COVID-19: Modifications to Seasonal Farm Labor Camp Requirements

This guidance document is to outline best practices to maintain the health and safety of seasonal farm workers, including those working under the federal H2A labor program. Implementation of these guidelines is essential for any owner and/or operator of a Seasonal Farm Labor Camp Permit with the Department of Agriculture to protect workers by minimizing the risk and potential exposure of COVID-19 throughout Pennsylvania.

All life sustaining businesses operating in Pennsylvania must follow the April 15, 2020 Department of Health order directing protections for critical workers that are employed at businesses authorized to maintain in-person operations during the COVID-19 disaster emergency.

HOUSING REQUIREMENTS

The following provisions should be implemented in relation to the living quarters provided to seasonal farm workers, including housing accommodations, motels, dormitories, and mobile homes:

- Ensure housing capacity does not exceed your Seasonal Farm Labor Camp Permit allowance per Chapter 82 regulations.
- Recommendations from the Center for Disease Control (CDC) is a minimum of six feet between beds or bunks.
  - If the current housing unit does not allow for segregation of workers under social distancing guidelines, arrangements may be needed to secure additional housing such as rental units at motels and hotels.
  - Position beds so that workers sleep head-to-toe to limit exposure to respiratory droplets.
  - Provide additional cloth facemasks to employees to wear while in their housing.
- Adequate ventilation must be provided in habitable rooms.
  - 45% of the window area shall be openable or an operable device is provided to supply ventilation (§82.5(f)(2)). Properly fitted screens shall be provided for every openable window (§82.5(f)(3)). If a doorway if used for ventilation, a properly fitted screen door shall be provided (§82.5(g)).
- Ensure bathrooms and other sinks are consistently stocked with soap and drying materials for adequate handwashing.
- Provide hand sanitizer when soap and water are not available.

ROUTINE CLEANING AND SANITIZING

Housing units should be clean and kept in sanitary conditions at all times (§82.6(a-b)). Cleaning and sanitizing of high contact areas is a priority to prevent the spread of COVID-19 if an area would become affected by an individual with the virus. Cleaning removes dirt and soiled
Residue while sanitizing kills remaining germs on surfaces through chemical application. Both are required to effectively disinfect surfaces and reduced the spread of disease.

- Ensure **high contact surfaces are cleaned and sanitized on a routine basis**. Time needs to be allocated for all cleaning, with greater and more frequent emphasis on frequently touched surfaces including tables, chairs, doorknobs, light switches, handles, toilets, faucets, sinks, and field equipment.
- **Routine cleaning can be performed with household cleaners and EPA-registered disinfectants** that are appropriate for the surface. Follow label instructions for safe and effective use of the cleaning product including precautions when applying the product, such as wearing gloves and proper ventilation during use of the product.
- **Ensure essential supplies for cleaning, sanitizing, and handwashing are available** in all living quarters and worksites.
- Designate a specific individual(s) responsible for ensuring workers comply with health and sanitation requirements.
- Designate a trained individual(s) who is responsible for disinfecting housing units and frequently used equipment or tools.

### WHAT TO DO IF AN EMPLOYEE IS DIAGNOSED WITH COVID-19

COVID-19 is known to be spread via respiratory droplets and there is currently no evidence that the disease is spread by food. Once an employee is diagnosed with COVID-19, priority is to prevent further spread to other individuals.

- Send employee back to their housing unit.
- Contact your local health department and follow protocols discussed. Employers should consult with the local health department if the worker is unable to communicate in English.
- Clean and disinfect affected areas.
- Identify employees who were in close contact (within about 6 feet for about 10 minutes) with a person with a probable or confirmed case of COVID-19 from the period 48 hours before symptom onset to the time at which the patient isolated:
  - Contact the identified employees and notify them of their potential exposure while maintaining confidentiality
  - If the employee remains asymptomatic, the person should adhere to the practices set out by the CDC in its April 8, 2020 [Interim Guidance for Implementing Safety Practice for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19](https://www.cdc.gov/epiinfo/COVID-19/index.htm).

### QUARANTINE HOUSING ACCOMODATIONS

Have a plan in place for housing in the case that a worker(s) displays COVID-19 symptoms. Symptoms of COVID-19 include fever, cough, or shortness of breath. Ill persons must be isolated from other occupants. Confine workers with mild respiratory symptoms consistent with COVID-19 infection to individual rooms, if possible, and have them avoid common areas. Temporary housing may be needed to limit exposure to other workers.
• Designated areas for quarantined employees should be provided with separate sleeping, cooking, and bathing facilities.
• Ensure appropriate Personal Protective Equipment (PPE) such as masks for workers who develop COVID-19 symptoms or test positive are properly worn to prevent the spread of the virus to others.
• Ensure quarantined workers have sufficient food, supplies, and transportation to medical care.

COVID-19 CLEANING AND SANITIZING

Thorough deep cleaning of the housing unit is required after a worker is confirmed to have COVID-19. The following procedures should be implemented to ensure proper disinfection of the housing and work areas.

• If possible, open the windows and doors of the housing unit or use ventilation fans to increase air circulation in the area. Wait 24 hours or as long as practical before beginning cleaning and disinfection.
• Following the following procedures for areas where ill workers are being housed in quarantine:
  - **Hard (non-porous) surfaces**
    - If surfaces are dirty, they should be cleaned first using a detergent or soap and water prior to disinfection.
    - For disinfection most common EPA-registered household disinfectants are expected to be effective against COVID-19. Follow the manufacturer's instructions for all cleaning and disinfection products (concentration, application method and contact time, etc.).
    - Properly diluted household bleach solutions (at least 1000ppm sodium hypochlorite) can also be used if appropriate for the surface to effectively protect against coronavirus. Follow manufacturer's instructions for application, ensuring a contact time of at least 1 minute, and allowing proper ventilation during and after application. Do not use expired products nor mix household bleach with ammonia or any other cleanser.
      - Prepare a bleach solution by mixing:
        • 5 tablespoons (1/3 cup) bleach per gallon of water or
        • 4 teaspoons bleach per quart of water
  - **Soft (porous) surfaces**
    - For surfaces such as carpets, rugs, and drapes, remove visible contamination and clean with cleaners appropriate for use on these surfaces.
    - If the items can be laundered, wash items in accordance with the manufacturer’s instructions using the warmest appropriate water setting for the items and dry completely.
    - [EPA-registered disinfectants](https://www.epa.gov) suitable for porous surfaces can also be used.
• In areas where ill workers have been or used, continue routine cleaning and disinfection as described above in this guidance.

RETURNING TO WORK

• The local health department will monitor the affected individual during quarantine until their recovery and will be involved in clearing the employee to return back to work.
• The PA Department of Health (DOH) is recommending that persons with COVID-19 under home isolation be released from isolation after a minimum of 7 days from symptom onset and after 72 hours of feeling well and without a fever.
• People with laboratory-confirmed COVID-19 who have not had ANY symptoms may discontinue home isolation when at least 7 days have passed since the date of their first positive COVID-19 diagnostic test and if they have had no subsequent illness.
• After returning to work, employees must maintain good personal hygiene including handwashing procedures and frequencies.

WORKSITE REQUIREMENTS

It is possible COVID-19 can survive on surfaces or objects; however, there is no evidence at this time to support food produced in the U.S. can transmit the virus. Regardless, steps need to be taken to minimize the spread of the disease especially during the harvesting, picking, packing and distribution of agricultural commodities seasonal farm workers handle. Therefore, access to sufficient sanitizing and handwashing supplies is essential at worksites.

• Incorporate social distancing of at least 6 feet between workers whenever possible.
• **Stagger shifts** to minimize the workforce in the field at the same time.
• Provide sufficient amount of space for workers to have breaks and meals. Arrange seating to have workers facing forward and not across from each other in eating and break settings.
• **Avoid congregating groups** in confined areas.
• The use of **simple cloth face coverings** is recommended to slow the spread of the virus and prevent people from transmitting it to others. Cloth face coverings should:
  - fit snugly but comfortably against the side of the face
  - be secured with ties or ear loops
  - include multiple layers of fabric
  - allow for breathing without restriction
  - be able to be laundered and machine dried without damage or change to shape
• **Employers should provide face masks for employees** and educate workforce on the mandatory requirement to wear masks while on the worksite for their protection and the protection of others. The only exception to mask use is when an employee is eating or drinking on break.
• Ensure sufficient restrooms and handwashing facilities are available at the worksite.
• Ensure daily sanitization of these bathroom and handwashing facilities, vehicles used to transport workers, and any equipment or tools utilized by workers.
• **Schedule handwashing breaks every hour.** Employees should wash hands with soap and water for at least 20 seconds. If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains 60%-95% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.
• Cover coughs or sneezes with your elbow.
• Provide tissues and no-touch disposal receptacles.
• Advise workers to avoid touching their eyes, nose, and mouth with unwashed hands.
• Designate a specific individual(s) responsible for ensuring workers comply with health and sanitation requirements.
• **Post guidance,** in a language understood by the workers, informing workers of best health practices, including handwashing frequency and personal hygiene practices.
TRANSPORTATION

Transportation is required for workers to travel from their housing units to their worksite, purchase essential supplies such as food, launder personal items, and provide access to toilet facilities at a duration and distance as outlined in Chapter 82 Seasonal Farm Labor Camp regulations. These recommendations will help maintain social distancing and safety during transportation of farm workers.

- Limit the number of workers transported at one time, maintain 6 feet physical distancing in vehicles whenever possible, and ensure workers are not sitting directly next to each other. Additional driver(s) may be needed to drive and transport workers to allow for social distancing.
- Provide and transport workers in vehicles with functional ventilation systems or operable windows.
- Designate a trained individual(s) who is responsible for disinfecting transportation vehicles on a routine basis, but no less than daily cleaning.
- Schedule trips in advance to the grocery stores to limit the number of workers in a bus or in the community at any one time. Share information about grocery delivery options and encourage employees to consider using these services whenever possible to limit risk of exposure.
- The Centers for Disease Control (CDC) recommends wearing cloth face coverings in public settings in addition to social distancing measures, especially in areas of significant community spread, to mitigate against COVID-19.

Your workforce is your greatest asset. Please make smart decisions that will allow your life sustaining work to continue without increasing risk.

For more information on COVID-19:
- [CDC Guidance for Cleaning and Disinfection for Community Facilities](#)
- [FDA COVID-19](#)
- [USDA COVID-19](#)
- [PA Department of Agriculture COVID-19 Resources and Guidance](#)
- [PA Department of Health COVID-19](#)