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Draft Template – Safely Reopening Construction Jobsites

As state governments are beginning to look ahead to how best to reopen sectors of the economy, construction can be assumed to be in most states' early phases of action. In many states, at the very least "critical" construction is already open, since construction itself is considered critical. While construction by nature is positioned to be a job more easily performed under the health and safety requirements of COVID-19, any reopening of jobsites should be done with intense focus on strict adherence to official guidance from state and federal health experts. All possible attempts should be made to ensure jobsites can continue to reopen, and another round of mass shutdowns does not need to be enacted due to an inability to maintain the safety of workers and their families.

When communicating with elected officials or regulators on the status of construction and what contractors are doing to maintain safe and productive jobsites, it is advisable to cover which standards and practices are in place on jobsites and how to best approach the decisions on which projects should be permitted and how to phase in those decisions.

The following is a template for your use. It isn't meant to be a final product by any means, but serves as a substantive starting point for you to tailor to your specific state's circumstances and the audience you are communicating with. The information included is culled from recommendations by ABC's safety team, best practices from the Construction Industry Safety Council and anecdotal feedback from ABC member contractors and chapters. ABC National's state affairs team is available to assist however possible and has a bevy of resources to help. Please do not hesitate to reach out to Brandon Ray, Nick Steingart, or Ben Brubeck for assistance, or email stateaffairs@abc.org.

In addition to the language below, consider including any of the following items:

- STEP data to demonstrate ABC's commitment to safety.
- Data-driven arguments based on the number of people employed in the industry in your state/cities. ABC National can help pull this data if it is not readily available.
- If the chapter has an apprenticeship program that has been shut down, discuss the need to resume the program safely to continue developing a skilled workforce/recruit economically displaced workers into the construction industry.
- Templates for "toolbox talks."
- A version of the template safety report. (See below.)
- An arsenal of images and anecdotes that "tell the story" of your members and their commitment to safety in light of the virus.



Draft Letter

As representatives of X number of member contractors in the commercial and industrial construction industry, ABC Chapter is encouraged by the decision to attempt to reopen construction jobsites and do so in a safe and sensible manner. We feel that much of the work in construction can be performed in a way that uses proper mitigation and distancing techniques to slow the spread of COVID-19 while also allowing these important projects to be completed.

We appreciate your engagement of industry stakeholders and your recognition of the necessary jobsite and supply chain considerations that will allow us to safely return to work while avoiding a step back in the fight against this pandemic. As XX considers a phased-in approach to reopening the economy, ABC has developed a potential course of action that would safely reopen construction jobsites across our communities and jumpstart economic recovery. These approaches would serve to supplement the jobsite safety procedures outlined below. (Please tailor the following approaches to your state and situation. Keep in mind that a combination of these approaches may also be utilized. This section will need to be customized based on the type of construction already permitted/restricted in your state and localities.)

Approach A – Scope of Work

This approach would allow the state to authorize construction to continue based on the type of project. Construction planned in the areas first recommended for reopening by the CDC and FEMA, such as schools, could be included in the first phase allowing construction to reopen. States with widespread construction shutdowns could refer to CISA guidance 3.0 as a starting point to reintroduce construction back into the economy.

Approach B – Jobsite Density

The state could allow construction to resume on a "person per square foot" basis to ensure proper social distancing measures are followed and the threat of outbreaks on jobsites is minimized to the fullest extent possible.

Approach C – Based on Existing Project Progress

Abandoned jobsites, if not properly secured, present a threat to public safety because they are targets for vandalism and material theft. Additionally, site deterioration is a concern the longer jobsites remain empty. Therefore, projects that began before stay-at-home and shelter-in-place orders could be the first to resume.

Other Potential Approaches

High-density population centers or areas that have been identified as "hotspots" would continue to see limits on construction work, while areas that have not seen the same level of proliferation of COVID-19 would be allowed to resume construction.



We also recommend that, in light of initial jobsite shutdowns due to the virus, there be a discussion of contractual relief between contractors and construction owners where delays in project timelines are unavoidable if a specific contractor or a full jobsite were unable to work. While adherence to all possible construction timelines is vital, and while our contractors have done everything possible to continue essential work safely, supply chain issues and jobsite safety protocols have made it difficult to maintain the planned timelines set out before the emergence of COVID-19 on many projects. This could have severe consequences for contractors moving forward if not remedied.

In addition to prevention recommendations issued by the CDC, contractors have implemented a number of measures to keep workers safe and stop the spread of COVID-19. While many crafts within the construction industry are already socially distanced based on the nature of work, additional safety precautions have been applied by contractors across the industry, including:

Jobsite Density

- Staggered breaks, lunches and scheduling to reduce workforce density on jobsites.
- Reduce, if not eliminate altogether, the use of tools by multiple workers. Tools that
 must be shared must be wiped down before being reused or stored at the end of every
 shift.
- Reduce the number of jobsite visitors, while properly screening those who are deemed "necessary" to be on site and wearing proper gloves and eye protection at all times.
- While most construction workers must be on site to carry out their responsibilities, workers who are able to telework are instructed to do so.
- Food truck access is limited or eliminated altogether on projects to maintain social distancing.

Employer Responsibilities

- Maintain compliance with all federal/state regulatory requirements, including OSHA guidance on recordkeeping.
- Ensure all jobsites have appropriate materials/posters/notices for employee COVID-19 guidance.
- Consult with legal counsel to ensure up-to-date compliance with employer-facilitated benefits available to employees or families infected with COVID-19.
- Appoint a safety officer to oversee the development and implementation of an official COVID-19-related safety plan.



Supervisor Responsibilities

- Ensure all workers are educated on both the general points of knowledge of the virus (symptoms, method of spread, etc.) and their personal hygiene/mitigation responsibilities.
- Facilitate "toolbox talks" and equip workers with the necessary materials for instruction.
- Maintain strict adherence to mitigation requirements and constant monitoring of employee health, including the barring of workers showing symptoms from jobsites.

Employee Responsibilities

- Maintain proper mitigation and personal hygiene as instructed by the CDC, including frequent handwashing, respiratory etiquette and social distancing.
- Monitor personal health and that of families or close contacts, and stay home if suspected infection has occurred.
- Properly disinfect tools and equipment following use.
- See attached for further details on the above processes.

Additional Hygiene Responses

- Personal protective equipment is assigned to be used by individuals only, not shared among groups.
- Provide adequate hand-washing facilities on projects, particularly at break areas, and increase disinfecting of hand washing and water drinking fountains.
- Suspend biometric or other fingerprint time signatures.
- Use portable bathroom trailers or ensure daily or twice-daily cleaning of portable toilets.
- Provide hand sanitizers at strategic locations throughout the project.

<u>Additional Compliance Measures</u>

• ABC X has advocated for a continued inspections process, either virtually or in person where it is deemed safe, in order to keep contractors accountable to existing rules, as well as COVID-19 directives issued by the CDC and state and local governments.

Please review the attached materials for a more detailed demonstration of the measures being taken by ABC member contractors. ABC members and the rest of the construction industry stand ready to return to jobsites safely and continue to build America and help rebuild America's economy.

Sincerely,





Keeping Workers Safe:

Recommended Guidance for the Construction Industry to Address Worker Health and Jobsite Safety in Response to COVID-19

Disclaimer: This document provides guidance, best practices and standards for construction industry professionals to incorporate into their coronavirus safety plans. The recommendations are intended for general use to protect employees and the public from possible exposure to COVID-19. The samples and guidance contained herein are not intended to be all-inclusive.

1. GENERAL BACKGROUND

Employers should provide employees with information on how to identify COVID-19 symptoms, when to seek medical care and how to take extra precautions. This information, including infographics, can be found on CDC's <u>website</u>. Common symptoms of COVID-19 are:

- 1. Fever
- 2. Sneezing
- 3. Coughing
- 4. Sore throat
- 5. Shortness of breath
- 6. Vomiting
- 7. Bowel issues

Virus Spread: COVID-19 is commonly spread between people who are within six feet of each other through respiratory droplets produced when an infected person coughs or sneezes. Most of these droplets fall on nearby surfaces and objects, such as desks, tables, telephones, tools and equipment, including heavy equipment. Individuals can catch COVID-19 by touching contaminated surfaces or objects and then touching their eyes, nose or mouth.

Presumption of Infection: CDC recommends if an individual has shown related symptoms to assume that he/she has COVID-19 and immediately carry out precautionary measures.

2. ADDITIONAL OFFICE POLICIES

Supplemental COVID-19 Office Policy Statement: Employers are encouraged to create a supplemental office policy that outlines practical methods to prevent the spread of COVID-19, reduce risks and ensure safety measures are implemented in accordance with federal and state



law. It is recommended COVID-19 supplemental office policies be circulated to all staff and returned to Human Resources with an acknowledgement the employee received, read and understands the policies. *See Appendix A.*

Health and Safety Officer: Contractors are encouraged to designate and train a site-specific health and safety officer to enforce company protocols. The officer should be present on the construction site to ensure protocols and office policies are followed. It is generally recommended that each jobsite have its own health and safety officer, but because each jobsite is different, employers should consider the number of crafts and workers present at the site to determine the most appropriate number of health and safety officers that may be needed.

Please refer to OSHA 3990-03 2020 for additional guidance.

Health and Safety Officer Training: Proficient health and safety officers should be proactive, ensure mitigation protocols are adhered to, and be able to evaluate workplace(s) to determine the best practices to follow specific to the worksite and conditions. Employers should consider officer training in the following areas:

- Screening employees. See Appendix B.
- Recognizing the causes of COVID-19.
- Recognizing the symptoms of COVID-19.
- Responding to an infected individual.
- Conducting workplace assessments.

Employee Education and Training: Employers should provide employees with information, resources and trainings to ensure full compliance with mitigation efforts.

Supply Disruptions: Workplaces should be prepared for the inevitable delays, shortages or even cancellations of items and supplies related to infection prevention, such as toiletries and hand sanitizer.

Administrative Office Guidance: At physical office locations, employers should consider the following temporary policies:

- Allowing only essential personnel access to the building.
- Designating an employee to monitor entrances.
- Limiting the number of personnel allowed in the building.



- Avoiding sharing office supplies or workstations.
- Using disposable products whenever possible.
- Encouraging employees to bring a personal thermometer to work.
- Increasing the frequency of replacing filters for HVAC systems.

Telecommuting Policy: If practical, employers should consider telecommuting policies that include expectations for work hours, equipment and cybersecurity policy, payments or reimbursement for data lines, communication methods with internal and external audiences, and accountability.

Flexible Work Policy: If practical, employers should consider developing interim policies that permit employees to stay home to care for a sick family member, care for children at home due to school and childcare closings and monitor at-risk family members at home. Employers should make a good-faith effort to accommodate employees who are fearful of coming to work because of possible exposure.

3. RESPONSIBILITIES OF EMPLOYERS, MANAGERS AND SUPERVISORS

COVID-19 office policies should include responsibilities of managers, supervisors and safety officers, as it will be a part of their function to be familiar with policies and answer questions from employees. In addition, managers, supervisors and safety officers should set a good example by following office policies, including, but not limited to, practicing good personal hygiene.

Employers should make available and provide educational resources for social distancing and other protocols that will be implemented at physical offices and at jobsites. Office policies and procedures should list required reporting steps if an employee is experiencing signs or symptoms of COVID-19.

As a guide, please refer to OSHA 3994-04 2020 entitled, Ten Steps All Workplaces Can Take to Reduce Risk of Exposure to Coronavirus.

4. RESPONSIBILITIES OF EMPLOYEES

COVID-19 office policies should explain that employees are expected to follow mitigation efforts while at work. If an employee develops a fever and symptoms of respiratory illness while at home, such as cough or shortness of breath, employer protocols should clearly advise the employee not to go to work and to call their healthcare provider immediately. If an employee is



concerned that he/she may have come into close contact with an individual showing symptoms, he/she should call their healthcare provider.

If an employee is concerned about their health, they can utilize <u>CDC's Self-Checker</u>.

5. RESPONSIBILITIES OF GENERAL CONTRACTORS AND SPECIALTY CONTRACTORS

Coordination between general contractors and specialty contractors is an important facet of the screening and monitoring processes. General contractors are responsible for overseeing the entire jobsite and ensuring COVID-19 protocols are followed. Likewise, specialty contractors should work closely with general contractors to ensure employees are properly screened, if appropriate, and if employee screenings are required, to provide documentation to the general contractor.

6. INDIVIDUAL ASSESSMENTS BEFORE GOING TO CONSTRUCTION SITES

Employers should consider establishing self-assessment protocols before employees arrive at the jobsite. Protocols may include:

- Encouraging employees to take their temperature at home.
- Taking a picture of the thermometer with a date and timestamp and sending the picture via text to the health and safety officer before heading into work.
- Requiring sick workers to stay home and immediately notify the health and safety officer.
- Requiring employees who are well but have a sick family member with COVID-19 to notify the health and safety officer and strictly follow CDC-recommended precautions.

7. JOBSITE CONTROLS

Note: Employers should follow all existing OSHA standards for occupational tasks on the jobsite.

Identify Risk Factors: Occupational exposure to COVID-19 may vary from high to medium to low risk. The level of risk depends, in part, on the industry type, the type of work or the possibility of having had contact with persons known to be, or suspected of being, infected with COVID-19. To help employers determine appropriate precautions, OSHA divided job tasks into four risk exposure <u>levels</u>.



Confirmed or Possible COVID-19 Case Protocols: Employers should develop protocols in the event an employee becomes sick, which may include quarantine at home for no less than 14 days. If an employee becomes sick or is a probable case, sample protocols include:

- Closing off all areas accessed by the employee, if practical.
- Increasing air circulation in the exposed area, if practical.
- Waiting 24 hours before cleaning and disinfection, if practical.
- Listing employees that were in close contact with the person from 48 hours before symptom onset to the time at which the person was isolated. Employees that had close contact with a sick employee should be considered exposed.
- Sending sick employee home. Surfaces and tools should be cleaned and disinfected.
- Requiring the employee to remain at home until he/she is symptom free for 72 hours—three full days—without the use of fever-reducing or other symptom-altering medicines, such as cough suppressants.
- If possible, employees should obtain a doctor's note clearing them to return to work.
- Notifying employees who were in close contact with the sick person. See Appendix E.
- If a confirmed case of COVID-19 is reported, employers should determine if the case meets the criteria for reporting under OSHA's recordkeeping rule.

Jobsite Temperature Screening: [If applicable] Pursuant to the X State Department of Health, businesses are required to develop temperature screening protocols for all employees <u>upon</u> <u>discovery that the business has been exposed</u> to a person who is a probable or confirmed case of COVID-19.

If this occurs, employers should measure and document an employee's temperature and assess symptoms prior to starting work and throughout the day. It is encouraged that screenings be conducted before each shift, after lunch breaks and before employees go home. A good practice is to ask employees to bring their own personal thermometer to conduct the screenings. Protocols should also include steps to reviewing screening documents and how to report items that may have been missed or overlooked if an employee shows signs of symptoms. See Appendix B.

Jobsite Visitors: Employers should consider screening visitors to the jobsite. See Appendix C.

Jobsite Deliveries: Employers should consider delivery policies that follow minimal-contact and cleaning protocols. Delivery personnel should remain in their vehicles, if possible.



Social Distancing: The goal of social distancing is to reduce the amount of physical interaction between people to help slow or mitigate the spread of the disease. Employer policies should include:

- Keeping a six-foot separation from other employees as often as possible.
- Staggering craft work schedules to reduce density and maintain a minimum 6-foot separation.
- Where practical, increasing physical space between employees at the worksite.
- Where work trailers are used, only necessary employees should enter the trailers, and all employees should maintain social distancing while inside the trailers.
- Implementing flexible meeting and travel options.
- Postponing nonessential meetings or events.
- Using noncontact methods for greeting in lieu of shaking hands.
- Wearing gloves while working in order to limit direct contact with possible infected surfaces.
- Maintaining social distancing during lunch and breaks.
- Not sharing food, drinks, dishes or utensils.
- Not riding as groups in vehicles.
- Limiting the use of phones, email or text messages, if used for communications.
- Limiting use of radios, if used for communications.
- Prohibiting or limiting public access to the construction site.
- Limiting family-member or other personal interactions at the construction site.
- Prohibiting congregation in common areas or break rooms.
- Limiting face-to-face conversations and maintaining appropriate distances when meetings need to take place.

Construction Site Hygiene: Employers are encouraged to develop strong hygiene policies to avoid cross contamination and safeguard employee health and safety. Sample policy recommendations include:

Disinfecting surfaces following <u>CDC guidelines</u>.



- Before and after shifts, disinfecting all surfaces, tools and equipment, including heavy equipment.
- Cleaning the jobsite daily and after major tasks are completed.
- Cleaning company vehicles at least once per day and before a change in operator or rider. Safety officers should provide standardized forms for employees to document when disinfecting occurred throughout the workday.
- Cleaning and disinfecting tools before and after shifts. Safety officers should provide standardized forms for employees to document when disinfecting occurred.
- Identifying tools that are likely to have a high frequency of sharing and ensure those tools are regularly cleaned and disinfected.
- Placing wash stations or hand sanitizers in multiple locations to encourage hand hygiene and schedule regular handwashing breaks.
- Ensuring areas are properly ventilated.
- Ensuring handwashing posters are conspicuously displayed throughout the jobsite.
 - Employees should be instructed to wash hands frequently with soap and water for a minimum of 20 seconds in duration.
- Using hand sanitizer during the work shift containing 60% alcohol content or greater if soap and water is not readily available.
- Wearing personal protective equipment (PPE), including work gloves or medical (latex or nonlatex) gloves.
- Wearing dust masks or face (mouth) coverings while at the jobsite. Face masks should be washed daily. See Appendix D.
- Wearing eye protection at all times.
- Implementing policies for removal and disposal of gloves.
- Collecting and removing trash frequently by wearing nitrile, latex or vinyl gloves.
- Providing clean containers for water that are clearly labeled and have drinking fountain spouts or faucets that can be used to fill single-use water cups.
 - Water should not be dipped from the container.
 - o If there is a nonpotable water source on the jobsite, it should be clearly labeled that the water is not safe for drinking, washing or cooking.



- Providing separate bathroom facilities for every 20 employees (or fewer) of each gender on a jobsite.
 - For example, if there are 30 men and 10 women, three bathrooms are recommended.
 - Bathrooms may contain a toilet and urinal, but is it recommended at least half should have a toilet.
 - If there are fewer than five employees on a jobsite, single bathroom facilities may be advisable if they can be locked and contain a toilet.
 - Bathrooms should be private and in good working order with an adequate supply of toilet paper.
 - o Health and safety officers should inspect and clean bathroom facilities daily.
 - Health and safety officers should document and post when bathrooms were cleaned.



APPENDIX A

SAMPLE EMPLOYER COVID-19 COMPLIANCE CHECKLIST

| | | YES | NO |
|-----|---|-----|----|
| 1. | Have the COVID-19 guidelines been posted in a location for workers to observe? | | |
| 2. | Have all required PPE been made available to all on-site personnel? Have all personnel been instructed on the best practices for the use of PPE prior to the start of the work shift? | | |
| 3. | Have handwashing instructions been posted on the project site? | | |
| 4. | For site specific project locations, have wash stations been installed? | | |
| 5. | Has a procedure been established for workers to certify their health to their supervisor prior to the start of each shift and identify the responsible person on site to manage this provision? | | |
| 6. | Has signage been posted to prohibit unauthorized visitors to enter the contractor field offices? | | |
| 7. | Have jobsite cleaning and decontamination procedures been established? Have these been shared with contractor/subcontractor employees? | | |
| 8. | Has a "No Congregation" policy been put into effect that states that individuals must implement social distancing by maintaining a minimum distance of sixfeet from other individuals? | | |
| 9. | Are meetings being held via electronic means, and any required on-site meetings being held following social distancing practices including limiting attendance to 10 persons? | | |
| 10. | Are individual crew meetings being held outdoors and following social distancing requirements? | | |
| 11. | Are all restroom and portable restroom stations being sanitized consistent with guidance, and are these locations provided with soap, hand sanitizers and paper towels? | | |
| 12. | Have all field office common areas been cleaned in the last 24 hours, and soap, hand sanitizer and paper towels provided? | | |
| 13. | Have workers been instructed to bring food from home and practice appropriate hygiene while eating lunch and at breaks, including social distancing? | | |
| 14. | Have employees been instructed about appropriate personal hygiene and staying home when either they or a family member is feeling sick? | | |
| 15. | Are all employees driving to the jobsite/parking area in a single occupant vehicle? | | |
| 16. | Are all employees utilizing the proper PPE for conditions where required social distancing is not achievable? | | |



APPENDIX B

SAMPLE EMPLOYEE SCREENING QUESTIONNIARE

If an employee answers "Yes" to any of the screening questions, immediately activate your company's emergency protocol. The screener should:

- Ensure the screening results are accurate.
- Ask the employee to go home and call their primary care physician.
- Notify management.

| oject Name: | | |
|---|-----|----|
| Employee Name: | | |
| Health and Safety Officer: | | |
| Date: | | |
| Temperature Scan Results: | | |
| | Yes | No |
| 1. Have you or someone in your household or workplace been in close contact with a person who has signs of or has COVID-19? | | |
| 2. Have you been medically directed to self-quarantine? | | |
| 3. In the last 72 hours, have you had: a new fever of 100.4°F, a new cough, shortness of breath, sore throat, new muscle aches or a loss of taste or smell? | | |
| 4. Do you have a clean face mask and other proper PPE? | | |



APPENDIX C

JOBSITE VISITOR QUESTIONNAIRE

Employers should consider screening visitors. If a visitor answers "Yes" to any of the following sample questions, he/she should not be permitted to access the jobsite.

| Pro | eject name: | | |
|----------------------------|--|-----|----|
| Visitor name: | | | |
| Health and safety officer: | | | |
| Da | te: | | |
| Reason for visit: | | | |
| | | Yes | No |
| 1. | Have you been confirmed positive for COVID-19? | | |
| 2. | In the last 72 hours, have you had: a new fever of 100.4°F, a new cough, shortness of breath, sore throat, new muscle aches or a loss of taste or smell? | | |
| 3. | Have you or someone in your household or workplace been in close contact with a person who has signs of or has COVID-19? | | |
| 4. | Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms? | | |



APPENDIX D

HOW TO MAKE A HOMEMADE MASK

Materials Needed:

- Fabric (100% cotton is most effective)
- Fabric ties
- Scissors
- Sewing machine or a needle and thread

Instructions:

- Measure and cut two pieces of fabric in a rectangle pattern to fit snugly around the face (size 12 inches by 6 inches is standard for adults).
- Tightly sew both layers together on all edges.
- Cut fabric ties to fit around the ears.
- Sew the ties to the insides of the mask on the smaller edge, repeat on both sides.
- Resew the sides to ensure a tight seal between both pieces of fabric and the ear ties.



APPENDIX E

CLOSE CONTACT EMPLOYEE NOTIFICATION MEMORANDUM

TO: Close Contact Employee Name

FROM: Manager/Supervisor's Name

DATE:

RE: Confirmed COVID-19 Case Reported

We have been informed by one of our [employees/customers/vendors] working at [jobsite] that he/she has a confirmed case of COVID-19, commonly known as "coronavirus," based on test results obtained on [date]. Per company policy, this [employee/customer/vendor] has been directed to self-quarantine until permitted to return to work.

We are alerting you to this development because, based on the company name's investigation, we believe that you may have been in contact with the confirmed-positive case, on or about [date]. Based on company's name policy, we are directing you not to report to work until [14 days from your last contact with the confirmed case]. In the interim, we encourage you to seek medical advice and a COVID-19 test, especially if you are exhibiting symptoms of the virus.

If you do not test positive for COVID-19, or experience symptoms, by [14 days from your last contact with a confirmed case], you may return to work. However, please inform [company contact name] if any of the following occur during your self-quarantine: you experience flu-like symptoms, including fever, cough, sneezing or sore throat; or you test positive for COVID-19.

We are committed to providing a safe working environment for all our employees and topquality service to our customers. It is in the interest of those goals that we provide this information out of an abundance of caution.

We also want to take this opportunity to advise you that we will treat information regarding the identity of employees [or customers] with suspected or confirmed cases of COVID-19 in confidence to the extent practicable, and will comply with applicable laws regarding the



handling of such information. Further, per company's name policy, we will not tolerate harassment, discrimination or retaliation against any employee [or customer].

Please contact [company contact's name] at [phone number] or [email address] if you have any questions or concerns.