

S-1127

May 2020

COVID-19
prevention safety plan

**SAMPLE**

Resources and information for developing

safety programs for agricultural businesses

### Introduction

This sample COVID-19 safety response plan contains the basic framework for an effective implementation of safety practices and procedures outlined in Oregon OSHA’s temporary rule, OAR 437-001-0749. This temporary rule addresses COVID-19 prevention in employer-provided housing, labor-intensive agricultural operations, and agricultural transportation. The rules established under OAR 437-001-0749 are effective from May 11, 2020 to October 25, 2020.

In [Insert company name]’s COVID-19 safety response plan we have assessed and developed procedures to reduce and prevent the spread of COVID-19. The items listed in this plan are additional precautions to our typical safety practices and procedures relating to field sanitation, ground transportation, and ag labor housing [delete if n/a].

These temporary rule changes apply to us because we fall under at least one of the three categories: [can delete, this is a reference]

1. Section 1 of this rule applies to all labor-intensive agricultural operations (activities that normally fall under OAR 437, Division 4) when employees would otherwise perform their duties or routinely congregate within 6 feet of one another. Agricultural employers whose normal activities do not involve such close contact have no additional requirements under Section 1. While this rule remains in effect, its requirements supersede those found in OAR 437-004-1110 “Field Sanitation for Hand Labor Work” for all activities otherwise subject to that rule.
2. Except as otherwise noted, Section 2 of this rule applies to all temporary worker housing or other employer-provided housing, whether such housing is otherwise currently covered by OAR 437-004-1120 “Agricultural Labor Housing and Related Facilities” or by CFR 1910.142 and OAR 437-002-0142 “Labor Camps.”
3. Section 3 of this rule applies to all employer-provided transportation within labor-intensive agricultural operations. It does not apply to employer-provided transportation when such transportation supports activities that fall outside the scope of Section 1 of this rule.

This program template serves as a guide. However, it will not be effective unless it includes specific information and policies from your workplace. Delete sections of the plan that do not relate to your operation. As it is a written plan, you will need to implement and periodically update this program for it to be effective at protecting employees. Review and learn the full rule before creating this plan: <https://osha.oregon.gov/OSHARules/adopted/2020/ao2-2020-text-emergency-rules-ag-covid.pdf>. The specific information that you will need to add to this sample plan to make it complete include, but are not limited to, the following:

**Field sanitation**

* Name of the person or title designated as the social distancing officer
* The steps you have taken to increase access to toilets and handwashing stations
* The steps you have taken to increase sanitation efforts
* How you will train employees on the prevention of COVID-19

**Transportation**

* How you will manage social distancing guidelines in vehicles
* How you will manage the use of facial coverings in vehicles
* How you will increase sanitation in vehicles
* How you will encourage social distancing in employer-owned and personal vehicles

**Ag labor housing [if this does not apply to your operation, delete]**

* Name of the person or title designated as the social distancing officer
* How you will increase access to toilets for ag labor housing
* How you will manage social distancing in ag labor housing
* How you will increase sanitation in ag labor housing
* How you will handle and report a confirmed COVID-19 case to the appropriate officials

**COVID-19 prevention safety plan**

(Enter your Company Name here)

#### Purpose

This COVID-19 prevention safety plan is designed to protect employees from the exposure or spread of COVID-19 in the workplace. [add company name here] strives to maintain a safe and healthy workplace and follows the field sanitation, vehicle transport, and ag labor housing [delete if does not apply] requirements already set out by Oregon OSHA under OAR 437-004-1110 “Field Sanitation for Hand Labor Work” and OAR 437-004-1120 “Agricultural Labor Housing and Related Facilities” or by CFR 1910.142 and OAR 437-002-0142 “Labor Camps.” [delete if does not apply]. This plan specifically addresses the additional precautions and steps required by agriculture operations under Oregon OSHA’s temporary rules set forth under OAR 437-001-0749. These temporary rules and this plan are in effect from May 11, 2020 to October 25, 2020.

**Field sanitation**

**Social distancing**

We will ensure proper social distancing for our farm labor employees by

* Identifying a social distancing officer
* Identifying tasks or jobs that pose challenges for social distancing and identify control measures
* Training employees and supervisors on expectations of social distancing and ensure those expectations are being met

The social distancing officer(s) at [insert company name] are [insert specific names or titles/roles of people established as your officer]. They have been trained on our COVID-19 prevention safety plan and trained on COVID-19 prevention concepts. The social distancing officer will be responsible for identifying appropriate social distancing and sanitation measures and ensuring that such measures are implemented and followed.

The social distancing measures that we have taken include the implementation of work activities that separate employees by a minimum of six feet from one another as they perform their duties, during breaks, or during meal periods. Table 1 lists tasks/situations that we have specifically changed due to COVID-19 social distancing guidelines and the new control measures and safety practices. Tasks not included have been deemed already tasks that involve social distancing.

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| **Table 1****Social distancing modified tasks**[list tasks that have been modified due to COVID-19] |
| **Task/Situation** | **New control measures/practices** |
| Field crews hand hoeing fields side-by-side | Require all employees to maintain six feet of distance at all times and to space out, one person per row. |
| Weighing harvested produce | Signs and tape will be posted indicating where workers should stand to maintain six feet distance while in line. Additional weight and product checkers will be added to reduce lines. **(Note: This template is meant to serve as a guide.)** |

Some tasks and situations have been identified on our farm operation that make social distancing, specifically contact within six feet, impossible. To mitigate these situations, we have identified those specific tasks and established additional control measures to ensure the safety of all; see Table 2. When face coverings are required, we, as the employer, will provide the necessary PPE.

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| **Table 2****Tasks that require less than six feet distance between employees**[list here those tasks and what protective measures have been taken] |
| **Task/Situation** | **New control measures/practices** |
| Training new employeeshow to operate equipment or tools | When not feasible to train these employees using posters, videos, or communicating six feet apart, the trainer and new employee will conduct the training in open air with the use of face coverings. Sanitation materials will be used on items shared between trainer and new employee. |
| Planting equipment that requires workers to be within six feet due to the design | Employees working on these planting machines will be required to wear face masks that are provided by us, the employer. |

**Potable water**

We will ensure all employees have immediate access to safe potable water. We will provide potable water in a way that meets social distancing guidelines and eliminates the sharing of drinking cups. [add any additional specifics]

**Toilet and handwashing facilities**

Our typical toilet and handwashing safety and sanitation efforts will continue, in addition to new COVID-19 safety efforts. Effective June 1, 2020, we will increase our toilet and handwashing facility at worksites from one per 20 employees to one per 10 employees. [In the event you were unable to acquire additional toilet and handwashing stations, document your attempts and continue attempting until the ratio has been satisfied.]

We will ensure that toilet and handwashing facilities are located adjacent to each other at the entrance or exit to the field or in a completely harvested area, whichever is closer. In any case, such facilities will be no more than a five-minute or a one-quarter-mile (1,320 feet) unobstructed walk from each hand-laborer’s place of work in the field. Where, due to terrain, it is not feasible to locate facilities as stated above, the facilities will be at the point of closest vehicular access.

Toilet and handwashing facilities will be maintained in a clean and sanitary condition. Toilets and handwashing stations will be sanitized at least three times daily to mitigate the spread of COVID-19. [insert title or person’s name] will be responsible for ensuring these additional sanitation efforts.

We will post a notice describing effective field sanitation measures as well as the requirements of the temporary OAR 437-001-0749 rule in a place accessible to workers. We will post in additional languages as made available by Oregon OSHA and if needed by workers.

**Communication**

Every employee will receive information about these new COVID-19 prevention rules. Employees will also be trained on the location of the sanitation facilities and water, and that they have access and are encouraged to use them when necessary. Employees will also be trained on the following concepts:

* Using the water and facilities provided for drinking, handwashing, and elimination
* Drinking water frequently, especially on hot days
* Urinating as frequently as necessary
* Washing hands both before and after using the toilet
* Washing hands whenever high-contact surfaces have been or will be touched
* Washing hands frequently and after covering a cough or sneeze
* Washing hands before eating and smoking

**COVID-19 suspected or confirmed cases**

If an employee is suspected of COVID-19 or is tested positive for COVID-19, the following actions will be taken to ensure their health and safety as well as that of their co-workers: [insert how you plan to handle these situations]

**Employee transportation**

**Social distancing**

When transportation is provided to and from the workplace or used to move individuals between workplaces by [insert company name], the following disease-prevention measures will be implemented:

* The vehicle operator and any passengers will be separated by at least three feet during the operation of the vehicle.
* The vehicle operator and all passengers must wear cloth facial coverings that cover the nose and mouth. [Insert company name] will provide these face coverings.

**Sanitation**

All high-contact surfaces such as door handles, seatbelt buckles, arm rests, steering wheels, etc., will be sanitized before each trip or at least twice daily when in continuous use. [insert additional information as to who is responsible for this additional sanitizing, where/how they can access cleaning materials, etc.]

We will educate all workers commuting to and from work (during personal time) with other workers about the risks presented by close contact, and encourage them to employ practices similar to those enforced during work hours.

**Ag labor housing [Delete if does not apply]**

The steps and items identified in this COVID-19 prevention safety plan are in addition to the steps and policies already established under OAR 437-004-1120 ‘Agricultural Labor Housing.’ This plan only includes additional steps we have taken due to COVID-19.

**Social distancing**

We will ensure proper social distancing for our employees living in our ag housing units by

* Identifying a social distancing officer
* Identifying tasks or situations that pose challenges for social distancing and identifying control measures
* Training employees and supervisors on expectations of social distancing and ensuring those expectations are being met

The ag labor housing social distancing officer(s) at [insert company name] are [insert specific names or titles/roles of people established as your officer]. They have been trained on our COVID-19 prevention safety plan and trained on COVID-19 prevention concepts. The social distancing officer will be responsible for identifying appropriate social distancing and sanitation measures and ensuring that such measures are implemented.

The social distancing measures that we have taken include the improvements to our ag labor housing floor plans to ensure workers will not need to be within six feet of each other. According to OAR 437-001-0749, the following requirements will be met: [taken directly from the temporary rule]

* Each sleeping room without double bunk beds will have at least 50 square feet of floor space per employee. Where there are double bunk beds for related individuals, there will be 40 square feet per occupant. We do not use triple bunks, and do not allow the use of double bunk beds by unrelated individuals.

Beds will be arranged so that at least one of the following is true:

* Beds and cots are spaced at least six (6) feet apart between frames in all directions and arranged so that occupants sleep head to toe; **OR**
* Beds and cots are separated by a bed length, floor-to-near-ceiling, temporary, nonpermeable barrier (for example, plexiglass, heavy plastic, lightweight wood sheeting) placed perpendicular to wall such that a 28-inch minimum aisle remains available to the occupant of each bed; **OR**
* An operator may implement other effective engineering and/or administrative controls to modify this requirement with prior approval by Oregon OSHA.

[Insert any housing unit specific information that helps to further outline your plan to increase social distancing in your housing units such information might include who/when face coverings will be required.]

**Toilet, shower, and handwashing facilities**

We will provide one shower head for every 10 occupants. We will provide one handwashing sink or basin for every six occupants. [If the living unit does not have hand washing facilities, state where common use facilities are- must be close to the toilet or the sleeping places]. Effective June 1, 2020, we will provide one toilet facility for each 10 occupants. [In the event you were unable to acquire additional toilet and handwashing stations, document your attempts and continue attempting until the ratio has been satisfied.]

**Cleaning and sanitation**

All housing units will be provided with cleaning materials at no cost to employees. Prior to occupancy all housing units will be thoroughly cleaned and sanitized. To mitigate the spread of COVID-19, additional cleaning and sanitation efforts will be enforced in our ag labor housing units. Once occupancy begins, all high-touch and contact surfaces—including but not limited to door handles, shower and sink knobs, paper towel dispensers, toilets, tables, chairs—will be cleaned two times a day. Employees will be assigned this work activity [Cannot be treated as a volunteer task]. Portable and chemical toilets will be cleaned and sanitized at least three times a day.

**COVID-19 suspected or confirmed case**

If an employee is suspected of COVID-19 or is tested positive for COVID-19, the following actions will be taken: [For this section it is important to create your farm-specific plan of action. The guidelines set forth by Oregon OSHA have been directly copied below; review them and create a specific plan of action including where and how you will isolate suspected or confirmed cases, etc.]

(hh) Implement policies and procedures to identify and isolate sick occupants.

(A) Suspect COVID-19 cases must be isolated with sleeping, eating, and bathroom accommodations that are separate from others. Sick people should be isolated from others, have adequate hygiene facilities, and be taken care of by only one person in the household. If such isolation is not possible, follow guidance provided by the Oregon Health Authority or the local public health authority to make appropriate arrangements.

(B) Confirmed COVID-19 cases must be isolated and only housed with other confirmed cases and must have separate bathroom, cooking and eating facilities from people who have not been diagnosed with COVID-19. Sick people should be isolated from others, have adequate hygiene facilities, and be taken care of by only one person in the household. If such isolation is not possible, follow guidance provided by the Oregon Health Authority or the local public health authority to make appropriate arrangements.

(C) The operator must ensure that food and water is provided and monitor the safety of occupants in isolation at the operator’s facility or ensure that these services are provided if isolated at another facility.

(ii) Access to ORS and OAR. Those wishing access to any of the Oregon Revised Statutes (ORS) or Oregon Administrative Rules (OAR) referenced here, may contact the Oregon OSHA Resource Center in Salem or the nearest Oregon OSHA Field Office.

(jj) Closure and alternative housing.

(A) The operator of agricultural labor housing must provide replacement lodging without charge to the occupants if a government agency with the authority to enforce building, health or safety standards declares the housing or facilities to be uninhabitable and orders them vacated.

(B) The operator must provide replacement lodging for 7 consecutive days from the time the housing was closed or until the closing agency allows the original housing to reopen, whichever is shorter.

(C) Replacement lodging must meet or exceed the health and safety standards of Oregon OSHA. Oregon OSHA must approve the location of the replacement housing before employees are sent to it.

(D) Operators must arrange for replacement lodging not later than the end of the day the original housing closes or another date designated by the closing agency.

(E) Post the address of the replacement housing:

(i) Not later than the end of the day the original housing closes.

(ii) In a place convenient to affected workers.

(iii) In all languages spoken by the occupants.

(F) The posting in (e) above must state that the replacement housing is free to occupants of the closed housing.

(G) The operator must give Oregon OSHA a list of names of the occupants and the location of the replacement housing, for each.

(H) When the cause of the closure is beyond the control of the agricultural labor housing operator, sections (a), (b), (c), (d), (e) and (g) above do not apply. To determine whether the cause of closure was beyond the control of the operator, Oregon OSHA will consider these circumstances, including but not limited to:

(i) Whether the cause of the closure is a natural disaster;

(ii) Whether the circumstances leading to the closure were known or should have been known to the operator;

(iii) Whether operator diligence could have avoided the circumstances leading to the closure.

(I) Agricultural labor housing occupants entitled to temporary replacement housing under this rule must accept or reject that housing when the original housing closes. These rules do not obligate operators to reimburse displaced occupants for housing they obtain without the operator’s knowledge or consent. The operator is responsible for replacement lodging only for as many people as occupied the original closed housing. When an occupant rejects the replacement housing, the operator has no obligation to reimburse that occupant for other replacement housing.

**Training**

We understand that this plan is only successful if all employees, supervisors, and leaders are involved in these efforts. We will establish open communication with our employees to ensure they are educated about this plan; how COVID-19 is spread; what steps they can take to reduce the spread; and what our farm is doing to ensure their health and safety. [Insert any specific information related to how you will train employees such as when, by who, what specific information will be shared, etc.]

Below are examples of free posters and training materials you may consider using:

**Field sanitation poster**

English ―
Print on blue paper: <https://osha.oregon.gov/OSHAPubs/1890C19-2.pdf>

Spanish ―
Print on blue paper:<https://osha.oregon.gov/OSHAPubs/1890sC19-2.pdf>

**COVID-19 prevention videos**

English ― <https://www.youtube.com/watch?v=vcoYOdshpzM&list=PLvrp9iOILTQaJa78zFQ0QgvShQ2HEwHxP>

Spanish ― <https://www.youtube.com/playlist?list=PLvrp9iOILTQZdKZTcAaYdyu4wKmhGCJNc>