



## Ed Kissam Comments re COVID-19 Safety in the Agricultural Workplace for ALRB Hearing on 8-11-20

### 1. SCREENING FOR WORKPLACE SAFETY

Has the Western Growers' Association or the California Farm Bureau advised its members of the limitations of temperature-screening as a way to assure that agricultural workplaces are free of COVID-19+ workers? CDC estimates that about 40% of COVID-19 infected individuals are entirely asymptomatic. Others are highly infectious and pre-symptomatic for about 2-3 days before experiencing any symptoms of COVID-19. The current measures are useful but do not, by any means, guarantee workplace safety. Appropriate measures to respond to the very serious limitations of current screening practice would be:

- a) to advise workers and operations supervisors of the well-understood limitations of temperature-checking as a screening approach
- b) to provide training to workers on factors that constitute a "close contact" and query workers on arrival if they have been a close contact of someone known or presumed to have COVID-19,
- c) to institute repeated rapid-turnaround antigen testing of the workforce—ideally 2 times per week and mandatory for all workers (including supervisors and management)

(Citations available from Ed Kissam at [edkissam@me.com](mailto:edkissam@me.com) on request).

### 2. ADOPT ONGOING REPETITIVE SCREENING OF AGRICULTURAL WORKFORCE USING COVID-19

**ANTIGEN TESTING** Additional screening is essential—due to the clear-cut limitations of current observational screening methodologies (temperature-checking, observing illness). Leading experts are now highlighting the advantages of antigen testing for schools and businesses. These arguments hold for adoption of antigen testing by agricultural employers—since farmworkers are in a high-risk category for SARS-CoV-2 infection due to a combination of inconsistent social distancing because it's difficult and crowded housing that leads to very high proportions of within-household infection.

Antigen tests cost about \$1-2 each for test materials and the point-of-care equipment is affordable for employers. Results are available in 15 minutes. Twice-a-week testing, say on Monday morning and on Friday afternoon, would cost less than \$5/week per worker. What models for cost-sharing seem promising? For example, public sector (state or county) covering cost of the point-of-care test device and employers cover cost of testing personnel and supplies? Or vice-versa?

See the following article from Science (American Association for Advancement of Science):



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[https://www.sciencemag.org/news/2020/08/radical-shift-testing-strategy-needed-reopen-schools-and-businesses-researchers-say?utm\\_campaign=news\\_daily\\_2020-08-04&et rid=558825031&et cid=3434962](https://www.sciencemag.org/news/2020/08/radical-shift-testing-strategy-needed-reopen-schools-and-businesses-researchers-say?utm_campaign=news_daily_2020-08-04&et rid=558825031&et cid=3434962)

Rapidly-growing support for antigen testing may improve supplies and decrease cost per test for antigen testing very soon. Seven states have already written to the federal government about availability.

**3. OFFER EMPLOYER REIMBURSEMENT TO EMPLOYEES FOR COSTS OF WHOLE-HOUSEHOLD PCR TESTING FOR WORKERS WHO ARE IDENTIFIED AS COVID-19+ OR WHO ARE IN A HOUSEHOLD WITH A COVID-19+ PERSON.**

Within-household COVID19 transmission in crowded farmworker housing is very high. Using National Agricultural Worker Survey data, I have estimated that within-household transmission of SARS-CoV-2 is likely to be 2.5 times higher than in the average U.S. household. Testing everyone in a farmworker household (where everyone can be presumed to be a “close contact” is judicious and will have particular benefits for workplace safety if the household member who is COVID-19+ is the child or spouse of an employee.

COVID-19 transmission is a 2-way street. Farmworkers infected in the workplace are very likely to infect most of their family members. And, vice-versa, a farmworker infected by a family member or friend, is likely to introduce SARS-CoV-2 into the workplace—in many cases before they even have symptoms that suggest they may have COVID-19.

**4. OFFER FINANCIAL INCENTIVES FOR SELF-ISOLATION OR QUARANTINE AS APPROPRIATE.**

Due to inadequate financial support for farmworkers who are asked to self-isolate or self-quarantine due to being COVID-19+ or being a contact of someone who is COVID-19+, a number of farmworkers (especially the asymptomatic contacts of COVID-19+ individuals—family members or co-workers) are reluctant to comply with medical/public health recommendations and, therefore, are likely to go on to infect others. San Francisco County and Alameda County are currently offering financial incentives. I have collaborated with a colleague, Dr. Dvera Saxton at CSU-Fresno, in recommending a “Quarantine Fund” for Fresno County. The costs of financial incentives to encourage quarantine or self-isolation are significant, but much lower than loss of an entire workforce for 2 weeks due to rampant infection at a worksite. One option might be public-private sector cost-sharing—have there been discussions about such an approach to cost sharing?

**5. ESTABLISH AN AGRICULTURAL INDUSTRY COLLABORATIVE PROJECT TO SHARE “BEST PRACTICES” FOR COVID-19 WORKPLACE SAFETY AND REVIEW RAPIDLY-EMERGING INSIGHTS FROM EPIDEMIOLOGICAL RESEARCH AND CLINICAL LITERATURE.**

I have critiqued CDC’s slow, bureaucratic, and scientifically-flawed guidance to agricultural employers (which failed to incorporate insights from its own teams of researchers and data analysts).



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There are similar problems with “trickle-down” copies of generic, vague guidance based on the CDC/OSHA framework. CAL-OSHA, and CDFA have lagged well behind “the field” in learning about and disseminating new insights regarding SARS-CoV-2 transmission, assessing the implications for effective workplace strategy, and promoting still more refined practices for improving workplace safety.

My July, 2020, paper identifying the shortcomings of CDC guidance are available at the WKF Fund website: <http://www.wkfamilyfund.org> We believe that collaborative peer learning will be helpful. It is good to learn from CIRS’ COFS preliminary findings that some employers are working thoughtfully on practical strategies. Some informal information-sharing is surely underway but this should get more support.

#### **6. ENCOURAGE PROACTIVE EMPLOYER CONTACT-TRACING EFFORTS TO IDENTIFY CLOSE CONTACTS OF COVID-19+ WORKERS.**

Waiting for county public health departments to identify the “close contacts” of a COVID-19+ worker at a worksite is futile at this point in time and in the foreseeable future. Agricultural employers should be encouraged to engage in rapid contact-tracing when one of their workers is determined to have COVID-19 or even if they are presumed to be COVID-19+ (based on consultation with a health care provider even before receiving a COVID-19 test result confirmation).

Expert opinion (based on epidemiological modeling) stresses the crucial importance of decreasing time from infection to isolation. Delays in contact-tracing seriously degrade its utility as a tool to mitigate spread of COVID-19. Concerns about barriers to securing COVID-19 testing delays in turnaround time for COVID-19 test results have been widely publicized but there has not yet been enough attention to the delays in case investigation and contact-tracing that are needed to identify contacts and persuade them to quarantine themselves.

Current California Department of Public Health Guidance includes two important and practical recommendations to all employers:

- Develop mechanisms for tracking suspected and confirmed cases among employees.
- Employers should notify all employees who were potentially exposed to the individuals with COVID-19.

This advice is very forward-thinking and improves on previous guidance which was to wait for local health departments (LHDs) to initiate case investigation and contact tracing. It is obvious that county public health departments currently cannot do contact-tracing effectively in most agricultural counties. Fresno County, for example, reported more than 3,800 COVID-19 cases among the working age population 18-64 years of under investigation as of July 17. The backlog is surely worse now.

Although California Department of Public Health guidance to employers on communication with local public health departments focuses only on reporting to public health authorities, the primary strategic objective should, in fact, be to identify close contacts of infected workers as rapidly as possible and get



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them to self-quarantine successfully. (See National Institutes of Health/Fogarty Center discussions re contract-tracing metrics on July 27, 2020).

To do this, there is an urgent need to strongly encourage rapid employer-initiated contact-tracing to identify co-workers who were potentially exposed--not to suppress information about infections in the workplace as some employers have tried to do (with disastrous consequences for their workforce and for their own businesses)!

Encouragement to be proactive will only be useful if practical guidance is provided to all agricultural employers will be required to provide employers the ability to do this. Arguably, the basic contact-tracing course now widely available could be supplemented with guidance tailored specifically to the distinctive conditions in different types of tasks and production/processing environments.

This is not at all impractical. Johns Hopkins University provides a free, online 20-hour course in contact tracing that is available. The University of California San Francisco (UCSF) has also been providing training in contact-tracing but the state has been remarkably short-sighted in limiting enrollment to public sector employees. It is irresponsible of the State of California to not immediately extend training of contact-tracers to community-based organizations and to employers who commit to be proactive in conducting their own contact-tracing. It would be judicious, if as is being done by current contact-tracing course providers, training were to incorporate the most recent insights about COVID-19 transmission (e.g. new insights about aerosol transmission).

If employers take the initiative to initiate their own contact-tracing they can reasonably identify all workers at a worksite where there is a COVID-19+ individual who have been significantly exposed—taking into account specific tasks and types of interaction among workers. This proactive approach is needed to meaningfully identify the workers at a worksite where an initial case of COVID-19 has been identified who have been “potentially exposed” as per the CDPH guidance.

In contrast to employer efforts to suppress all information about COVID-19 infection in the workplace, the proactive approach recommended here would provide an empirical basis for actually determining not only co-workers who have been potentially exposed while, at the same time, identifying some who are unlikely to have been exposed. In terms of rational employer risk-management, investment in rapid case investigation and contact-tracing for each case of COVID-19 identified in the workforce is not only a better strategy to achieve public health objectives but, also, in terms of likely economic outcomes.