

KEEPING WORKERS SAFE

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

ABC Pennsylvania's COVID-19 Construction Safety Task Force Report

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Task Force Mission, Objectives, and Members

Mission:

The COVID-19 Construction Safety Task Force will review resources relating to COVID-19 health and safety protocols, listen to the concerns and ideas from stakeholders, and provide a report to the Governor and Pennsylvania General Assembly to ensure the construction industry can return to work in a safe and responsible manner.

Objectives:

- 1. Create a comprehensive health and safety document that provides guidelines for the construction industry both during and after the COVID-19 pandemic.
- 2. Prepare a report for Governor Wolf and the Pennsylvania General Assembly.
- 3. Develop a communications plan to distribute the safety materials to elected officials and other interested parties.

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Executive Summary

The guidelines contained in this report were evaluated and assembled through the work of a special COVID-19 Construction Safety Task Force. The task force participants include experienced safety experts across all five ABC Pennsylvania chapters who have generously shared their collective resources aimed to protect employees and jobsites from COVID-19. Our goal in this work is to provide resources and ongoing support to employers that may need guidance, best practices, and standards to incorporate into their COVID-19 safety plans.

We recognize the obligation contractors and specialty contractors have in protecting their employees and the public from COVID-19. In general:

- 1. Contractors and specialty contractors should create a health and safety plan that adheres to COVID-19 social distancing, mitigation, and cleaning protocols, as recommended by the Centers for Disease Control and Prevention (CDC).
- 2. Contractors and specialty contractors should post at each jobsite their COVID-19 control, mitigation, and safety plan.
- 3. Commercial construction workers should wear personal protective equipment (PPE) at all times.
- 4. Employers should develop temperature screening protocols for all employees upon discovery that the business has been exposed to a probable or confirmed case of COVID-19.

Guidelines for the Construction Industry

Disclaimer: This Report provides guidance, best practices, and standards for construction industry professionals to incorporate into their coronavirus (COVID-19) safety plans. The guidelines 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.

This Report is intended for informational purposes. It was prepared by referencing information provided by reputable sources both governmental and non-governmental. ABC Pennsylvania has made every reasonable effort to ensure the accuracy of the information contained herein. The contents of this Report are not intended to be legal advice and all who receive this Report should consult with their attorneys for specific legal advice.

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.

1. 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 to federal and state law. Employers are encouraged to circulate COVID-19 supplemental office policies to all staff 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 at each jobsite and ensure policies are followed. Because each jobsite is different, employers should consider the number of trades and the number of employees present at the site to determine the most appropriate number of health and safety officers that may be needed. *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 are encouraged to 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.
- Avoid 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.

2. 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 an example by following office policies, including, but not limited to, practicing good personal hygiene.

Employers are encouraged to 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*.

3. 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 CDC's Self-Checker here.

4. RESPONSIBILITIES OF GENERAL CONTRACTORS AND SPECIALTY CONTRACTORS

The coordination between general contractors and specialty contractors are important facets 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.

5. 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.

6. 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, 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 are encouraged to 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: Pursuant to the Pennsylvania Department of Health's Frequently Asked Questions on "Safety Measures for Businesses Permitted to Maintain In-person Operation," businesses are required to develop temperature screening protocols for all employees <u>upon 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 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. Sample policy guidelines include:

- Keeping a 6-foot separation from other employees as often as possible.
- Staggering trade 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 non-essential meetings or events.
- Using non-contact 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, if being used for communications.
- Limiting use of radios, if being used for communications.
- Prohibiting or limiting public access to 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 guidelines include:

- Disinfecting surfaces following CDC guidelines.
- Before and after shifts, disinfecting all surfaces, tools, 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 percent alcohol content or greater if soap and water is not readily available.
- Wearing personal protective equipment (PPE), including work gloves or medical (latex or non-latex) 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 non-potable 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.
 - o For example, if there are 30 men and 10 women, three bathrooms are ideal.
 - o Bathrooms may contain a toilet and urinal, but at least half should have a toilet.
 - o If there are fewer than five employees on a jobsite, single bathroom facilities may be advisable if it can be locked and contains a toilet.
 - Bathrooms should be private and in good working order with an adequate supply of toilet paper.
 - Health and safety officers should inspect and clean bathroom facilities daily.
 - o Health and safety officers should document and post when bathrooms were cleaned.

APPENDIX A 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 identified 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 6-feet from other individuals?		
9.	Are meetings being held via electronic means, and any required on-site meetings being done 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 about 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 EMPLOYEE SCREENING QUESTIONNAIRE

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.

Pr	Project Name:		
Er	Employee Name:		
Н	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 person with 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.	Does the worker 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:

Project Name:			
Visitor Name:			
Health and Safety Officer:			
Date:			
Rea	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 person with 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 earpiece.

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/customer/vendor] 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 last contact with 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 last contact with 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 top-quality 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.