

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. In order to allow the continuance of construction projects across our state and to minimize the spread of COVID-19 at our jobsites, it is important that everyone plays their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. 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.

A. 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)
- All meetings conducted in-person shall be done so outside whenever possible, or in ventilated spaces, ensuring all employees are a minimum of 6 feet apart from one another. 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. 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. 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.

B. 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 100 square feet. Workers should wash or sanitize hands immediately before starting and after completing the work.

C. Job Site Visitors

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

D. Personal Protective Equipment and Work Practice Controls

- 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.

E. Jobsite Exposure Situations

- **Employee Exhibits COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, 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). The Company will 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). 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**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least ten (10) days have passed since the date of his or her first positive test, and have not had a subsequent illness. Employees who test positive and are directed to care for themselves at home may return to work when: (1) at least 7 days have passed since recovery;³ and (2) at least ten (10) days have passed since symptoms first appeared. Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. The Company will require an employee to provide documentation clearing his or her return to work.

- **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) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as six (6) feet for a prolonged period of time.

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 who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee. 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. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.³ Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

Job Site Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work 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.

OSHA Recordkeeping

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 but is not a confirmed diagnosis, the recordability analysis is not necessarily triggered at that time.

HOWEVER, until further notice, “OSHA will not enforce 29 CFR §1904 to require other employers to make the same work-relatedness determinations, except where:

1. There is objective evidence that a COVID-19 case may be work-related. This could include, for example, a number of cases developing among workers....
2. The evidence was reasonably available to the employer. For purposes of this memorandum, purposes include information given to the employer by employees, as well as information that an employer learns regarding it’s employee’s health and safety in the ordinary course of managing it’s business.

Confidentiality/Privacy

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. The Company reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. The Company also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

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 _____