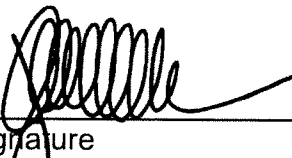


Playbook for Joint Timely Response Protocol for COVID-19 Outbreak in Food Processing Establishments



Signature

Jara McLellan, COVID-19 Response Unit

3 June 2020

Date

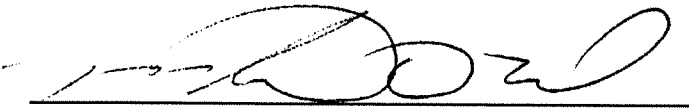


Signature

Lauren Henderson, Assistant Director of Oregon Department of Agriculture

6/3/20

Date



Signature

Michael Wood, Administrator of Oregon Occupational Safety & Health Administration

June 3, 2020

Date

Playbook for Joint Timely Response Protocol for COVID-19 Outbreak in Food Processing Establishments

Purpose

The purpose of this plan is to establish the coordination and response efforts of the Oregon Department of Agriculture (ODA), Oregon Occupational Safety and Health Administration (Oregon OSHA), and Oregon Health Authority (OHA) when one or more cases of COVID-19 are identified in a food processing facility. This coordinated response will help to prevent and slow the spread of COVID-19 and when it's possible, ensure that these facilities can continue to operate while protecting the public's health. When one or more cases of COVID-19 are associated with a food processing facility, notification allows for proactive coordination with all agencies involved to prevent further spread within in a facility.

Definitions

For the purposes of this plan, the following definitions apply:

- "Food processing facilities" or "facility" means facilities licensed under ORS 616, and includes food processing establishments, dairy plants, meat processing, bakeries, food storage warehouses, retail food establishments, and shellfish facilities.

Agency Roles

Local Public Health Authority (LPHA)

Responsible for investigating reportable diseases and disease outbreaks and controlling the spread of disease under ORS 433.006.

Office of Emergency Management (OEM)

Responsible for coordinating and maintaining a statewide emergency services system for emergency and disaster communications.

Oregon Department of Agriculture (ODA)

Responsible for licensing food processing facilities and for administration and enforcement of food laws regarding the production, processing, and distribution of food products or commodities of agricultural origin per ORS 616 to include the sanitary practices in such establishments. Licensing authority is based on predominant activity and shared with OHA per ORS 616.015. ODA staff serve as subject matter experts with existing relationships with food processing facility management. ODA licenses the following types of food establishments; food processing establishments, dairy plants, meat processing, bakeries, food storage warehouses, retail food establishments, and shellfish facilities

Oregon Occupational Safety & Health Administration (Oregon OSHA)

Responsible for ensuring compliance with workplace safety and health regulations and Governor's Executive Orders related to workplaces. Oregon OSHA has a consultation section that provides education and outreach as well as regulatory compliance.

Oregon Health Authority (OHA)

Responsible for establishing rules and investigative guidelines related to the control of disease. OHA works in collaboration with LPHAs and can help sister agencies and facilities related to infection control and disease outbreak management. Can also assist with contact tracing.

- ***Acute and Communicable Disease Prevention (ACDP) & Urgent Epidemiology Response Team (UERT) Epidemiologists***

When an outbreak is identified in a facility, UERT epidemiologists serve as OHA representative for the outbreak. They collaborating with the LPHA to monitor case numbers; manage database documentation; coordinate LPHA requests for specialized outbreak expertise from Senior Health Advisors or the Healthcare-Associated Infections Team; and assume a leadership role in outbreak response if LPHA capacity is limited. They also track outbreak status daily and update the COVID-19 Response Unit (CRU). They are responsible for approving testing at the Oregon State Public Health Laboratory (OSPHL) and provide infection control consultations.

COVID-19 Response Unit (CRU)

The COVID-19 Response Unit is established with the state's emergency response incident command structure, consisting of staff from OHA and Department of Human Services (DHS), that provides resources to support and help LPHAs, the Regional Coalition Support Group (RCSG), ODA, and OSHA respond and coordinate to slow the spread of an outbreak.

- ***Regional Coalition Support Group (RCSG)***

Consists of staff from OHA and DHS that work in collaboration with LPHA, OEM and OHA to identify at-risk facilities, establish situational awareness, support medical surge, and coordinate and support response actions through existing regional coalitions.

- ***Interagency Facility Support Team (IFST)***

Multi-jurisdictional team with staff from OHA, DHS, and agency-specific licensing staff tasked with creating an action plan and implementation using state or federal resources in the event of emergency scope exceeding Regional Coalition Support Group capacity.

COVID-19 Positive within Food Processing Facility Response Protocol

The following section outlines the process in which agencies will respond to a food processing facility that is confirmed to have one or more COVID-19 positive employees and the process for escalation to CRU. This plan will provide proactive support to limit further spread of COVID-19 in the facility and community and to ensure the continuation

of safe food production at the facility. Each agency's response process is outlined below including the process when additional resources need to be requested.

The identification of a COVID-19 positive employee in a facility will primarily come from LPHAs through case interviews or contact tracing. However, there may be circumstances where other agencies or entities are aware of a situation prior to the LPHA. If that happens, the agency would provide information to OHA to work with the LPHA to begin the coordination and response efforts.

Considerations for Food Processing Establishments

Seasonal or perishable commodities have an element of timing that is very sensitive to delay and may require specific and timely handling. If a facility needs to shut down operations in order to control the spread of disease and protect the public's health, it may result in catastrophic food supply chain failures or have other consequences that are unique to this sector, including:

- Supply chain vulnerability / limited availability
- Storage capacity limits
- Labor seasonality and availability
- Crop destruction

Food processing facilities are unique operations, some potential items to consider when planning a response and resource needs include:

- Operations in multiple counties
- Manufacturing operation continuity
 - Physical distancing in manufacturing
 - Shift work & 24/7 operations
 - Departmental separation: maintenance, sanitation, production, harvest, quality assurance/control, administration
 - Crew cohorting/grouping by worker job duties
 - Multiple production lines, buildings, and facilities/locations
 - Varied locations and working conditions
- Labor housing considerations
- Visitor and contractor policies
- Worker education and outreach with consideration for language or cultural barriers that may exist
- Workforce leave and incentive policies (sick leave, flexibility on leave, etc.)
- High-skill job duties
 - Maintenance
 - Sanitation
 - Technical operational requirements
 - Quality labs
- Availability of PPE or testing resources
- LPHA coordination if testing of employees is needed

Oregon Health Authority Acute and Communicable Disease (ACDP) Urgent Epidemiology Response Team (UERT) Response Protocol

When an LPHA finds a positive COVID-19 case associated with a facility, OHA's COVID-19 investigation guidelines require a LPHA to input that information immediately into the state's reportable disease database (Orpheus) and to notify OHA UERT. Once OHA UERT is aware of a case associated with a facility, it will immediately share a summary of the situation including: case volume, infectious period dates, any facility prevention measures in place, issues of concern associated with the facility, and any other pertinent information.¹

Oregon Department of Agriculture Response Protocol

Once ODA has knowledge of a confirmed COVID-19 positive case associated with a facility, as the licensing authority, ODA will assign the local food safety inspector to coordinate. The inspector will help with contacting the facility and scheduling a consultation with Oregon OSHA, OHA and the LPHA, which may include an on-site visit.

The purpose of the consultation is to:

- Assess potential impacts to food safety practices
- Support the facility in communication and coordination
- Conduct facility food safety risk assessment
- Provide resources to the facility e.g. toolkit
- Collaborate on next step for outbreak prevention

Following the consultation, ODA will provide its assessment report to Oregon OSHA, OHA and the LPHA, and continue to monitor and provide assistance as necessary.

Oregon OSHA Response Protocol

- Holt Andron or Roy Kroker with Oregon OSHA will be notified by OHA or ODA when there is a positive COVID-19 case associated with a facility.
- An Oregon OSHA consultant will then be assigned to participate in the facility evaluation process in an advisory role to the notifying agency (OHA or ODA). The consultant will conduct a hazard assessment following applicable agency guidelines with a focus on ensuring the employer is abiding by COVID workplace safety requirements. Oregon OSHA's participation in an advisory role is distinct from Oregon OSHA's voluntary service to employers to provide a comprehensive consultation.
- Based on information gathered during its participation in an advisory role during the virtual evaluation and/or worksite visit, Oregon OSHA will assist employers in

¹ OHA's investigative guidelines will also require the LPHA to do the following:

- Notify the facility, preferably the Human Resources (HR) Department, that there is a COVID positive result associated with the facility, and provide information regarding immediate measures the facility can take to limit the spread of the disease, the playbook and toolkit information. If there is more than one confirmed or suspect case associated with the facility, that information will be shared with the facility as well.

establishing adequate workplace hygiene following the hierarchy of controls if deficiencies are identified.

- Oregon OSHA will provide a written report of its observations of the worksite visit when acting in an advisory capacity to ODA, OHA and the LPHA. They will also provide a draft executive summary of observations to share with the employer, including any issues found on-site, which may include information supplied by ODA and OHA. This document, prepared by Oregon OSHA in its advisory capacity, is not confidential.
- Oregon OSHA will maintain an advisory role unless the employer requests a comprehensive consultation by Oregon OSHA's Consultation Section or Oregon OSHA's Enforcement Section receives a complaint or referral.
- Upon an employer's request, Oregon OSHA's Consultation Section may provide a comprehensive consultation to the employer. With the consent of the employer, Oregon OSHA may share its report to the employer with ODA or OHA.
- If a complaint or referral is received, Oregon OSHA's executive team will evaluate it to determine if the Consultation Section must withdraw from its advisory role or comprehensive consultation process to facilitate an investigation by the Enforcement Section.
- If engaged to investigate, the Enforcement Section will be notified of the other state agencies involved and their contacts.

Request to COVID-19 Recovery Unit (CRU) Response Protocol

If during a coordinated response an agency identifies that additional support or resources are needed to assist in preventing or slowing the spread of disease, including supporting employees at the facility, the RCGS should be contacted. The RCGS will complete a mission analysis that includes an assessment of the risk of instability based on:

- Number of COVID-19 + employees
- Continued exposure and increase in COVID-19+ employees
- Continued risk of food processing ability not meeting production demands
- Continued risk of community and cross-community exposure
- Contact tracing ability and response
- Testing resources
- Continued concern and lack of precautionary measures being effectively established and implemented
- Facilities response and willingness to coordinate safety efforts with LPHA, ODA and RCGS

The RCGS supervisor will provide a status update to the CRU directors based on the mission analysis.

COVID-19 Response Unit Interagency Facility Support Team (IFST) Response Protocol

Upon review of the RCGS mission analysis, the CRU will determine whether further escalation is necessary and whether an IFST needs to be activated. The decision will also be based on:

- Whether the facility will have increased supply chain instability
- Risk for further instability
- Risk that facility might have to close within 36 hours
- Potential of increased spread of outbreak in facility

IFST: Develop Initial Evaluation and Action Plan

- The members of the IFST will include at a minimum:
 - OHA Incident Management Team leadership
 - CRU leadership
 - IFST lead
 - Regional Coalition Support Group
 - ODA Food Safety Program
 - Oregon OSHA
 - LPHA/ UERT
- The IFST will use the Initial Action and Planning template to collect key information in an initial meeting. The expectation is that all areas of the form are completed, noting NA if not applicable. Additional areas may be added if relevant to the plan and the incident being mitigated.
 - The IFST determines the actions that are believed to be necessary and any support needed from ODA, LPHA, Oregon OSHA and/or OHA in order to implement the desired strategy.
- Once all key information is gathered, IFST should agree on an action plan. See Appendix 2 for possible action plan items.
- The IFST may involve the CRU directors for additional support when needed.
- The IFST may make requests to the Incident Command as outlined in the IFST Playbook.
- Daily updates on the action plan will be prepared by the IFST lead and reported to the CRU directors, OHA UERT lead epidemiologist and Incident Commander each day, until the action plan has been completed.

Strategies for the IFST to consider

These are potential strategies for IFST to consider to be implemented by ODA, Oregon OSHA, and CRU:

1. Review of toolkit resources and precautions
2. Coordinate with food processing facility for testing of employees
3. Evaluate systems in place for prevention of employee exposure (Oregon OSHA)
4. Support food processing facility with labor resources

5. Facility infrastructure support
 - a. Product storage
 - b. Alternative processing option
6. Enforcement recommendations
 - a. Citations
 - b. Force closure

Facility COVID Response Protocol Flow

See document titled:

Process Map - Mobilization of Interagency Facility Support Team 5-21-20 V5.pdf

Appendix 1 - Contact list

Oregon OSHA

- Holt Andron, Field Consultation Manager
503-798-5143, holt.andron@oregon.gov
- Roy C. Kroker, Consultations / Public Education Manager
971-718-1179, roy.c.kroker@oregon.gov

Oregon Health Authority Acute and Communicable Disease (ACDP) Urgent Epidemiology Response Team (UERT) Response Protocol

After hours and weekends, the facility should contact the duty officer:

- State of Oregon, Public Health Duty Officer
Voice/text: 971-246-1789, PHP.DUTY-OFFICER@state.or.us

Oregon Emergency Response System

- 800-452-0311

Oregon Department of Agriculture

- Primary email: Fsd-managers@oda.state.or.us
- Rusty Rock, ODA Food Safety Program Field Operations Manager, 503-508-2262, rrock@oda.state.or.us
- Isaak Stapleton, ODA Food Safety Program Director, 503-798-7789, istapleton@oda.state.or.us

Appendix 2 – Action Plan Items

Listed below are potential action plan items for the IFST to consider when developing an action plan:

- Contract Nurses / clinical staff
- Contract housing
- Contract employees
- Contract transportation
- Testing / lab availability
- Educational materials
- Multiple language support
- Storage facilities for inbound and work-in-progress
- Supplies
 - PPE / masks
 - Cleaning chemicals / disinfectants
 - Hand sanitizer
 - Barrier materials

- What may be needed from the CRU IFST?
- Are there suggested strategies listed below which the IFST should consider when developing an action plan?
- Has urgency of situation been communicated to IFST within recommendation, specifically around type
- Number of employees needed
- Migrant / H2A workforce
- Existing protocols and effectiveness in establishing control