified by the CDC: <u>https://www.cdc.gov/</u> <u>coronavirus/2019-ncov/symptoms-testing/symptoms.html</u>
- Have you come in contact with anyone who has tested positive for COVID-19?
- You may want to request that employees provide advance notice of personal travel and you may even require self-quarantine if they are travelling to a potentially risky area.
- Ask employees to call in and report if they or anyone in their household tests positive for COVID-19 and establish a clear policy for you and your employees in this situation. Remember a person with the virus may not display symptoms.
- You may want to discourage employee carpooling or establish policy and best practices for those employees who must continue to carpool.
- You may want to discourage use of public transportation. If public transportation is necessary then require the employee to wear a mask and perhaps ask them to bring a change of clothes for when they get to work. Perhaps you can modify the employee's start and end time so they are able to avoid heavy travel periods.
- Determine when you will allow business travel by your employees. If and when you do allow travel to resume, establish standards for those employees who do travel.
- If implementing a daily checklist or questionnaire is not feasible, you should consider a self-declaration process where all employees are trained the requirements to declare COVID-19 symptoms or contact.

You may want to take temperature checks of employees reporting to work. Consider the following:

- Control access to the facility to ensure everyone passes through the check point before entering the facility
- If you have a large facility you may want to have multiple check points to keep the line moving
- Use no touch, thermal temperature sensing devices.
- Keep the readings private.
- Communicate with employees at what temperature you will send them home. This way they can be proactive and check at home first and know when not to come to the facility.
- Make sure whoever is using the thermometer(s) has proper PPE, understands how to use the thermometer and validates the thermometer has been calibrated.

On-site Testing

• When test kits become more readily available, you may choose to perform testing at your worksite. Check the CDC or local health authority website to determine if this is something you want to implement.

Containment

Should someone become ill while at work or should someone report that they have reported positive for COVID-19, you should take appropriate action to minimize exposure to other employees. Now is the time to refer to your contingency plan as outlined previously. Your contingency plan should identify a clear lead for managing these situations. Consider the following containment items:

- If an employee becomes ill or exhibits symptoms while at work, ask the employee to leave the worksite immediately.
- If a sick employee is unable to leave immediately, put them in a room that is isolated from other employees.
- When an employee falls ill at work or reports that they are experiencing symptoms or have tested positive for COVID-19, begin contact tracing. Remember an employee may contain the virus for several days before they exhibit symptoms, so track not only the current day but also going back at least 2 days previous. The contact tracing should include people as well as areas in the facility the employee contacted. You will also need this investigation to confirm whether or not this is an OSHA recordable illness.
- Move other employees, as necessary, so they are outside of the areas of the facility where the ill employee contacted. Be careful to take care of the potentially exposed employees while not disclosing the identity of the ill employee.
- Identify how you will clean and sanitize the exposed areas. Work with your outside or inside cleaning team throughout the process. If you used an isolation room, make sure you clean this area, as well.

Facility Access

As you re-open or increase production in your facility, you will find it necessary for more and more people to enter your facility. You should create policies and procedures for employees who have been working remotely, visitors, and contractors. Things to consider including in your policy are:

- Require these people to set appointments prior to entry.
- Share your new requirements for entry and work on site with these people ahead of time so they can be prepared. Make sure they are prepared with any PPE you now require. Also emphasize your requirements for maintaining distance and any access limitations they may face when they are on site.
- Require some type of health check prior to allowing them on site questionnaire similar to employee questionnaire and potentially a temperature check prior to entry.
- Check with any visitor who is not an employee to see if they have any new requirements or requests for when they are on site.



Decisions about Face Covering in Manufacturing

Some governing bodies are requiring face coverings and not providing clear definitions or specifications on what is considered a "face covering." Add to this the fact that manufacturers must put in place a respiratory protection program if they require fitted respiratory protection such as N95s or half face or full face respirators. <u>https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134</u>. So, what seems simple to do becomes a multi-layered set of decisions.

Before presenting information about the different types of face coverings, it is important to understand a bit about why face masks are so important during this COVID-19 crisis. A person with the virus carries around a viral load that varies throughout the different stages of the disease. This person can shed the virus, for instance when they cough or sneeze. Then if someone else is exposed to the virus that is shed, they can be exposed to a big amount or a smaller amount and this is called the viral dose or infectious dose. It is speculated that the larger the viral dose you take in, the worse the symptoms you experience. This supposition is based on studies done for influenza, SARS and MERS. (note: I am not a physician or epidemiologist, so I encourage you conduct your own investigation. Here is an informative webinar by a physician that was recorded not too long ago. https://beloithealthsystem.org/webinar)

Current understanding of COVID-19 transmission is that even if you are exposed, the more you can minimize the dose of the exposure, the better off you are. So, here are some of the face covering options to consider. Note: The term "face covering" is intentional in order to expand your knowledge beyond N95 respiratory devices.

As a manufacturer, if you are requiring some form of PPE, in this case a face covering, then you should make an informed decision about the best type for your facility. Unfortunately, beyond N95 masks or other fitted respiratory devices there has been little information available to help you make an informed decision. The good news is that Northeastern University recently published a study they conducted to determine the efficacy of different face coverings. This study, updated as recently as April 17, 2020, has not yet been published; however, the researchers have made it publicly available: https://www.northeastern.edu/envsensorslab/wp-content/uploads/2020/04/FernandezMueller_PreliminaryReportFacemaskTestingProtocol_2020-04-17.pdf. Read the study for yourself to understand their testing methods and determine your own confidence in the data. Here is a highlight of some of their findings:

- The material the mask is made from plays a significant role in the efficacy of the mask
- You can increase the tightness of the fit of the cloth masks by using a nylon stocking

The following table is based on Figure 5 of the report. The highlight of the findings are how closely a cloth mask can get to blocking particles when used along with a nylon band. Please note that these are approximate values based on interpretation of the Figure in the original document.

		Арргох.	Approx. Average particle removal: with invion layer (%)
		Average	
		particle	
Mask Type	Description		
3M 1826	3M 1826 surgical mask. 3-ply nonwoven material with nose wire and ear loops.	75%	90%
	Medical/Dental masks purchased from Staples Online. No product number		
	available. Specification sheet indicates 3-ply polypropylene. Includes a nose		
Staples	wire and ear loops.	58%	85%
	Charcoal filter mask with no brand/producer information available. 3-ply nonwoven material with		
Charcoal	1-ply charcoal/polymer nonwoven filter and nose wire and ear loops.	74%	85%
	2-ply cotton pocket with replaceable organic cotton batting filter. 21 cm ×10 cm rectangular		
Mask A	pocket without pleats and with elastic ear loops	35%	83%
	2-ply cotton with organic cotton batting with nose wire and elastic ear loops. Constructed from		
Mask B	approx. 21 cm × 13 cm rectangle (finished size) gathered to 9 cm on short edge.	37%	82%
	2-ply cotton with nose wire and elastic ear loops. Constructed from approx. 21 cm × 13 cm		
Mask C	rectangle (finished size) gathered to 9 cm on short edge.	36%	58%
	2-ply cotton with Pellon interfacing with elastic ear loops. Constructed from 25 cm × 20 cm		
	rectangular layers, pleated at the short edges to 8 cm, with 22 cm elastic ear loops sewn through		
Mask D	the pleated edge.	59%	78%
	2-ply cotton with elastic ear loops. Finished size 20 cm × 16 cm rectangle gathered to 10 cm on		
Mask E	short edge.	28%	72%
	2-layer cotton with vacuum cleaner bag section as filter insert with elastic ear loops. Made using		
	the Gather Here Fabric Face Mask pattern		
Mask F	{https://drive.google.com/file/d/1zpagdPA89kHFfV2YZzfejyDIN95mTvG8/view)	60%	78%
	2-layer cotton with Halyard H600 filter insert with elastic ear loops. Made using the Gather Here		
	Fabric Face Mask pattern		
Mask G	{https://drive.google.com/file/d/1zpagdPA89kHFfV2YZzfejyDIN95mTvG8/view}	32%	72%
	2-layer cotton pocket without insert with elastic ear loops. Made using the Gather Here Fabric		
Mask H	Face Mask pattern (https://drive.google.com/file/d/1zpagdPA89kHFfV2YZzfejyDIN95mTvG8/view)	45%	52%
	2-ply cotton pocket without filter and with elastic ear loops. Finished size 17 cm × 16 cm gathered		
Mask I	to 7 cm on short edge.	65%	69%
	Cotton and 2-ply cotton muslin pocket without filter and with elastic ear loops. Finished size 21		
Mask J	cm × 16 cm pleated to 7 cm along short edge.	71%	81%
Note: Masks A	- I were sewn fabric masks		

Actions for you to take as you consider face coverings for your employees:

- If you require N95 masks, be aware that they fall under the OSHA requirements for a respiratory protection
 program. As for now, the fit testing requirement has been relaxed in all industries: https://www.osha.gov/
 memos/2020-04-08/expanded-temporary-enforcement-guidance-respiratory-protection-fit-testing-n95. You
 should still make your best effort to help employees maintain a good fit if you require these respiratory devices.
- If you require a surgical mask or cloth face covering, select a mask with a tightly woven fabric, consider whether to use one with some sort of liner or filter between layers, and determine whether you want to encourage the nylon stocking band to increase effectiveness.
- Make sure employees cover both their mouth and their nose with the face covering. This can lead to glasses and safety glasses fogging, so make sure you have anti fog wipes available or help employees adjust the masks to avoid their glasses fogging. They must be able to see in order to work safely. Washing your glasses with soap and water ahead of time may help prevent fogging by creating a lower surface energy on the lens (think auto polish beading the water in the rain).
- Provide training on how to handle the masks when removing them. It is generally better to remove them by the straps so that a person doesn't touch the front of the mask that may have been exposed to the virus.
- Determine how you will handle used masks Will you throw them all away? Will you collect them to get them laundered? When should they be placed in trash or laundry – at end of day, each time you remove them? Make sure employees don't leave them lying around where they could contaminate other surfaces. You might consider color coding to indicate a before lunch mask or after lunch mask; or alter colors by day of the week to make sure they are being laundered on a daily basis.

You should treat even a face covering as you would any other PPE that you require your employees to use. Make sure it is the correct design, train employees how to use it, and inform them how to clean or dispose of it properly.