



Memorandum

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From: John Gibbins, CDC National Institute for Occupational Safety and Health
Kendra Broadwater, CDC National Institute for Occupational Safety and Health
Julie Sinclair, CDC, Team Leader

To: Farah Ahmed, Kansas Department of Health and Environment

Copy: Dennis Boyles, National Beef Plant Manager, Seward County
Kris Ragan, National Beef Plant Manager, Ford County
Martin Rosas, President, UFCW Local 2
Angela Sowers, Administrator, Ford County Health Department
R.C. Trotter, Health Officer, Ford County Health Department
Martha Brown, Director, Seward County Health Department
Lee Norman, Kansas Secretary of Health
Mike Beam, Kansas Secretary of Agriculture

Subject: Strategies to reduce COVID-19 transmission at the National Beef meat processing facilities in Ford and Seward Counties, Kansas

Background

On April 20, 2020, CDC received a request for technical assistance from the Kansas Department of Health and Environment (KDHE) in developing strategies to help prevent SARS-CoV-2 infections in workers at multiple Kansas meat processing facilities. We are copying the appropriate county and state health officials and company representatives on memos for each of the five facilities we visited (three company memos covering five plants). We are also including 'best practices in implementation' seen in facilities of all three companies (National Beef, Cargill, and Tyson) with their permission. In our opinion, highlighting these 'best practices in implementation' will improve mitigation strategies and further educate the decision makers within these meat processing facilities.

On April 23, a CDC team held a teleconference with National Beef corporate staff to learn about steps that their company were taking to protect employees from SARS-CoV-2 in their processing facilities. We visited the National Beef plants in Ford County on April 24, 2020, and Seward County on April 27, 2020. We observed the fabrication process and toured the harvesting work area, both of which were operating at lower capacity due to reduced worker numbers. Worker numbers were reduced due to SARS-Cov-2 positive workers in isolation (approximately 200 per day at Seward County site and 190 at Ford County site), and workers in quarantine as a result of close contact with a positive case or self-quarantine for personal reasons (approximately 200 per day at Seward County site and 400 at Ford County site). Overall increased absenteeism (not included in the previous categories) contributed to the reduced workforce (approximately 150 per day at Seward County site and 250 at Ford County site). The harvesting area is where animals are stunned, eviscerated, and processed into beef halves. The fabrication department processes

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the beef carcasses into various beef products/cuts that are boxed for shipment. During standard operations, the plant operated two processing shifts and a third sanitation shift. This third sanitation shift cleans the entire plant with a focus on processing equipment. All employees performing sanitation are from a third-party contractor. Contract employees work on the sanitation shift to clean the plant overnight.

We met with staff from the Ford and Seward County Health Departments to learn about their efforts in contact tracing and testing symptomatic Ford and Seward County residents for SARS-CoV-2 infection. We also met with the United Food and Commercial Workers (UFCW) Local 2 President on April 29, to gain his perspective on plant operations and the mitigation steps the meat processing plant management and union had taken to limit SARS-CoV-2 transmission in the facility.

This memo is not intended to document every observation and intervention that occurred at each plant. It is a summary of the plant's implementation of the CDC/OSHA guidance found at <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html>. We observed that companies had implemented many recommended changes by the time of our site visit. We discussed our preliminary recommendations for each facility during closing meetings while onsite to facilitate their timely implementation. This memo summarizes and highlights areas where we observed best practices for implementation of the CDC/OSHA guidance across companies and areas that could be modified to more closely match existing guidance to better protect worker safety and health. Additionally, our recommended controls are intended to supplement those required and recommended by the KDHE and county health officers per the KDHE [modified quarantine](#) of close contacts who work in critical infrastructure.

Observations and discussion

Both sites have instituted body temperature monitoring upon entrance to the plant. Both sites use a thermal imaging system for body temperature measurement. Temperature screening was monitored by in house security staff. If an employee appeared to have a fever, they were evaluated by the occupational health clinic staff.

Both sites had instituted a face covering requirement for all employees and visitors in accordance with CDC recommendations for critical infrastructure employees and the public. Every person arriving onsite was required to wear a face covering and employees were provided with a surgical-style mask every day. During our walkthroughs we observed almost everyone wearing a face covering, but many people throughout the Ford County site did not have their noses covered. Some employees had elected to wear a face shield instead of a face covering. Some employees at the Seward county plant wore a face shield in the place of safety glasses for some positions. Both sites had staggered both breaktimes and shifts to reduce the number of people in common areas during breaks and between shifts. To do this, both facilities modified production practices to send fewer people to break at once (specifically slowing chain speed to extend break times).

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The Ford County plant had limited signage regarding COVID-19 precautions and notices. Letters and text-heavy notices were posted in bulletin boards. A few signs about social distancing messages and instructions to stay home when sick were posted near break areas in English and Spanish. We saw limited information about symptoms and prevention, and visual cues to remind employees of social distancing at the Ford County plant. In the Seward county plant, some COVID-19 signage was posted in the break areas. Other educational materials were limited in common areas and at locker room entrances, at both plants. At the Seward County plant, they had posted pictures of overnight cleaning and other controls in the lunch area to show employees the steps being taken to disinfect workspaces and common spaces. These steps included area fogging, locker room disinfection, and other controls.

At both facilities, physical barriers had been installed on tables in lunch areas. Management set up additional break/lunch areas outdoors. We did not observe handwashing stations or temporary restrooms near these overflow break/lunch areas. We talked with both sites about the need for additional break areas and toilets as more employees return to work, in addition to potential modification of production practices to reduce the number of employees at break at once.

At both plants, barriers were installed between line workers in places where they could not maintain 6 feet between employees. At the Seward County plant, the barriers were installed in such a way that they could be slid parallel to the line to adjust to the employees' work and prevent arms and elbows from hitting the partition. For some areas on the harvest lines at both plants, it may be difficult to install barriers or maintain spacing due to work processes. Hand sanitizer dispensers were located throughout the plants, notably at the entrances to the plant and at entrances to lunchrooms as part of the plant food safety program. At the Seward county site, staff were positioned at entrances to apply hand sanitizer to employees. Both sites had limited sanitizers within the break area. The locker rooms had hands-free pedal-operated handwashing stations.

Additional staff have been assigned to clean and sanitize commonly touched surfaces more frequently, such as handrails, doors and door handles, and lunch tables at both sites. Time clocks in the plant were touch-free for plant workers.

At both locations, supervisors were expected to provide on-the-job training and communicate with their workers. Neither site had conducted COVID-19-specific in-person trainings. The Seward county plant had connected with the local popular radio Spanish-language station to provide messages to the local community and they had communicated through a private Facebook group that had several hundred employees. These tools were used to establish open communication with staff to encourage behavior at and outside of work that prevents infection.

Conclusions

Management at both sites had implemented controls at the plants to help prevent and mitigate the spread of SARS-CoV-2 between workers. Recommendations are provided below to assist management, the union, and workers with efforts to limit virus transmission in the plant.

Site Recommendations

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The following recommendations were provided to augment existing controls to help prevent the spread of SARS-CoV-2 between workers. We understand that with ongoing community transmission, COVID-19 cases will continue to be identified. However, the existing and recommended controls with ongoing education will be useful in reducing transmission in the workplace.

These recommendations are intended specifically for the National Beef plants. A qualified workplace coordinator should be identified who will be responsible for assessment and control planning for these and any other interventions to be rolled out in the workforce. Continued partnering with labor representatives on consistent messaging concerning COVID-19 helps with employee comprehension and compliance with recommended controls.

Hierarchy of controls

The following recommendations should be considered for implementation according to the hierarchy of controls. Hierarchy of controls is an approach to hazard intervention that starts with the controls perceived to be most effective and moves down to those considered least effective. In most cases, the preferred approach is to eliminate a hazard or exposures (such as distancing), install engineering controls (such as barriers), and implement appropriate sanitation and cleaning to reduce workers' exposure to the hazard. Until such controls are in place, or if they are not adequately effective or feasible, administrative measures and personal protective equipment (PPE) may be needed.

Ford County and Seward County facility recommendations

1. Screen all entrants (workers/contractors/visitors) who enter the site for COVID-19 symptoms upon entry.
 - Third party medical screening allows site occupational health staff, supervisors, and security to focus on their regular duties and is considered a best practice. Employees should be screened for fever and symptoms associated with COVID-19 infection.
2. Establish a close contact follow-up program per the modified quarantine requirements published by KDHE. According to their guidance, this includes prescreening, regular monitoring under the supervision of the occupational health office, medical check-ins, wearing face coverings, and social distancing as work duties permit.
3. Establish conditions that allow employees to maintain social distancing, especially in common areas like lunchrooms, hallways, and locker rooms. As more employees return to work it is important that a plan or system for staggering breaks, lunches, and shift changes is established to reduce the number of employees in common areas. Some strategies may include expanding the square footage of lunch areas and common areas or installing covered outdoor areas for breaks. Barriers should only be used if social distancing is not possible, due to work design or task to be completed (e.g., two people needing to work together on a single carcass or trimming tasks that need to be done next to one another).
4. Analyze sick leave policies and consider modifying them to make sure that ill workers are not in the workplace. Make sure that employees are aware of and understand these

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policies. Analyze any incentive programs and consider modifying them, if warranted, so that employees are not penalized for taking sick leave.

5. Increase COVID-19 educational messaging. This includes both signage throughout the plant and small group or remote trainings. Signage should be placed in common areas, in locker rooms, and at the entrances to locker rooms and bathrooms. Small group trainings while maintaining social distancing create an opportunity for all employees to hear the same messages and for employees with limited literacy to learn in person.
 - Topics should include (a) recognizing signs and symptoms of infection, (b) how the virus spreads, (c) ways to prevent exposure to the virus, (d) proper handwashing and hand sanitizing, (e) cough and sneeze etiquette, and (f) putting PPE on and taking PPE off safely. All communication and training should be easy to understand and should be provided in languages appropriate to the preferred languages spoken or read by the workers, if possible; and be at the appropriate literacy level.
 - Employers should place simple posters in all languages that are common in the worker population that encourage staying home when sick, cough and sneeze etiquette, and proper hand hygiene practices. They should place these posters at the entrance to the workplace and in break areas, locker rooms, and other workplace areas where they are likely to be seen.
 - CDC has free, simple posters available to download and print, some of which are translated into different languages. The Stop the Spread of Germs poster is available in several languages on the [CDC website](#).
 - Employers should post signs that you can read from a far distance (or use portable, electronic reader boards) that inform visitors and workers of social distancing practices.
6. Add visual cues throughout walkways, common areas, and locker rooms to remind staff to maintain a physical distance between employees. Most existing reminders at the sites are text based and may not be readable by some employees.
 - Practices that have been observed in other plants include markings on both the floor and walls in hallways, cafeterias, breakrooms, and locker rooms to remind employees of social distancing. The markings should have icons and be 6 feet apart rather than containing text instructing people to social distance.
7. Implement a subcommittee in the labor-management safety and health committee to address COVID-19 safety programs and their implementation.
8. Continue to stagger break times and add additional break spaces (possibly outdoors) with appropriate handwashing facilities in order to maintain appropriate worker numbers in common areas during breaks and lunches.
9. Determine if proposed controls, such as barriers between work position on the line, could pose a safety hazard for workers. Ensure that it would not be possible for workers' tools, hands, or arms to be caught between the barrier and moving parts of the conveyor. This may require prototype barriers before implementing them in all workstations where workers cannot be separated by 6 feet or more.

Ford County plant recommendations

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1. Require all employees to wear a cloth face covering or facemask while at work. A face shield cannot replace a face covering. If an employee chooses to wear a face shield, it should be worn with a face covering.
2. Require all employees whose role prevents both (a) distancing from employees around them and (b) the installation of a fixed barrier to wear a face shield in addition to cloth face covering or facemask while working. For example, some positions in packaging and the kill area require being in close contact with adjacent employees and require frequent movement. When introducing the face shield, ensure the following steps are taken.
 - Use videos or in-person visual demonstrations of proper donning and doffing procedures. (Maintain social distancing during these demonstrations.)
 - Emphasize that care must be taken when putting on and taking off face shields to ensure that the worker or the item does not become contaminated.
 - Provide face shields that are either disposable (preferred) or, if reusable, ensure it is properly disinfected and stored in a clean location when not in use.
 - Face shields worn at the facility should not be taken home or shared.
3. Train management about the importance of compliance with face covering requirements and ensure all people on site, including supervisors, wear face coverings appropriately.
 - a. Ask management to oversee face covering use for source control among their supervisees.

Seward County plant recommendation

1. Ensure that if a face shield is worn in place of safety glasses it is rated for impact protection. Only some face shields are acceptable substitutions for eye protection (such as safety glasses) that are used for impact protection; facilities should consult with an occupational safety and health professional concerning the use of face shields.

‘Best Practices’ Observed at Kansas Meat Packing Facilities

Across all five plants we visited in Kansas, we observed ‘best practices’ that included both ways that the CDC/OSHA guidance was implemented as well as practices that extended beyond what was described in the CDC/OSHA guidance. Companies implemented these practices based on their frontline experiences and discussions with other plants, corporate staff, and unions where applicable. (Site location noted with symbol after each observed best practice.) We highlight these ‘best practices in implementation’ to bring awareness to actionable practices that could be utilized:

- Used a third-party medical contractor to screen staff and other visitors to the plant. Post COVID-19 symptoms at the plant entrance in the most common languages spoken at the plant. *
- Screened staff during breaks for fever to identify new onset or masked fevers during the workday. Some companies said this helped employees feel more comfortable and at least

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one plant had identified employees with a fever during these screenings who ultimately tested positive for COVID-19. * ‡

- Lowered the temperature at which the thermal imaging system alarms for fever (99°F) to perform secondary screening. This may increase the sensitivity of a thermal imaging system. *§¶ Sanitized meeting rooms and offices between meetings or trainings. Document this on a posted log to prevent over or under-cleaning, and to assure workers that area has been cleaned and is ready to use. *
- Utilized existing labor-management health and safety committees to implement controls and expand training. Distributed messaging from multiple parties (both union and company). Future messaging was planned to be taken from already developed sources, like KDHE and CDC. *
- Displayed photos and/or videos of extra cleaning and sanitization for employees to see on video monitors or posters in common areas. Management have specifically shared media about cleaning and fogging that occurs at nights and weekends, when most plant employees are not at work. * ‡
- Created an online social media group for employees through which management can share messages to their staff. ‡
- Used a system that can text employees to further distribute COVID-19 prevention and education messages (when available).
- Partnered with a local radio station to help deliver COVID-19 messages to the local community. Continuing to partner with multiple parties (the union and/or non-management employees) to deliver future messaging. ‡
- Installed barriers that are hung on bars that are parallel to the production line. The barriers can be slid parallel to accommodate employees' different work movements and styles. This prevents, as we observed in some places, employees' arms and elbows hitting the barrier with each cut of their task. ‡
- Used a card system at breakroom tables. Each card has one side that is green and one that is red. Employees should sit at tables with green cards and flip them over to the red side when they leave, indicating that the spot needs disinfection. This ensures tables are cleaned between uses and prevents unnecessary cleaning. Implementation will require worker education on the use and purpose of the card. Signs could be posted in the cafeteria in appropriate languages explaining their use. *
- Educated employees in small groups about COVID-19. In-person instruction, when done in small, distanced groups, ensures that all employees receive the same message and that illiterate employees are also offered complete education. *
- Installed signage about COVID-19 at every entrance, hallway, and at bathroom/locker room entrances and exits and on monitors throughout the plant in languages employees understand. Delivered audio messages in hallways in languages employees understand. *§¶
- Made portable toilets and handwashing stations available at overflow outdoor break areas to encourage use and reduce locker room crowding. *§¶

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- Created a space where employees can remove face coverings briefly to make interpretation easier for one-on-one or very small meetings/counseling sessions. The space had physical barriers and was large enough that employees could maintain appropriate distance. §
- Provided handouts with COVID-19 messages for employees to take home with them. The materials came from their corporate office, KDHE, CDC and other organization and were made available in several languages. The messages were available at the plant entrance and exit. ¶
- Reassigned lockers so people in the same shift and/or line were not next to one another to reduce crowding during shift changes. ¶
- Marked all seating (i.e., bench seating in locker rooms) with cues that are 6 feet apart to show employees where they should sit. Blocked off areas where social distancing cannot be maintained. Barriers should not be relied upon to keep people safe in common areas when additional break space can be provided and/or breaktimes can be managed to reduce the total number at break at the same time to fit the break space. ¶

Location where interventions were observed

*Cargill, Dodge City

†National Beef, Dodge City

‡National Beef, Liberal

§Tysons, Holcomb

¶Tysons, Emporia

The plants should continue to consult with USDA to determine if proposed controls are acceptable with regards to food safety and sanitation. KDHE, Ford County Department of Health and Environment, Seward County Department of Health, strategic community partners, and the UFCW Local 2 president and stewards should continue to work together in educating employees about COVID-19 risks and prevention strategies. Thank you for your cooperation with this evaluation. We appreciate your interest in occupational safety and health.

End of memo