



Re-opening Confer Plastics: How and why we did it ***Some advice to help you address Covid-19***

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How we got here

In early-2020 we were all over Covid-19 at Confer Plastics.

By late-January we were telling our coworkers to be aware of the 401(k) plans. By mid-February we had instituted 14-day quarantines on any employees who travelled or would be traveling internationally. We were also banning visits from any customers or vendors who did the same.

By the first week of March we stopped the use of our hand scanners and began major cleanings of common areas three times a shift. By the second week of March we scheduled a two-week shutdown to begin at the end of March in anticipation of the state going into a shutdown.

Despite all that early awareness and preparedness – *and culture-building around Covid-19* -- we weren't ready for what would come.

No one was.

The State went into a long-lasting mass shutdown of the economy. That lasted 6 weeks for our company, many more weeks for others. At the time of this writing, most of the economy, except essential, was still shutdown with literally hundreds of thousands of New Yorkers unemployed.

We at CPI came out of that shutdown on May 4th with only 36 of 165 people being able to work at the plant as we focused on essential products – defense, healthcare, medical, construction and spas. They were pre-existing product lines for Confer, but we were not producing them during the shutdown for two reasons: One, to make sure our coworkers were home and safe as the virus peaked in the Empire State and, two, to allow the orders to come in and the inventory to dwindle, justifying production.

We've committed ourselves to knowing that the largest portion of our business – swimming pool products (our bread and butter) -- will be allowed to open when the rest of the Western New York economy does.

Could it be June 1st?

I don't know.

No one knows for sure.

But, we're ready and we have been ready. The prolonged downtime gave us plenty of time to develop strategies and responsibilities – at the corporate and individual levels – to make sure our workplace is Covid-19 free.

Our worldview is simple, and it should be one that you follow in your workplace:

This is all being done because there are a whole bunch of deserving people...

Our coworkers deserve a healthy place to work.

Our clients deserve a healthy place to do business.

Our vendors and contractors deserve a healthy place to do their job.

Our customers deserve a healthy supply chain.

A little precaution goes a long way in making sure our economy and our society are healthy.

The purpose of this booklet

To some people, the Covid-19 virus is scary.

To some people, the Covid-19 economy is scary.

I'd like to help the community lessen those fears.

Being that we've been focused on the virus for so long at Confer Plastics I thought that I should share some of our observations and action plans so you have a foundation from which to base your re-opening, or some ideas in which to improve yours.

I don't mind sharing what we've done because I look at it this way: Confer Plastics is part of the community...and vice versa. I want to see every business, every working family, pursue and achieve their American Dream. I'm hopeful that what I share here helps in that regard.

Please know, though, that these are suggestions and not the Gospel with health measures. Not everything we do applies to every workforce and not everything is guaranteed to work nor is it proven to work. With any measures you institute in your workplace, always refer to your management team, ownership, health officials and legal for appropriate creation, auditing and enforcement of your Covid-19 protocols.

Who takes the lead role?

As an employer you have to approach the coronavirus crisis with this understanding:

For the next 12 to 18 months employers must understand that some of your workers WILL get Covid-19. You cannot control what they do outside of work. But, you can control/mitigate/prevent its spread in your workplace.

The onus is on everyone in the workplace to be involved.

Ownership has to be deeply involved -- as the owner of the company this has been an incredible portion of my workday for months and it will be for many more. It has to be.

All managers have to invest time in it. Everyone on the team has to police and audit and work by the rules.

Beyond that, I think that when any employer hits a threshold of their determination – 50 employees? 100? 150? – they should consider dedicating someone full-time to Covid-19, just as a company might do for other factors related to health, safety, and law – like HR, safety, compliance, ISO-9000, etc.

So, what I did is I re-assigned a bright young man who previously ran two of our distribution centers.

Nick Kocur was designated as our Covid-19 Administrator. For the next 6, 12, 18 months – however long it takes the world to tackle Covid-19 – this will be his full-time and only job at Confer Plastics.

My team and I will work with him to make protocols and procedures; he'll implement, refine and audit them; he'll manage PPE inventories; he'll create networks for testing, cleaning etc.; and he'll maintain a massive paper trail for tracing, reliability studies and liability issues.

Many employers might look at this as unnecessary overhead cost. But, what price do you put on the health and safety of your team...especially for a virus that could haunt us in waves for a few years?

Invest in people to get it done. They are your best and most important assets.

What to do when the day begins: health screening

For many years now we've had a contagious illness policy at the plant that demands our coworkers not come to work ill and, if they did, they would be sent home. We never wanted the domino effect caused by others getting sick. If you did not have such a policy in place, now is the "best" time ever to institute it and add it to your handbook.

In the event someone does break that rule, we're ready to get them on the way in to work. Every day during the crisis we will be doing health screens of all employees (and visitors) when the shift begins (or the visitors arrive).

To ensure people don't enter the building ill, we have a screening tent set up in our parking lot with heat and lights. The shift supervisor conducts these exams. Only one person is allowed in the tent at a time with the supervisor to ensure there are no HIPAA violations.

At the start of a shift, the foreman will use a no-touch thermometer to check temperature – and also again at the start of one’s lunchbreak. Those with temps 100.4 Fahrenheit (38 degrees Celsius) and above will be sent home and will be asked to remain home until they have been fever-free for at least 72 hours without any fever reducing medication. In the event that an employee shows COVID-related symptoms prior to the screening, during the screening or while at home in recovery, he/she will be sent/kept home and will not be permitted to return without clearance from his/her physician.

During that temperature check, they are also asked simple questions about how one feels and if they’ve been exposed to any known sick people. The questions we use are:

1. Have you been diagnosed with Covid-19 within the past 14 days?
2. Are you experiencing -- or have you been experiencing within the past week -- any symptoms that could be associated with Covid-19, such as
 - * Shortness of breath
 - * Fever
 - * Unusual tiredness
 - * A cough that is not a chronic cough attributed to a pre-existing condition
3. Within the past week have you been exposed to someone who was under quarantine and/or is diagnosed with Covid-19 or has shown symptoms of Covid-19?

Employers must understand that it will take some time to do the screens. They are brief by themselves, but with you potentially getting back to dozens of people a shift later this year they add up. In our case, we holding tests from 6:20 AM until 7:00 AM (1st shift starts at 7:00 AM); 2:20 PM until 3:00 PM (2nd shift starts at 3:00 PM); and 10:20 PM until 11:00 PM (3rd shift starts at 11:00 PM). When our coworkers line up to be tested (not when they arrive on site, or when the foreman tests them), we tell them to keep track of that time and let the foreman know what that time was when he screens them. Since screening is a requirement of that day’s employment, they will be paid from the time that they went into the testing line. Yes, that adds overtime costs when you may not want them in a bad economy, but it’s a necessity given the importance of testing.

Important: Your coworkers must be informed – *and sign-off on acknowledgment* -- prior to the re-start that it is not the intent of this screening to obtain any health information regarding underlying conditions or medical issues that they may have. It is simply intended to confirm whether they are experiencing any COVID-related symptoms at that time or whether they have been exposed to any individuals known or potentially positive COVID tests or symptoms. If they do not feel comfortable answering these questions with the foreman, they may contact HR to review their responses. Decisions regarding work assignments as a result of these answers will be determined on a case by case basis.

Testing and follow-up

If the criteria shown can lead one to believe that someone may have Covid-19, they will be sent for a test at any number of testing sites in Niagara County.

Where we are located we are blessed with 5 sites within a 15-minute drive of our factory: The State's testing center at NCCC (for active tests), two WellNow facilities (for active and antibody tests), Quest (for antibody tests) and Rite-Aid (for active tests). I encourage you to make calls in your community to various testing facilities to understand their capabilities.

The test will be paid for by the company and HR and/or our Covid-19 Administrator will provide the appropriate contact and scheduling information. On receipt of the test results, our coworkers are encouraged to share them with HR and/or our Covid-19 Administrator so we can plan their return to work and address any potential exposures in the workplace.

Under HIPAA you cannot demand those results – *even under this crisis* – so it is encouraged that you have employees sign off on a form, at restart, indicating they will share test results due to workplace safety concerns. Consult your legal team on how to craft the letter.

When it comes time to explain to your coworkers that they were exposed to Covid-19 – hopefully that never happens – you cannot by HIPAA and ADA law tell them WHO the exposure came from. You can only tell them they were exposed.

Quarantining sick and/or exposed employees

In the event that an employee or someone within that employee's household has tested positive for Coronavirus, they must self-quarantine for at least 14 calendar days. 10 working days of this absence will be covered with special paid Covid-19 leave as defined by state and federal standards.

They cannot return to work until the quarantine is completed AND a Covid-19 test taken within the last 2 days of that quarantine shows that they are negative for the active virus. If they test positive in the last days of the quarantine, said quarantine will be extended in 14 calendar day increments until tests show that they are no longer positive.

That quarantine is also extended if others in their household test positive – but you don't – in the last days of the quarantine.

If someone in an employee's household shows Covid-19 symptoms and does not have access to healthcare, the company will pay for a test for that individual as a means to verify if our coworker or our team are at risk.

Masks

At start of our team's return to work, everyone is issued 6 re-usable masks. All employees are expected to wear these masks at all times in the building (except when eating and drinking).

Our office space has different rules since most offices are not shared space and our team are communicating on phones. If someone is alone within their office, a mask is not required. Once someone enters their office both parties must wear masks. If someone leaves their personal office and enters office common space, they must wear a mask.

Be sure to share this message with your team if you mandate masks: *If you have an issue that prevents you from wearing an issued mask, you will need to contact HR to discuss an alternative facial covering.*

We tell our team that our re-usable masks should last at least two months. To care for them, hand wash and allow to dry for 24 hours. If they need more masks they see their supervisor.

If you are wondering how to get masks, please reach out to our Covid-19 Administrator Nick whose contact info is at the close of this document. He can direct you to some local and national sources.

Please note: You should be buying PPE (and cleaning supplies) NOW, well before you open up. The lead times – and inventories – are not the best through almost all vendors. The supply chain is at – even beyond – its limits.

We also started using a new acronym to describe masks. They are more than PPE (Personal Protective Equipment)...they are IPPE (InterPersonal Protective Equipment) as they protect the user *and* others.

Social distancing

We follow and enforce the federal and state social distancing guidelines of 6 feet. We ask that employees maintain 6 feet of space between themselves and other employees, except in the case of an emergency or where the necessary work requirements prevent such spacing (there are a few tasks at the plant that fall into that category).

Workstations have been reconfigured to spread operators and will be every time we change over production lines. Foremen will ensure social distancing of operators. If you operate a factory or fabricator, you should be investing in worktables now, expanding your supply dramatically.

Understand this: You will likely find that social distancing is the hardest habit to break. Getting people to wear masks is easy. Even though your employees were locked up for weeks, they stayed home with the same people and didn't practice distancing in their household. So, as they see their friends at work or want to communicate with coworkers you will find them creeping into the 6' space out of habit. Constant correction by management and coworkers is a must. For many people – especially the extroverts and outgoing – this will be a tough behavior to change. But, you have to be the bad guy.

Breaks and common areas

We have done a lot to control the use – our overuse – of common areas like the cafeteria, time clock station, communication boards, and restrooms. In a work environment like ours the greatest chance for exposure would not come from the work area, it comes from where people are when they are NOT working.

We've told our team that the lunchroom is for cooking not congregating. No more than 4 people are allowed in there at one time (unless those above that number are only in there to cook or to get products from the vending machines). We've also eliminated all but one chair per table to help ensure this.

So, how do we overcome the decline in dining space?

Drivers are encouraged to enjoy breaks within their cars. Walkers, bicyclists and those who are dropped off can take a break in the lunchroom; however, if there are already the maximum number of people in the lunchroom, they will need to find an alternative location or wait until the space clears out.

We've added more picnic tables outdoors for dining. We indicate no more than 2 people per table and they must be six feet apart. We will be, in coming weeks, developing more dining space indoors, specifically folding tables in the warehouse.

To prevent use of our fridges and freezers and the passing of Covid-19 we have unplugged them and told our team they must use their own coolers.

We do maintain the microwaves and toaster ovens but we are encouraging our team to bring hot meals in a Thermos type container to inhibit frequent microwave use. To give them the tools to succeed in that regard, we will be providing every employee an insulated food container.

We have a smoking hut as a designated smoking area. Only 1 smoker at a time so social distancing rules are followed. This rule is "a must" as many smokers are social smokers.

A bank of portable bathrooms has been added outdoors to add more of this necessary common space.

Recording time

Break areas are also where people meet to check-in or out for the day.

That act, a Human Resources necessity, can no longer be the case in ways that it was done before.

Think about your workplace and how people were lined up at the end of the day. You can't do that with social distancing.

Nor can you allow your employees to run their hands in a communal hand scanner...or fumble for time cards on a rack.

Prior to the shutdown, we stopped using the hand scanner because of Covid risk. So, we began manual recording of hours by the supervisor who then submits his report to HR who must then enter manually all those hours when, for years, it was something done so quickly and easily by time cards and hand scanners.

But, it's worth all that extra work to mitigate risk.

We are currently looking into alternatives -- no-touch methods including facial recognition systems.

Cleanliness

Our common areas -- lunchroom, bathrooms, washrooms, offices -- are diligently cleaned three times a shift, sprayed and wiped down. This includes not only tables, but knobs, handles, buttons etc. -- anything people touch.

Also, Lysol bottles and towels are provided in the lunchroom where employees are encouraged to clean their dining location before and after use.

We encourage employees to regularly wash their hands before, during and after breaks. We have posted reminder signs in the plant related to proper handwashing and other ways to avoid the spread of COVID. Also, all employees will be issued their own stash of hand sanitizer.

If someone becomes ill with coronavirus symptoms during the workweek – and the test proves positive - the workplace will be shut down for a minimum of 24 hours so that disinfecting of the plant can be completed by our team and an outside contractor. There are a variety of cleaning companies in WNY that can handle such a task, including Servpro of Niagara County (716.299.0330) and ProClean (716.313.2020).

Access to the workplace

To prevent unknown and unscreened people from entering the workplace, we lock our office door and have posted notices for cold call salesmen to call ahead for approval and screening.

No truck drivers may enter our facility due to their exposure to multiple, cross-country, cross-border workplaces, so all paperwork and communication is handled outside when doing shipping and receiving.

Pre-approved visitors – existing sales networks and outside contractors – are scheduled and they, like our employees, receive temperature checks and health screenings. We maintain a visitors log to track exposures.

Personal equipment

If your coworkers typically took backpacks, bags and coats to a workstation shared with others, don't allow them to do so in the event those items carry the virus from home or public transit. Encourage those items to be kept in cars or in a locker.

Build an inventory

It is absolutely critical that you build now – *before re-opening* – an inventory of PPE, testing and cleaning supplies. Then, maintain that with minimums to trigger reordering. The lead time on many is too great and getting access to them is sometimes impossible. You can't have enough, soon enough. So, invest upfront.

Build a network

As mentioned with health screening, you want to build a network. Create a deep and diverse well of connections for testing, PPE, and cleaning.

Also, reach out to your workers compensation carrier, liability insurance carrier, local Department of Health, lawyer and others to indicate what you are doing.

Communication

Communication with employees is, as always, absolutely critical.

BEFORE they return make sure they receive a letter about your new rules, regulations, and expectations. Provide them two copies – one to keep, one to bring signed upon their return.

Install signage throughout your facility addressing the importance of PPE, hand cleaning, and social distancing.

Regularly issue newsletters and updates.

If you regularly posted communications pieces on corkboards, don't. People will congregate. Instead, issue those documents to each workstation.

We have also added a color coding system throughout the plant. It is used to identify the risk level of commonly used surfaces. Red labels equal high risk, orange is medium risk. We suggest caution and awareness should be used when coming in contact with these surfaces. Using that system, we encourage employees to frequently wash/disinfect hands when coming in contact with any commonly touched surface/tools and that best judgement should be used when determining risk levels of surfaces that are not color coded. We also tell all that is VERY important to note that ALL door knobs, handles and buttons are HIGH RISK even if there isn't a sticker on that surface.

Return to work gradually

Economic conditions permitting, your company might have the need to start back in full immediately once your region is given the green light. Even though we have an immediate need for our pool products once the OK is given, we will not go right back into full employment. We're taking baby steps and adding people gradually over the course of weeks.

I encourage you to do the same if your workforce is big enough.

What's "big enough?" Your personal threshold might be 10. It could be 100. It's at your discretion, your consideration.

The reason why we are coming back slowly (20 to 30 people or so every 2 weeks once "non-essential" is allowed) is to build on the Covid-19 culture and verify its effectiveness. We want to make sure returnees are playing by the rules, that they understand them and that the rules are working to ensure safety. It's easier to manage and gauge the newly-minted behaviors of a few at a time and adjust their behaviors accordingly than it is to flood the workforce and try to find the bad apples...while hoping they didn't infect anyone.

It should be noted though that this might not work for all employers when it comes to the Payroll Protection Program and whether you'd be looking at a loan or a grant (forgiven loan) through the PPP. You might have to bring back everyone sooner in order to meet the guidelines necessary for loan forgiveness. Consult your lending institution and accountant before making any decision.

Paid sick leave

Both the State and Federal government have Paid Sick Leave regulations in effect specifically for Covid-19. Have your HR team research those and then educate your workforce of these mandated benefits. The federal program is found in the Families First Coronavirus Response Act (FFCRA).

As we head into 2021, New York has also introduced a general paid sick leave law. Research that and be prepared to institute it at that time.

Start planning for flu season

We've heard often enough that the second wave – potentially coming this fall or winter – will be tough because it comes the same time as flu season.

This brings on special considerations. Covid-19 and the flu can present with similar symptoms. But, they have entirely different impact and quarantining procedures. You can't shut down your operations every time symptoms appear in the fall and winter, because you never would have done that before with the flu which is what many of the sick people may be experiencing.

My suggestions:

Earlier in this document, I mentioned how powerful a tool a contagious illness policy can be. Make it. Use it.

Keep start-of-day and visitor screening going all year – and beyond.

I mentioned the importance of developing a testing network. You want to get people tested immediately with timely results so you can determine if it was Covid-19 or the flu. Make your testing network sustainable and useful for the future – not just the present.

Utilize flu shots. If you get people vaccinated against the flu this fall, you lessen – but don't necessarily prevent – their ability to contract influenza. That helps you mitigate sickness overall in the workplace while helping to cut back on Covid/flu confusion. I wouldn't mandate flu shots, but I would strongly encourage them, something no different than what we've been doing for years now at the plant.

To get more people to get flu shots, make it easy on them. Every year we have Rite-Aid come to the plant to administer shots onsite. Easy. Painless. No one has to go to the pharmacy or a doctor. These shots are covered by our HMO, but if someone has chosen to be uninsured or is a temporary employee, we pay for the shot (last year's price was \$30).

Audit and enforcement

Keeping an eye on employees is critical. Their health matters. Your ability to stay open matters.

In our workforce, the foremen and management will be observing and enforcing the behaviors of workers. The Covid-19 Administrator will also be watching the previous day's video footage of all 3 shifts to ensure compliance and he will be making regular stops on "off-shifts".

Discipline of these rules should follow your standard, tiered discipline system. But, treat this as a life-or-death matter, too -- if some rules are met with aggression or purposeful non-compliance, suspension or termination should be immediate.

You and your employees must also recognize that this situation is unprecedented and it still changes on a day to day basis. As such, tell your employees the company reserves the right to amend, add to or eliminate any of the provisions previously shared (but, you must notify you if any such changes are made).

Do it now

If you are not open yet, plan your re-opening now.

Make the rules while everyone is off site. You don't want to make the rules and change the areas while everyone is there. BE READY FOR YOUR TEAM. BE READY TO KEEP THEM HEALTHY. Take advantage of the downtime to change your workplace and your culture.

Now is your chance to implement and be successful. Doing it on the fly would be dangerous and likely destined for failure, especially if you have a sizable workforce.

Resources

This document is just a sampling of ideas and actions. It doesn't work for all businesses and workplaces.

To acquire more templates, models and plans, do the following:

Visit your trade industry websites.

Contact your County officials. Here in Niagara County, officials are amassing a variety of resources at:

<https://www.niagaracountybusiness.com/business-reopening-guidelines>

Fellow manufacturers in my region should reach out to Peter Coleman at the Buffalo Niagara Manufacturing Alliance or visit the BNMA's website at:

<https://www.bnmalliance.com/>

New York State has also provided guidance to manufacturers:

<https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/ManufacturingMasterGuidance.pdf?fbclid=IwAR0iCzALJqa3lksi0HXsojrdYr2b4OY33JtIHCIHngk8dRXJa5bRvzHgiVg>

Affirming your plan

After you have been given the approval to start-up – whether for essential purposes or as part of the Phased Start-up – you have to affirm your plan with New York State:

<https://forms.ny.gov/s3/ny-forward-affirmation>

Contacting us

This is just a starter on what we've done and what we will be doing. We'll be changing, adding and removing controls for the foreseeable future. This really is the "new norm".

If you'd like some more ideas, please feel free to contact us. Sure, we've got our own business to run and own Covid protocols to manage, but we always have time for our fellow entrepreneurs and employers – we want to help you succeed in bringing about a healthy community and a healthy economy. We all win when we work together.

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