

Sample Plan for COVID-19 Exposure Prevention, Preparedness and Response

Scope

The following procedure was developed to ensure the safety of all (**Company's Name**) employees and contractors in relation to the Novel Coronavirus (COVID-19) and its potential exposure while working on construction sites and performing related activities.

Background Information

In January 2020 the World Health Organization (WHO) declared the outbreak of a new coronavirus disease in Hubei Province, China to be a Public Health Emergency of international Concern. WHO stated there is a high risk of the 2019 coronavirus disease (COVID-19) spreading to other countries around the world. WHO and public health authorities around the world are taking action to contain the COVID-19 outbreak. However, long term success cannot be taken for granted. All sections of our society – including businesses and employers – must play a role if we are to stop the spread of this disease.

The following procedure was developed in accordance with guidance and recommendations set forth by national, federal, county, and state agencies. They include:

- Centers for Disease Control & Prevention
- New York State Department of Health
- New York State Governor's Office
- Occupational Safety & Health Administration (OSHA)

Responsibilities

Management

All managers and supervisors shall be trained on this industry specific COVID-19 Prevention, Preparedness and Response plan and must be ready to continually educate employees. It is paramount that managers and supervisors set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the continued spread of the virus. General social distancing guidelines should be a continuous focus of the education of its employees, including details such as discouraging hand-shaking and other contact greetings. Managers and supervisors must encourage this same behavior from all employees. Specifically, the role of project managers and supervisors include:

- Designating a COVID-19 Safety Resource Officer (CSRO) to monitor and implement all recommended safety practices regarding the COVID-19 virus with all contractor staff members to monitor and implement all recommended safety practices regarding the COVID-19 virus with all contractor staff members. Supervisors must have the authority, through consultation with the CSRO, to halt all activities that do not adhere to the COVID-19 safety practices. The CSRO should have training

commensurate with this hazard and all required industrial hygiene practices that may be required on the job site. This person will be responsible to maintain supplies of disinfectants and make sure that workers follow decontamination, hand washing, and distancing.

- Staggering breaks, lunch, and general staffing to maintain proper distancing, both in the trailer and out on site.
- Monitoring the adherence to safety protocols for all individuals on site
- Mitigating risks and hazards quickly to keep the site in compliance throughout the work day
- Managing the flow of traffic on and off the site and verify that all who enter can meet the health standards that will be clearly posted at the entrance to the site.

Responsibilities of Employees

The Company is requiring every one of our employees to help with our prevention efforts while at work. All employees must strictly follow these new rules. In addition, employees are expected to report to their managers or supervisors, preferably via telephone if and when possible, if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please do not hesitate to ask your manager or supervisor.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

Coughing, fever, shortness of breath, difficulty breathing, early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea, vomiting or runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK** and call your supervisor and healthcare provider right away.

Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

Job Site Protective Measures

The Company has instituted the following protective measures at all jobsites.

General Safety Policies and Rules

- Any employee/contractor/visitor/supplier showing symptoms of COVID-19 will be asked to leave the jobsite immediately. (Checklist is attached as Appendix A)
- Post Social distancing markers using tape or signs that denote 6 ft of spacing in commonly used and other applicable areas on the site. (ie: clock in stations, health screening stations)
- Limit in-person meetings or hold them outside whenever possible, or in ventilated spaces, ensuring all employees are a minimum of 6 feet apart from one another, or use tele- or -video conferencing. Attendance at these meetings will be collected verbally and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through shared sign-in sheets or mobile devices and no signatures whether virtual or actual will be required. Site Safety Resource (CSRO) manager will follow CDC Social Distancing Guidelines.
- Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors/suppliers) to maintain personal space of at least six (6) feet at all times unless safety of the core activity requires a shorter distance. Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers. All project owner/engineer or other meetings shall be conducted via online communications or via telephone.
- There shall be no traveling of office management to the jobsites unless absolutely necessary. Meetings and/or weekly/monthly inspection shall be conducted using an online virtual meeting platforms with the superintendent on-site.
- There shall be no travel between offices for those stationed at the home office. Use online virtual meeting platforms.

- Employees will be encouraged to continue the maintenance of the 6 feet rule and maximum gathering guidelines of 10 persons during staggered breaks and/or lunches. Employees will also be encouraged to bring lunches and any other personal needs with them to work, mitigating the need for them to leave the jobsite during the work shift.
- The Company understands that due to the nature of our work, access to running water and soap for hand washing may be impracticable. In these situations, the Company may provide alternatives, such as alcohol-based hand sanitizers and/or wipes. Where practicable and when available, jobsite may be equipped with temporary wash stations as supplied by local vendors or they may purchase and deploy company owned stations so long as they are maintained according to OSHA and other applicable standards.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, the Company will provide alcohol-based wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Employees are encouraged to limit the need for N95 respirator use, by using engineering and work practice controls to minimize exposure. The use of cloth type facial coverings will be deployed to ensure the safety of the employees.
- When practical and where projects are of larger size, as part of the division of crews/staff, the Company may elect to divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the remainder of the project. If there is a legitimate reason for an employee to change shifts, the Company will have sole discretion in making that alteration.
- Employees are encouraged to minimize ride-sharing. If necessary to have more than one person in a vehicle at the same time, all occupants must wear face masks. At no time will vehicle/tightly confined spaces be occupied by more than 50% maximum occupancy. When traveling across state borders, employees will follow recommended CDC protocols.
- If practicable, each employee should use/drive the same truck or piece of equipment every shift. If this is not practical, then the equipment

and/or vehicle shall be thoroughly sanitized by the operator/driver at the completion of their shift in preparation for the next operator/driver.

- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.
- Establish designated areas for pick-ups and deliveries, limiting contact to the extent possible.

Workers entering Occupied Building and Homes

- Construction and maintenance activities within occupied homes, office buildings, and other establishments, present unique hazards with regards to COVID-19 exposures. Everyone working within such establishments should evaluate the specific hazards when determining best practices related to COVID-19.
- During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The Company will provide alcohol-based wipes for this purpose.
- Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum and shall not occupy interior working zones with a rate greater than 1 employee per 250 square feet. Workers should wash or sanitize hands immediately before starting and after completing the work.

Job Site Visitors

- Visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.

Personal Protective Equipment and Work Practice Controls

- Employers must provide employees with acceptable face covering at no-cost to the employee and have an adequate supply of coverings in case of replacement.
- Face coverings must be cleaned or replaced after use or when damaged or soiled and can not be shared.
- Employees shall ensure standard disposable PPE is disposed of properly and any and all reusable PPE is properly sanitized prior to transferring the equipment to the next user.

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), the Company will also provide:
 - Gloves: Gloves should be worn at all times where appropriate. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Employees will in no case share gloves.
 - Eye protection: Eye protection should be worn at all times while on-site.
 - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Nevertheless, employees must wear N95 respirators if required by the work and if available. Cloth type facial coverings are acceptable and encouraged when working in close proximity to other workers. It is recommended that facial coverings shall be mandatory PPE when working within 6' of other workers.
- Due to the current shortage of N95 respirators, the following Work Practice Controls should be followed:
 - Keep exposure down by using engineering and work practice controls.
 - Limit exposure time to the extent practicable.
 - Isolate workers in exposed operations by using a containment structure or distance to limit exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.
- Institute a rigorous housekeeping program to reduce exposure levels on the jobsite.
- Employees shall be educated on the general care for their personal belongings after exiting the site. This education shall include instructing them to change work clothes prior to entering their home and washing their work clothes in hot water with laundry sanitizer, daily.

Communication

- Post signage throughout the job site to remind everyone to adhere to proper hygiene, social distancing, use of PPE and cleaning and disinfecting protocol.
- Establish a communication plan for employees, visitors, and customers with a consistent means to provide updated information.

- Maintain a continuous log of every person, who may have close contact with other individuals at the work site, excluding deliveries made using proper PPE, excluding customers who may be encouraged to log but are not mandated to do so.

Jobsite Exposure Situations

- **Employee Exhibits COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, he/she must notify his supervisor and leave the job site immediately. The employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants) unless otherwise directed by a physician. Similarly, require an employee who reports to work with symptoms to return home until he or she is symptom free for 72 hours (3 full days) unless otherwise directed by a physician. To the extent practical, employees are required to obtain a doctor's note clearing them to return to work.

- **Employee Tests Positive for COVID-19**

If an employee has tested positive for COVID-19, the employee will immediately advise the employer. The employee may only return to work after completing a 14 day self-quarantine. If an employee is critical to the operation or safety of a site, the local Health department/CDC may be consulted and an earlier return to work date with precautions may be acceptable.

- **Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19**

Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) and is symptomatic, the employee shall notify their employer and follow the above protocol.

If an employee has had close contact with a person with COVID-19 and is NOT symptomatic, the employee should notify their employer and should conduct regular monitoring, wear a mask for 14 days at the work site, practice social distancing, and disinfect common areas.

If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals to take precautions listed above. If applicable, the Company will also notify any sub-contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee. The Company will immediately notify the local Health Department and DOH.

Screening

- Implement mandatory health screening assessment (questionnaire, temperature check) before employees begin work each day and for visitors. Assessment responses must be reviewed every day and such review must be documented.

Contact tracing and disinfection of contaminated areas

- Have a plan for cleaning, disinfection and contact tracing in the event of positive case.

- Have a plan in place to trace close contacts in the workplace if an employee tests positive.

Hygiene and Cleaning

- Adhere to hygiene and sanitation requirements from the Centers for Disease Control and Prevention and Department of Health and maintain cleaning logs on site that document date, time, and scope of cleaning. Delineate who will be responsible for cleaning each area and where will the log be kept.

- Provide and maintain hand hygiene stations for personnel

- Conduct regular cleaning and disinfecting at least after every shift, daily or more frequently and clean and disinfect shared objects and surfaces, high transit areas. Jobsite trailers and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC. The site Supervisor or CSRO shall ensure one or more individuals are assigned to this daily task and it is carried out.

- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.

- Any portable jobsite toilets should be cleaned and disinfected at least once daily by our cleaning crew and by the leasing company at least twice per week and disinfected on the inside, restocked sanitizer and handles wiped and cleaned after all breaks.

- The Company will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently. Signage educating employees of proper hygiene and sanitization shall be installed at toilet entries.

- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.

- Cleaning techniques such as using pressurized air or water sprays that may result in the generation of bioaerosols should be avoided.

- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids.² Notwithstanding this, the Company will clean those areas of the jobsite that a confirmed-positive individual may have contacted and it will do so before employees can access that work space again.

- The Company will ensure that any disinfection shall be conducted using one of the following:

- Common EPA-registered household disinfectant;
- Alcohol solution with at least 60% alcohol; or
- Diluted household bleach solutions (if appropriate for the surface).

- The Company will maintain Safety Data Sheets of all disinfectants used on site.

General Questions

Given the fast-developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact contact **[Title of Designated Individual]**.

Additional Resources

- OSHA COVID Guidance <https://osha.gov/SLTC/covid-19/>
- CDC Website <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- AGC Guidance <https://www.agc.org/coronavirus-covid-19>

APPENDIX A

COMPANY LOGO

Date _____ Project Name _____

Yes/ NO

- ___ ___ Are All workers discussing COVID-19 safety measures before each shift
- ___ ___ Are COVID-19 Safety Posters and Exposure Protocols posted at the work sites
- ___ ___ Does the Pre-Hazard Assessment address COVID-19 issues
- ___ ___ Have any workers exhibited COVID-19 symptoms? ___ Fever ___ Shortness of Breath
___ Cough ___ Loss of sense of smell/taste
- ___ ___ If a worker Exhibited Symptoms was there supervisor and management notified
- ___ ___ Are workers complying with the 6 foot social distancing separation
- ___ ___ If maintaining social distancing is not always possible, is interaction time limited to 10 minutes
- ___ ___ Are crew sizes limited to the minimum required to accomplish the task
- ___ ___ Are crews segregated from each other to reduce cross-exposure
- ___ ___ Are tools being shared? If yes, are tools being disinfected between uses? ___ ___
- ___ ___ Is appropriate PPE being enforced
- ___ ___ Are the appropriate sanitation and personal hygiene facilities on site sufficient
- ___ ___ Are contact surfaces disinfected regularly ie: trucks, tools, phones, doorknobs

Foremen's Signature _____

ACKNOWLEDGEMENT

I (employee) _____,
hereby state to the fact that I have reviewed
the Company's Policy for COVID-19 Exposure
Prevention, Preparedness and Response and
understand the same.

Employee Signature _____ Date _____