RECOMMENDED COVID-19 PROTOCOLS
(As of June 9, 2020 – V.2)

This is an update to the previous recommendations for warehouses released on April 16, 2020. Version 2 contains a new section on reopening, the most recent advice from the CDC and other authorities, and is updated to remove duplicative information.
**BACKGROUND**

Pharmaceutical wholesale distributors are part of our nation’s “critical infrastructure” and must remain operational to preserve patient access to lifesaving medicines. Nevertheless, COVID-19 has impacted operations by limiting warehouse access, temporarily closing facilities and fragmenting work forces, with some employees continuing their critical warehouse functions and others furloughed or working from home. As shelter-in-place and stay-at-home restrictions begin to ease, and businesses begin to operate under a “new normal,” wholesale distributors will be considering how to address important questions, such as:

- How do I protect my warehouse associates and other employees from disease so that we continue to deliver critical, lifesaving medicines to healthcare professionals and patients?
- How do I protect warehouse associates and other employees that become ill or who may have been exposed to someone that is COVID-19 positive?

Recognizing the global COVID-19 pandemic and high person-to-person transmissibility of this respiratory virus, this document highlights key recommendations from the Centers for Disease Control and Prevention (CDC), the Food and Drug Administration, the Occupational Safety and Health Administration (OSHA) and other authorities on:

- What to consider as facilities began to reopen and warehouse operations begin to normalize to protect warehouse associates and other employees from contracting coronavirus;
- Steps to be taken when an employee tests positive for COVID-19 or has symptoms associated with COVID-19;
- Steps to be taken when an employee/facility visitor has been in close contact to an individual who is or may be positive for COVID-19; and,
- Cleaning and disinfection guidance from the CDC.

**NOTE:** A pharmaceutical wholesale distributor should review state and local requirements and guidelines that may supersede CDC or other federal government guidance. This document is not intended to and does not replace or supersede any obligations the company has under federal, state or local law.

COVID-19 is rapidly evolving. The recommendations and information contained here could change, and it is important for businesses to stay current on COVID-19 developments.

This document is based on the advice of public health authorities for the protection of the valued employees who are working in critical infrastructure industries during this challenging time. Other, equally protective, approaches are possible. Each wholesale distributor will need to consider how and whether this information can be adapted to its own business and its efforts to both protect its employees and continue to assure that patients receive their needed medicines during the COVID-19 pandemic.
Since early March 2020, individuals and businesses have drastically curtailed activity to help slow the spread of SARS-CoV-2 and the disease it causes, COVID-19. As state and local stay-at-home and safer-at-home restrictions begin to ease, businesses are all assessing how to “return to normal” while still also protecting employees and customers. The CDC’s “Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes” states that “reopening America requires all of us to move forward together by practicing social distancing and other daily habits to reduce our risk of exposure to the virus that causes COVID-19. Reopening the country also strongly relies on public health strategies, including increased testing of people for the virus, social distancing, isolation, and keeping track of how someone infected might have infected other people.”

As designated critical infrastructure, pharmaceutical wholesale distributors have continued to distribute needed medicines and healthcare supplies throughout the pandemic. Nevertheless, wholesale distributor operations have been impacted. The considerations described below are intended to guide wholesale distributors in developing their plan for reopening and normalizing operations that can help protect employees and warehouse associates and minimize the risk of widespread exposure if someone does become ill.

a. General Considerations

- Confirm that operations are compliant with state and local health and reopening requirements and guidance.
- **Have ongoing communications and posted signs** on how to stop the spread of COVID-19 and promoting everyday protective measures.
- Provide employees with PPE appropriate for their work, including face coverings/masks and gloves and educate them in proper use, or allow them to bring personal protection from home if none is available due to shortages.
- If possible, stagger shifts or otherwise arrange schedules to minimize the total number of persons on site during shifts.
- Many warehouses have, as company policy, not permitted anyone except warehouse associates onto the premises. As facilities reopen, all visitors and returning personnel should be closely monitored for the continued health of associates in the warehouse. A daily approved visitor log should be maintained, including date, time and contact information of the visitor. Records should be maintained of who the visitor met with.
- Anyone entering the facility should wear face coverings and maintain physical distancing.
- No handshake greetings or physical displays of affection should be permitted.
b. Warehouse Facilities

- Map out work areas to determine the best means for social distancing of at least six feet. Mark distances on the floor and workstations.
- Conduct essential meetings by telephone or video conference, or move the meeting to outdoors with social distancing of at least six feet.
- Identify all high touch surfaces and ensure they are cleaned and disinfected on at least a daily basis and between shifts. Disinfect all shared tools, as well as likely touch surfaces on equipment and machinery (e.g., forklifts operating controls as well as likely touch points when entering the driver’s seat) between changes of operators and at the end of each shift. (See also Section V on cleaning procedures.)
- Consider the level of noise in the warehouse and how associates can communicate with one another without having to talk loudly or shout.
- If there are two-person jobs that do not allow for six-foot physical distance, determine what additional measures can be taken besides face coverings, such as plastic partitions.
- Consider how associates are coming to work and reduce car and van pools where possible.
- Encourage associates to wash clothes, gloves and face coverings daily.

c. Product Deliveries

- Consider how to maintain social distance between associates and delivery drivers. Try to implement contactless procedures or install partitions.
- Facilitate electronic documentation exchange.
- Drivers entering the facility should wear face coverings and should remain in the truck while it is loaded or unloaded.
- Evaluate delivery and loading dock processes to minimize warehouse associates sharing any materials with drivers. Measures may include associates using their own pens, disinfecting touchpads before and after use, and isolating paperwork in sealed containers.
- Request that suppliers provide the measures they are taking to protect your associates (e.g., how they are cleaning and disinfecting trucks, how they are monitoring driver health, etc.).

d. Making Deliveries

- Disinfect likely touch points in delivery vehicles and equipment (e.g., vehicle cab, operating controls, mounting grab bars, armrests) before and after delivery.
- Provide hand sanitizer in the truck.
- Delivery drivers should wear face coverings.
• To the extent possible, drivers should practice contactless delivery and not come within six feet of another person during the delivery.

• Drivers should use minimize sharing any materials with others. Measures may include drivers using their own pens and disinfecting touchpads before and after use. Ideally, all documentation will be accomplished electronically. Any documentation drivers must receive should be placed in a sealed envelope, bin or similar container if it is kept in the cab of the truck.

• Provide instructions on what drivers should do regarding practices at rest stops to minimize potential exposures.

e. Screening and Temperature Check Tips for Employees

• Implement a screening protocol (e.g., CDC guidance and practices) for each day an employee or visitor comes to the facility.

• Whether at home or before they enter the facility, each employee should:
  » Take their temperature; and,
  » Answer a medical questionnaire about whether they have any COVID-19 symptoms or have had close contact with someone diagnosed with COVID-19).

f. Other Measures

• Evaluate potential exposure risks in common areas and shared spaces, such as break rooms, waiting rooms, lunchrooms, locker rooms and restrooms. Implement social distancing through measures, such as limiting occupancy (e.g., no more than 10 in a room at one time); increasing distance between tables/chairs; staggering breaks; installing partitions; and moving break and lunch areas outside. Increase cleaning frequency in these areas as discussed in Section V.

• Limit self-serve food and drink options, such as coffee and drink stations.

• Provide adequately stocked handwashing facilities with paper products and/or hand sanitizer at key locations, including entrances/exits, common areas and other high-traffic locations throughout the facility.

• Position paper towels and trash cans at bathrooms and other locations where doors must be opened and closed by touching handles.

• Employees should not share any equipment or objects that are used near the mouth or nose, like headsets, microphones, radios or utensils.
STEPS TO BE TAKEN WHEN AN EMPLOYEE TESTS POSITIVE FOR COVID-19 OR HAS SYMPTOMS ASSOCIATED WITH COVID-19

COVID-19 is widely circulating in the U.S. Despite the best efforts of an employer, an employee may contract the disease. The considerations below will help in managing this situation should it arise. This guidance comes from the CDC’s “When You Can be Around Others After You Had or Likely Had COVID-19” and “Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings.”

a. If an Employee Has a Confirmed or Probable COVID-19 Diagnosis

- Employee screening measures discussed in Section II.e. should be in place.
- If an employee has symptoms associated with COVID-19 or is diagnosed with COVID-19 after receiving a positive test:
  - If the employee is on site, send the employee home immediately.
  - If the employee is at home, the employee should not come to work.
- Employees should be encouraged to contact the local health department and seek medical attention upon initial appearance of symptoms.
- Employees should notify their supervisor if they become ill.
- If the sick employee was in the facility, it will likely be necessary to implement the cleaning protocols described in Section V.
- Information on persons who had contact with the ill employee during the time they had symptoms and two days prior to symptoms should be compiled.
  - Pharmaceutical distribution facilities often have procedures that limit access to the warehouse, whether in whole or in part, depending on the employee and the jobs they perform. Management may be able to track key card access, for instance, or examine calendar appointments to identify meeting locations and other areas the employee may have accessed in order to identify other potentially exposed individuals and specific areas of the facility that should be cleaned.
  - The company may consider remotely interviewing the ill employee to gather relevant information about timing of symptoms, whether a test has been performed, locations in the facility they have visited and others they may have come in contact with.
- Section IV below addresses appropriate monitoring for employees who might have worked with the ill employee.
b. Make an OSHA Record/Report if Required

- OSHA’s recent guidance says such a report is required if:
  » There is a confirmed case of COVID-19;
  » It is contracted due to employee performing work-related duties; **AND,**
  » It meets other standards from OSHA reporting (for example, more than one day away from work or medical treatment beyond first aid).

c. When Can an Employee Return to Work?

- Employees should notify their supervisors when they believe they can return to work.
- An employee who tested positive for COVID-19 or who thinks they have COVID-19 and exhibited symptoms may only return to work after:
  » Three days with no fever (100.4 degrees Fahrenheit [38 degrees Celsius] or greater using an oral thermometer) without the use of fever-reducing or other symptom-altering medicines (e.g., acetaminophen, ibuprofen, cough suppressants); **AND,**
  » Symptoms have improved; **AND,**
  » **EITHER:**
    - At least ten days have passed since symptoms first appeared; **OR,**
    - The employee has two negative test results in a row, at least 24 hours apart.

d. Employees Who Tested Positive for COVID-19 but Had No Symptoms

- One hallmark of COVID-19 is that persons may not have symptoms but still are infected and could pass COVID-19 to others.
- An employee who tested positive for COVID-19 but has no symptoms may return to work:
  » After 10 days have passed since being tested; **OR,**
  » A receiving two negative test results in a row, at least 24 hours apart.
Because COVID-19 is highly transmissible, with community transmission throughout many places in the U.S., it poses particular challenges for critical infrastructure like pharmaceutical wholesale distributors when valued employees and warehouse associates are exposed to COVID-19. The CDC has issued guidance on how to best protect employees while also maintaining continuity of operations for critical infrastructure businesses. This guidance comes from the CDC’s “Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19” and “Public Health Guidance for Community-Related Exposure.”

a. When Has an Employee Potentially Been Exposed to Someone With COVID-19?

- An employee has been exposed to COVID-19 if they:
  - Had close contact (less than six feet or two meters for 15 or more minutes) WITH:
  - A person with COVID-19 who has symptoms (in the period from two days before symptom began until they meet criteria for discontinuing home isolation; can be laboratory-confirmed or a clinically compatible illness); OR,
    - A person who has tested positive for COVID-19 (laboratory confirmed) but has not had any symptoms (in the two days before the date of specimen collection until they meet criteria for discontinuing home isolation and Section III.c).
  - Short-term exposure, such as walking past someone, is not “close contact.”
  - Sharing a household is usually “close contact.”

b. What Should a Critical Infrastructure Employee, like a Warehouse Associate, Do if Potentially Exposed to COVID-19?

- While remaining in compliance with Health Insurance Portability and Accountability Act (HIPAA) requirements, the company will want to inform any employees who may have potentially been exposed to an infected employee.
- After consultation with local authorities and healthcare professionals, and depending on the circumstances of the exposure, the company may have an employee that was in close contact with the infected employee self-quarantine and stay home for up to 14 days from the time of their last exposure to the infected individual.
• The CDC has also established an interim guideline for the safety and protection of critical infrastructure workers like pharmaceutical wholesale distributor warehouse associates who may have been exposed to COVID-19 (described in Section IV.a) but are asymptomatic.
  » To be able to continue to work, a critical infrastructure worker must remain symptom-free and should be pre-screened every day before their shift begins, as described in Section I.e.
  » The protective measures discussed in Section I should be implemented, including wearing masks or face coverings and practicing six feet (two meters) social distancing.
  » If the employee has any symptoms, the steps in Section III should be followed.
CLEANING AND DISINFECTION GUIDELINES

Based on what is currently known about the virus and about similar coronaviruses that cause SARS and MERS, person-to-person spread happens most frequently among close contacts (within about six feet). This type of transmission occurs via respiratory droplets, but disease transmission via infectious aerosols is currently uncertain. Transmission of SARS-CoV-2 to persons from surfaces contaminated with the virus has not been documented. Transmission of coronavirus occurs much more commonly through respiratory droplets than through objects and surfaces, like doorknobs, countertops, keyboards, toys, etc. Current evidence suggests that SARS-CoV-2 may remain viable for hours to days on surfaces made from a variety of materials. Cleaning of visibly dirty surfaces followed by disinfection is a best practice measure for prevention of COVID-19 and other viral respiratory illnesses in community settings.

a. Routine Cleaning Procedures

- Establish a schedule for cleaning and disinfecting following CDC, FDA, EPA and other guidance. Use sanitizers and disinfectants that meet EPA’s criteria for use against SARS-CoV-2 and train cleaning staff in their proper use.
- The schedule should consider cleaning and disinfecting certain commonly used equipment and areas more frequently, including door knobs, equipment handles, machinery and scanners; and operating controls and likely touch points on forklifts and other equipment; and common use areas, such as break rooms, waiting rooms and restrooms.
- As weather, operations and security permit, consider opening truck bays to allow fresh air into the warehouse.
- Assure that ventilation systems are being properly used and maximized for circulation of fresh air.

b. Cleaning and Disinfecting After an Employee Becomes Ill

- The CDC has provided recommendations on the cleaning and disinfection of rooms or areas occupied by those with suspected or with confirmed COVID-19. That guidance provides for the following:
  » Close off areas visited by the ill persons.
  » The CDC recommends opening outside doors and windows and use ventilating fans to increase air circulation in the area and waiting 24 hours or as long as practical before beginning cleaning and disinfection.
A wholesale distribution facility, however, may not be able to open doors and windows in this manner due to the potential security risks. To the extent possible and practical, the area where the employee worked should be cordoned off until it can be thoroughly cleaned and disinfected.

Cleaning staff should clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls and machines used by the ill person, focusing especially on frequently touched surfaces. Cleaning staff should wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash.

The CDC provides recommendations for cleaning hard, non-porous surfaces, soft, porous surfaces, electronics, linens, and clothing. EPA-registered disinfectants should be used.

- There is a list of [EPA-registered “disinfectant” products for COVID-19 – Disinfectants for USE Against SARS-CoV-2](https://www.epa.gov/disinfectants/disinfectants-use-against-sars-cov-2) that have qualified under EPA’s emerging viral pathogen program for use against SARS-CoV-2, the coronavirus that causes COVID-19.

Special attention should be paid to high-contact surfaces, such as: doorknobs, touch screens, control panels, time clocks, tabletops, breakroom/cafeteria facilities, handrails, handwashing stations and restroom facilities.

- Because transmission occurs from person to person, a facility does not necessarily need to be shut down as a result of an employee, visitor or other individual testing positive for COVID-19 if the steps above are followed.
- It is understood that the majority of warehouses will be hiring an outside, professional cleaning company to provide the cleaning if an employee or visitor has tested positive and been in the facility. If so, the vendor contract should be compared to the CDC recommendations to ensure the cleaning vendor has covered, at minimum, the CDC recommendations as well as ensuring any other local or municipalities’ guidelines are also being addressed.
REFERENCES AND SOURCES:

- OSHA COVID-19 Control and Prevention.
- FDA Best Practices for Re-Opening Retail Food Establishments During the COVID-19 Pandemic (June 1, 2020).
- CDC Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes.
- CDC Guidance for Cleaning and Disinfecting.
- CDC Cleaning and Disinfecting Your Facility – Everyday Steps, Steps When Someone is Sick, and Considerations for Employers.
- CDC COVID-19 Symptoms.

Some of this information is based upon “Food Industry Recommended Protocols When Employee/Customer Tests Positive for COVID-19” “As of March 27, 2020 (Version 3).” We wish to thank the organizations responsible for that document.