

# DAIRY FOOD SAFETY ALLIANCE



Revised Version 04-14-2020

## SOP Template Addressing COVID-19 Positive Worker (Revised 04-14-2020)

### 1.0 Scope

- 1.1 This procedure details the steps that should be taken by the processor should an employee test positive for the organism that causes COVID-19.
- 1.2 This procedure is applicable for both symptomatic and asymptomatic employees.
- 1.3 This procedure can be modified to meet the needs of an individual processing facility in order to better align with corporate policies.
- 1.4 This procedure can be used as part of your COVID-19 risk mitigation strategy to protect your business, your employees and the entire food supply-chain.

### 2.0 Responsible Parties

- 2.1 Responsibility for the implementation, execution and success of this program is cross functional:

#### Internal Partners

- Human Resources
- Production / Manufacturing
- Food Safety/ Quality Assurance
- Crisis Response Team

#### External Partners

- Local (County) Health Department
- State Department of Agriculture
- Centers for Disease Control and Prevention

Center for Dairy Research Contact: Marianne Smukowski, [msmuk@cdr.wisc.edu](mailto:msmuk@cdr.wisc.edu)

Dairy Farmers of Wisconsin Contact: Adam Brock, [abrock@wisconsinmilk.org](mailto:abrock@wisconsinmilk.org)

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## 3.0 Equipment/Supplies/Materials

- 3.1 Equipment, supplies and materials needed to ensure the safety of personnel in the plant. This list will vary from plant to plant depending on plant specific policies and local health department ordinances.

## 4.0 Safety

- 4.1 Follow current plant safety policy and good manufacturing practices in accordance with federal, state and corporate policies as outlined in **Good Manufacturing Practices – SOP XXXX**
- 4.2 Ensure appropriate person protective equipment (PPE) is included in this section as well **Personal Protective Equipment – SOP XXXX**
- 4.3 Review appropriate handwashing procedures **Handwashing Policy & Procedure – SOP XXXX** and proper use and disposal of gloves, hair nets and beard nets **Glove Procedure – SOP XXXX, Hair Net & Beard Net SOP XXXX**
  - 4.3.1 Ensure that handwashing procedure signage is included near all handwashing station, bathrooms and kitchen areas within the facility.
- 4.4 Ensure that all visitors, contract workers, temporary workers, and routine delivery personnel adhere to corporate plant visitation policies **Visitor Policy – SOP XXXX, Contract Worker Policy & Procedures – SOP XXXX, Contract Worker Policy & Procedures – SOP XXXX, Plant Delivery Policy & Procedures – SOP XXXX**
- 4.5 Ensure that all soap dispensers and hand sanitizer dispensers and full, clean, and in proper working order in accordance with corporate policies. Provide refresher training in this area as needed **Handwashing Policy & Procedures – SOP XXXX, Handwashing Training Form, Soap and Sanitizer Procedures – SOPs XXXX**
- 4.6 Temperature monitoring of employees should take place prior to entering the facility. Any employee with a temperature (>100.4 °F) should not be allowed to enter the processing facility.
- 4.7 Usage of face masks in either the office or processing environment should align with Centers for Disease Control and Prevention recommendations. Corporate policies must

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address proper fit, sanitation practices for face masks, and disposal of face masks. Policies must not conflict with general food safety practices or good manufacturing practices.

- 4.8 Ensure procedures are in place to practice social distancing (at least 6 feet away from the next closest individual) in accordance with CDC and Wisconsin Department of Health Services guidance documents.

## 5.0 **Procedure**

- 5.1 Symptomatic or asymptomatic employees outside of the facility, but have worked within the facility and/or within the food processing area within the past 7 days – positive COVID-19 test
  - 5.1.1 The employee should not return to the facility until they are approved to return by the local health department.
  - 5.1.2 Document all the employees that have been in close contact with the afflicted employee within the past 7 days.
    - 5.1.2.1 Close contact is defined by the Centers for Disease Control and Prevention as: (1) an employee who has been within 6 feet of a confirmed or suspected COVID-19 positive individual for a prolonged period of time (including up to 48 hours prior to symptom onset) OR having direct contact with infectious secretions of a COVID-19 positive individual.
    - 5.1.2.2 Walking past an employee or walking through a processing line is NOT considered close contact.
  - 5.1.3 Employees that are deemed to have had low risk exposure to an individual with a positive COVID-19 test should continue to work, but must self-monitor for fever ( $>100.4$  °F) and/or respiratory symptoms such as cough and shortness of breath.
  - 5.1.4 Employees that are deemed to have had a medium or high-risk exposure to an individual with a positive COVID-19 test should continue to work, but must self-monitor for fever ( $>100.4$  °F) and/or respiratory symptoms such as cough and

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shortness of breath. Employers may require that the employee be off work for a period of time per their company policy.

- 5.1.5 Thoroughly clean and sanitize areas that the employee came in contact with during their time in the facility.
- 5.1.6 Continue to maintain contact with the afflicted employee to ensure their health and well-being while away from the facility.
- 5.2 Symptomatic or asymptomatic employees in the facility, but outside of food processing areas in the plant – positive COVID-19 test
  - 5.2.1 Any symptomatic employee, meaning an employee that is coughing, sneezing has trouble breathing, should not be allowed into food production areas.
  - 5.2.2 The employee should be placed into quarantine; ideally in a low traffic location within the facility.
  - 5.2.3 The local health department must be notified about the incident. Additional direction will be given by an employee of the local health department.
  - 5.2.4 Document all the employees within a 6 foot radius of the afflicted employee.
  - 5.2.5 Employees that are deemed to have had low risk exposure to an individual with a positive COVID-19 test should continue to work, but must self-monitor for fever (>100.4 °F) and/or respiratory symptoms such as cough and shortness of breath.
  - 5.2.6 Employees that are deemed to have had a medium or high-risk exposure to an individual with a positive COVID-19 test should continue to work, but must self-monitor for fever (>100.4 °F) and/or respiratory symptoms such as cough and shortness of breath. Employers may require that the employee be off work for a period of time per their company policy.
  - 5.2.7 Upon approval from the local health department, escort the employee outside of the facility.
  - 5.2.8 Thoroughly clean and sanitize areas that the employee came in contact with during their time in the facility.

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- 5.2.9 Continue to maintain contact with the afflicted employee to ensure their health and well-being while away from the facility.
- 5.3 Symptomatic or asymptomatic employees in the facility and in food processing areas of the plant – positive COVID-19 test
  - 5.3.1 Any symptomatic employee, meaning an employee that is coughing, sneezing has trouble breathing, should not be allowed into food production areas.
  - 5.3.2 Any asymptomatic employee, meaning an employee not showing typical symptoms associated with COVID-19 but afflicted with illness based upon test results, should be immediately removed from the processing area.
  - 5.3.3 The employee should be placed into quarantine; ideally in a low traffic location within the facility and outside of the food processing area of the facility.
  - 5.3.4 The local health department must be notified about the incident. Additional direction will be given by an employee of the local health department.
  - 5.3.5 Immediately shut down the production line.
  - 5.3.6 Communicate to employees on the line the they have been in contact with an employee that has been confirmed positive for the organism that causes COVID-19.
  - 5.3.7 Document all the employees within a 6 foot radius of the afflicted employee.
  - 5.3.8 Employees that are deemed to have had low risk exposure to an individual with a positive COVID-19 test should continue to work, but must self-monitor for fever (>100.4 °F) and/or respiratory symptoms such as cough and shortness of breath.
  - 5.3.9 Employees that are deemed to have had a medium or high-risk exposure to an individual with a positive COVID-19 test should continue to work, but must self-monitor for fever (>100.4 °F) and/or respiratory symptoms such as cough and shortness of breath. Employers may require that the employee be off work for a period of time per their company policy.

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- 5.3.10 Upon approval from the local health department, escort the symptomatic employee outside of the facility.
- 5.3.11 Begin a deep clean and sanitation of the processing area in accordance with CDC, local health department and corporate policies. Data indicates that SARS-CoV-2 can survive on aerosols for up to 3 hours, copper up to 4 hours, cardboard up to 24 hours, and stainless steel up to 3 days.
  - 5.3.11.1 Close-off areas that were used by the afflicted employee and wait at least 3 hours, if possible, up to 24 hours before beginning, cleaning and disinfection.
  - 5.3.11.2 Ensure all employees wash their hands **Handwashing Procedure – SOP XXXX** and have proper personal protective equipment **Personal Protective Equipment Policy & Procedures – SOPs XXXX**
  - 5.3.11.3 Use cleaning and sanitation chemicals that are [EPA-registered](#) “disinfectant” products for COVID-19. Work with your chemical supplier to ensure that your cleaning and sanitation chemicals are approved for use through the [EPA emerging viral pathogen](#) program for use against SARS-CoV-2, the coronavirus that causes COVID-19.
  - 5.3.11.4 Always check the product label guidelines to ensure that the disinfectant products are safe and recommended for use in food manufacturing facilities.
  - 5.3.11.5 Initiate processing area cleaning and sanitation procedures in accordance with plant and corporate policies **Sanitation Policies & Procedures: Processing – SOPs XXXX**
    - 5.3.11.5.1 Clean associated processing areas including door knobs, light switches, panel operator buttons, utensils, hoses, weight scales, indirect and direct product contact surfaces, writing utensils, etc.

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- 5.3.11.6 Non-processing areas utilized by the afflicted employee should also be cleaned and sanitized. Initiate non-processing area cleaning and sanitation procedures in accordance with plant and corporate policies **Sanitation Policies & Procedures: Processing – SOPs XXXX**
  - 5.3.11.6.1 Clean associated non-processing areas including key code panels, break rooms, locker rooms, bathrooms, doorknobs, light switches, desks, chairs, kitchens, writing utensils, etc.
- 5.3.12 Be sure to verify the effectiveness of your sanitation practices and be sure to document all results in accordance with company policies.
- 5.3.13 Continue to maintain contact with the afflicted employee to ensure their health and well-being while away from the facility.
- 5.4 Employees who **have not** had a confirmed positive COVID-19 test, but are showing symptoms including fever ( $>100.4$  °F) and/or respiratory symptoms such as cough and shortness of breath should be not be allowed in the facility.
  - 5.4.1 The employee should stay home, for a minimum of 72 hours, until they are fever free ( $<100.4$  °F using an oral thermometer) without the aid of fever-reducing medication, not exhibiting respiratory ailments such as coughing or shortness of breath AND at least 7 days have passed since symptoms first appeared.
  - 5.4.2 Continue to maintain contact with the afflicted employee to ensure their health and well-being while away from the facility.
- 5.5 All employees, including those that have had a confirmed positive COVID-19 test and those that have been in close contact with the afflicted employee, must meet the following requirements prior to returning to the processing AND while working in the facility:
  - 5.5.1 The employee must be fever free ( $<100.4$  °F using an oral thermometer) without the aid of fever-reducing medication for at least 72 hours.

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- 5.5.2 There must be a marked improvement in cough or shortness of breath.
- 5.5.3 If an employee plans to get tested prior to returning to work, a minimum of 2 negative test results (24 hours apart) must be provided by a medical professional.
- 5.5.4 Employees must adhere to all social distancing guidelines (greater than 6 feet between employees).
- 5.5.5. Employees should wear a face mask/covering at all times while in the workplace for 14 days since the time they might have been exposed or come in close contact with an infected individual.
- 5.6 Both the United States Department of Agriculture and the Food and Drug Administration have confirmed that there is no need to hold, withdraw or recall food that has been processed in a facility with a COVID-19 employee.
  - 5.6.1 Leading regulatory bodies, including the United States Department of Agriculture, Food and Drug Administration, and European Food Safety Authority have stated that there is no evidence to support that the organism that causes COVID-19 can be transmitted to humans through food or food packaging material.
  - 5.6.2 Packaging that has come into contact with either a symptomatic or confirmed positive individual should be wiped down with sanitizer or disposed of per corporate policy.
  - 5.6.3 Following proper handwashing procedures, good manufacturing practices, sanitation procedures, and employee wellness practices ensures the integrity of both raw materials and finished products.

## 6.0 **Forms**

- 6.1 **Name of Form SOP – XXXX**

## 7.0 **Definitions**

- 7.1 Include appropriate definitions included as a part of this specification

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7.2 N/A

## 8.0 References

8.1 Regulatory guidance and regulations:

8.1.1 FDA Resources

8.1.2 CDC Resources

8.1.3 USDA Resources

8.1.4 ETC

8.2 Technical articles:

8.2.1 *Cleaning and Other Control and Validation Strategies to Prevent Allergen Cross-Contact in Food-Processing Operations*, Journal of Food Protection, Vol 71, No.2, 2008, Pages 445-458.

8.2.2 ETC

## 9.0 Related Documents

9.1 **Program or Document Name SOP – XXXX**

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