

MAY 2020

▶ MANUFACTURING FACILITIES AND OPERATIONS

New Operational Practices to Consider in the Time of **COVID-19**

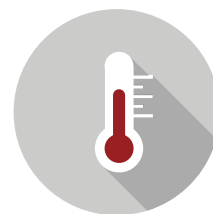
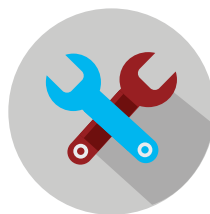
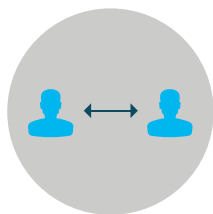
The following is a collection of emerging strategies and new operational practices that many leading manufacturing organizations of all sizes are considering and/or implementing to guide their workplaces and employees safely through the pandemic.

These practices are being shared to assist manufacturers taking steps within their facilities to meet or exceed Centers for Disease Control and Prevention and Occupational Safety and Health Administration guidelines and recommendations, while also mitigating operational and business risks that are outside the scope of such guidance. This information is not meant as authoritative legal, medical or regulatory guidance or advice. It is not an exhaustive list of operational practices in the COVID-19 environment but rather represents some of the most common “best practices” communicated to the National Association of Manufacturers.

SITE ACCESS TO MITIGATE EXPOSURE

1. Many sites have eliminated all visitor access or are only allowing third-party visitors if they are critical for ongoing operations (i.e., maintenance or service technicians).
2. Some companies are using self-certification questionnaires for staff and/or guests. These must be completed before the person is allowed on site, and they require the individual to certify that he or she is free of specific symptoms and has not knowingly been in contact with anyone testing positive for COVID-19 or showing specific symptoms in the past 14 days. They also ask to disclose recent travel or to certify that no recent travel has occurred to specific “hot spots.”
3. Facilities that use temperature screening report doing the following:
 - Staff who perform the temperature screenings are outside the facility at a special checkpoint and are trained on how to use the equipment and outfitted with special medical personal protective equipment.
 - Temperatures are taken with a nontouch laser device.
 - The company decides what temperature level is permissible, with the common thresholds at 99°F or 100°F. The CDC defines a fever as a body temperature at or above 100.4°F.
 - Any staff with a reading above the allowed threshold is asked to return home and does not enter the workplace.
 - Neither temperature readings nor employee names are recorded to maintain privacy.
 - Measures should be taken to protect the privacy of workers while receiving tests and if they test positive when leaving the facility.
 - Companies should consider whether federal and state wage and hour laws require that the time workers spend waiting in line is compensable.

WORKSTATION MEASURES TO PROMOTE SOCIAL DISTANCING



1. Companies are working to ensure that, if possible, all workers are stationed at least six feet or more from their nearest coworker.
2. Some companies have slowed production lines intentionally to make the appropriate social distancing feasible.
3. When six feet of distance between workstations is not feasible, some are using plexiglass or vinyl barriers between workers coupled with workplace-appropriate face coverings for employees in these types of workstations.
4. The CDC recommends wearing facial coverings, such as cloth masks, at all times in manufacturing facilities. This would not only help to limit possible human-to-human transmission but also help to reduce the chance of surface or airborne contamination.
5. Companies are using higher-grade PPE when the six-foot recommended radius is not possible.
6. Preexisting PPE that was required before the pandemic—such as hard hats, goggles, gloves, etc.—was likely never shared between staff. But companies are ensuring that policy should be strictly communicated and enforced now, and some require that all PPE should be disinfected daily by either the company or the employee.
7. Many companies have also banned sharing other types of wearable or high-touch equipment, such as headsets and remote controls.
8. Some are implementing additional protective coverings—such as keyboard covers—and allowing employees to bring their own to each shift and then take it home for cleaning each day.
9. Companies are usually requiring significant cleaning and disinfecting of all high-touch surfaces at a workstation at the beginning and end of a shift.
10. If more than one person uses a workstation during a shift, then the cleaning and disinfecting regimen is usually more frequent.
11. Any shared tools are usually disinfected before the next employee uses them, whether that is within a shift or between shifts.
12. A deeper cleaning of the entire work area is often standard each night or weekly, depending on many factors, including number of workers, types of surfaces, environmental conditions, etc.
13. Some companies are scheduling daily cleaning crews to come through facilities during the day, rather than at night, to show employees that safety measures are being taken.

FACILITIES AND TRAFFIC MANAGEMENT

1. Companies are limiting and discouraging congregation of staff in any area where they must be closer together than six feet and/or with poor ventilation characteristics.
2. Cafeterias and break rooms are frequently either closed, or they are rearranged in reduced seating formations

to prevent people from sharing tables. In some cases, staff are asked to take breaks or eat lunches in their cars to maintain separation while getting off their feet. Companies are using ample signage to communicate room occupancy limits.

3. Companies are seeking to install touchless appliances wherever possible—including all sinks and paper towel holders.
4. Major emphasis is placed on frequent hand washing or hand sanitizing, and, when possible, the appropriate sinks or supplies are located throughout the facility to accommodate the increased frequency.
5. Companies are focused on cleaning restrooms more frequently, and some toilets or sinks may be blocked off to help maintain social distancing.
6. Wherever possible, doors are propped open to eliminate a frequent touchpoint for many staff hands. Other companies are installing hardware that allows workers to open doors with their forearms or with a foot pedal.
7. Hallways and other walkways through buildings may be designated as one-way to reduce close-proximity passing of staff.
8. Some companies are increasing the use of radios, text messages and email to reduce staff movement and face-to-face communication.
9. Time clocks can cause crowds to form, and many companies have reported the following measures to help alleviate that issue:



Replacing the traditional technology with something that is touchless—linked perhaps to each employee's cell phone or a wrist band, etc.



Installing additional time clock stations in the facility



Staggering start and end times within a shift so that the time clock usage is less intense at any one time



Placing social distancing markers on the floor to guide the line formation and proper spacing of those waiting to clock in or out

SHIFT AND TEAM DESIGN

1. Many companies realize that any worker may get infected or sick at any time, no matter where the exposure occurs. They, therefore, endeavor to ensure that each worker is only interacting with a very limited number of coworkers to minimize the number of people who might be exposed in the workplace and then quarantined or infected as a result.
2. Increasing the time between shifts allows for policies that ensure all workers from one shift are off premises before the next shift arrives, preventing incidental contact between workers on different shifts.
3. Some facilities have divided workers within the same shift into specific smaller work teams. These teams may be designated with a specific marked floor area in the facility or designated by color of uniforms or other visual cues. Workers may need to interact at closer distances with those on their designated team, but they explicitly do not do so with members of any other team.
4. Hand-offs are often a critical and normal part of factory operations; everything from clipboards to raw materials

to forms or tablets may be regularly passed from one staff to another to facilitate work and all the tracking and reporting that goes with it. Each hand-off should be evaluated from a virus transmission risk perspective and, where possible, reworked to be as distant and touchless as possible.

ILLNESS OR DIAGNOSIS RESPONSE

1. An important consideration is to design a plan for how an employee who reports feeling ill in the workplace will be isolated and cared for—and to make accommodations for privacy when requiring an employee to leave.
2. Consider and plan for how an employee's positive COVID-19 test or likely infection due to symptoms will be handled. What contact tracing among other staff will be carried out and by what means? How will the employee's privacy be protected?
3. Determine what facility-related steps will be taken if an employee recently on-site is assumed to be infected. Will the facility close in total or in part? What cleaning and disinfecting protocols will be followed? What communications will go out to employees?
4. As a representative of a community facility, consider developing a working relationship with county health officials so that reporting and mitigation can be addressed smoothly and proactively.

ESSENTIAL TRAVEL POLICIES

1. Companies are adopting various policies for essential staff travel. Examples include using only personal vehicles instead of rental cars, providing protocols for cleaning/disinfecting hotel rooms upon check-in and establishing dining policies, such as takeout or delivery only. Additional considerations include the use of PPE and social distancing protocols while on a remote worksite.
2. When sending workers to customer locations, companies are focusing on communicating clearly with customers on safety protocols and inquiring about their own on-site practices.





RETURNING NONESSENTIAL WORKERS

1. Companies are determining which workers should return to the workplace based on their effectiveness working remotely versus on-site. They are typically prioritizing those roles with greater on-site effectiveness.
2. Other considerations include the distance the employee would be traveling to work, his or her own health status or health status of family members (such as being immunocompromised or having other underlying health conditions or risk factors) and whether the employee would need to take public transit to get to the workplace.
3. Companies are communicating clearly and regularly with employees about on-site safety protocols in advance of their return.
4. Companies are monitoring reintegration and reinforcing protocols and policies as necessary.
5. Explaining the return-to-work philosophy of the company can be helpful in addressing employees' concerns.

Legal Disclaimer:

The information contained in this document does not constitute legal or medical advice. The practices outlined here are meant as examples, and the NAM bears no responsibility with respect to third-party reliance on the recommendations set out herein. All employers should consult with local legal counsel and regulators specific to their jurisdictions and industries in developing strategies applicable to their unique workplaces.

