Department of Labor and Economic Opportunity

Return to work guidelines for construction

PRELIMINARY AND PRE-DECISIONAL | MAY 6TH, 2020

As of 5/6/2020 at 4pm
Eight steps for employers to keep their workers safe, within the hierarchy of controls

1. Administrative controls
2. Access control
3. Distancing
4. Sanitation
5. Hygiene
6. PPE
7. Positive case protocols
8. Facility closure
Administrative controls

Create an exposure control plan

• Document and share written exposure control plan to mitigate employee exposure

• This plan should include an exposure risk determination for all employees, and detail measures employer will take to prevent exposure, including:
  – Administrative controls, including access
  – Engineering controls, including any steps taken to physically reconfigure the workspace and workflows
  – Policies governing social distancing
  – Policies governing personal hygiene
  – Policies governing cleaning and disinfection
  – Policies governing personal protective equipment
  – Policies governing

• The exposure control plan should incorporate the latest guidance for COVID-19 from the Center for Disease Control and Prevention (CDC), and any federal requirements issued by: federal, state, county, and municipal authorities; employers; and project owners

• The exposure control plan may differentiate between workers commensurate with their exposure risk, with more stringent measures for higher risk categories
Administrative controls

Establish response owners

- Team members with individual accountability should be identified, tasked with management and direct verification of implementation of all elements of the exposure control plan.
- At minimum, one COVID-19 response manager should be identified for every individual worksite and project.
- If feasible and depending on size of worksite, consider dedicating staff to virus response (sole or primary responsibility).

Define the scope of the response team, including:

- Design, implement, and report out to management on workplace risk mitigation program.
- Create and complete a “health checklist” or daily symptom tracking survey.
- Establish points of contact and appropriate communications cadence with relevant labor union and state and local public health agencies.
- Work with the relevant labor union to improve safety protocols and to ensure robust enforcement and reporting of workplace health / safety events.
- If feasible, leverage a digital tool or dashboard to track implementation of protocols and opportunities to tighten or improve.
Administrative controls

Train employees

• All employers should conduct a safety stand-down toolbox talk or tailgate training, on all jobsites, before resumption of work

• The curriculum of this training should:
  – Explain all elements of the exposure control plan, with specific guidance on access control, distancing, sanitation, hygiene, and use of personal protective equipment
  – Include demonstration of proper use of personal protective equipment, including donning and doffing
  – Explain worker’s rights and protections, including access to leave, and specify the steps that the employee can take if they feel unsafe in the workplace

• Training should be jointly led by the ranking manager on the jobsite, a labor union representative, and designated members of the COVID-19 response team
Administrative controls: example

Establish team or roles

Define scope of team (e.g., manage implementation of practices and protocols)

LEADERSHIP & MANAGEMENT

- Identify the person responsible for auditing implementation on each project. That will be the site safety representative (e.g., safety person, superintendent). The COVID Safety Rep Checklist should be used daily to ensure proper implementation. Reference Appendix C – COVID-19 Safety Representative Checklist
- Project teams to attend the daily huddles and make these action plans a topic of huddle conversation. Similar to safety ask the question – “How will or what can we do to keep ourselves healthy today.” (REMEMBER: SMART Social Distancing.)
- INCIDENT COMMANDER: Have been identified by the company. Reference Appendix A – Incident Commanders by Region. If an infected person is identified, the respective Incident Commander is to be notified. Respect and maintain each person’s dignity and privacy. Reference Appendix B – Incident Control Plan.
- Implementation is a team responsibility, led by the Project Manager or Superintendent.
- The Project Manager is to communicate the plan and updates to all Suppliers, Subcontractors, Vendors, and Service Providers.
- The Project Executive is to communicate the plan and updates to the Customer.
- If a project is being re-started or is a new project reference Appendix F – COVID-19 New Project and Restart Guidance
- If a person notifies us that they were infected, report the incident to the INCIDENT COMMANDER immediately.
- If possible, at your site or campus create an isolation area for these individuals that show/have symptoms of COVID-19. Also, consider on-site nursing stations where applicable.
- Be aware of worker’s concern about pay, leave, safety, health, and other issues related to the crisis.

COVID-19 Virus Prevention

The COVID-19 virus has spread quickly across the United States. Every state has felt the impact and many varied with the virus.

This virus is highly contagious. A contaminated person can spread the infection when they cough or sneeze, or if they touch their eyes, nose, or mouth with an infected hand.

To prevent the transmission of the virus, we must first understand how it spreads - from person to person.

Toolbox Talks Points

1. Wear a mask, wash hands frequently, and stay six feet apart. This reduces the spread of COVID-19.
2. Avoid close contact with sick people.
3. Avoid large gatherings and public transportation.
4. Maintain good hygiene and cleanliness in the workplace.
5. Implement social distancing measures.
6. Clean and disinfect frequently touched objects and surfaces.
7. If you are feeling sick, stay home and contact your healthcare provider.
8. Follow your employer’s policies and procedures for COVID-19.

Be aware of worker’s concern about pay, leave, safety, health, and other issues related to the crisis.
Reduce congestion at start times and entry points

• Employers should assign dedicated entry point(s) for all employees or groups to reduce congestion at main entrance, help with screening needs, and help with tracing

• Employers should label queue spots with X’s outside building in case of congestion

• If feasible, employers should consider staggering start times for locations to ensure social distancing and effectiveness of screening protocols (50/50 rotational schedules)

• If feasible, employers should create one-way flow corridors onto the site, wherever possible

Screen employee health / exposure:

• Employers should conduct daily entry self-screening protocol for all employees i.e., symptom tracking and exposure questionnaire

• Employers should take worker temperatures as a condition for daily site entry

• Workers should be barred entry if they have a fever (100.4°F based on temperature checks); or otherwise if the employee identifies coughing, or shortness of breath each day before leaving for work, before the shift, mid-shift, and at end of shift
Control site access for non-employees

- Employers should bar all non-essential visitors and contractors from the worksite.

- Employers should require that essential visitors and contractors should schedule their visits ahead of time and attain explicit approval before arrival (e.g., conduct visitor questionnaire virtually and deny visitors who do not meet requirements).

- Employers should control site access (e.g., restrict visitors, contractors, deliveries – implement screening practices similar to employees), or in the alternative issue stickers or other indicators to workers to show that they received a screening before entering the worksite that day.

Consolidate entry points

- Employer should put physical barriers (e.g., caution tape, plastic netting, gates) in place to prevent anyone from bypassing screening (if not possible, ensure there is some indication of employees having gone through screening – e.g., sticker).
Restrict business and personal travel

• Employers should only permit business critical travel

• Employers should reduce risk from contractors by restricting unnecessary movement between project sites and establishing minimal handoff deliveries

• Employers should require 14-day quarantine after returning from any necessary personal travel (confirm with site leader upon return)

If possible, modify transportation practices

• If transportation is employer owned / managed, employer should consider utilizing assigned seating to simplify contact tracing should an employee be diagnosed as COVID-19 positive

• Employers should work with transportation provider(s) to review health screening (reducing shift changeover time) and disinfection protocols for seats and other common surfaces
Access control: example

Screen employee health/exposure (home, entrance)

Example signage
Increase distance between people

- Employers should establish sitewide requirement for social distancing in accord with CDC guidelines (6 ft) [When 6 ft distancing is not feasible, workers are at higher risk; see PPE section for additional guidance]

- Employers should eliminate occasion for interactions with visitors or the general public

Limit use of common spaces

- Employers should identify (with signage) and consider closure / occupancy limits for common choke points where workers are forced to stand together, such as hallways, hoists and elevators, break/lunch areas, buses (see “provide reinforcements” section for details)

- Employer should require physical distancing in lunch and break areas and provide physical markers (e.g., tape on the ground to assist)

- If feasible close break/lunch areas if possible and encourage employees to eliminate eating in groups (eat in personal vehicles)

- Employers should consider increasing distancing for portable restrooms on site: e.g., increase number of restrooms, timing between use (e.g., employee to monitor)

- Employers should install touchless waste bins; turn off shared water fountains
Stagger shifts and timing to reduce congestion

- Employers should consider staging / staggering crews and modifying work schedules to limit number of workers on site
- Employers should consider Stagger start times and meal times (e.g., by 15 mins)
- Employers should minimize interactions when picking up or delivering equipment or materials (e.g., PPE, surface disinfection), and organize the placement of materials to minimize movement on the work site

Provide visual cue to reinforce distancing expectations

- Employers should employ visual cues to enforce distancing wherever possible (e.g., tape, ground markings, walking traffic patterns marked, physical barriers, elevator guidelines, signs with social distancing requirements)
- Employers should post signage and train people not to congregate at break areas, toolboxes & tool cribs, lunch areas, etc.
3 Social distancing

Limit common space use and operations

- Make sure there are enough temporary/portable toilets on site, per contract requirements. Increase cleaning of toilets to three (3) times per week and make sure they are properly stocked with supplies. Work with your project vendor. OSHA current guidance is:

<table>
<thead>
<tr>
<th>Number of employees</th>
<th>Minimum number of toilets</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 15</td>
<td>1</td>
</tr>
<tr>
<td>16 to 50</td>
<td>2</td>
</tr>
<tr>
<td>51 to 100</td>
<td>3</td>
</tr>
<tr>
<td>101 to 150</td>
<td>4</td>
</tr>
<tr>
<td>Over 150</td>
<td>5</td>
</tr>
</tbody>
</table>

Provide reinforcements (e.g., X’s) for distancing expectations

(Association with a post that says:)

ATTENTION

NO HANDSHAKES

Until further notice, this is a handshake-free zone. Please remember to wash your hands frequently. Thank you!

(Post at various entry locations & Safety boards)
(Print these on jobsites. Graphics on SharePoint.)
Hygiene

Provide handwashing / sanitation options

- Employers should provide soap and running water wherever possible on job sites to permit frequent handwashing
- Alcohol-based sanitizers (greater than 60% ethanol or 70% isopropanol) should be provided as a backup, only in the event that providing supply of running water is impossible
- Employers should provide individual hand sanitizer bottles to workers, and position extra hand sanitizer in areas next to shared tools, equipment, and materials
- Employers should develop policies specifying that handwashing is required for all workers at the start of the shift, breaks, bathroom trips, lunch, team huddles, at the end of the shift, and after any close contact with someone displaying cough or cold symptoms
- Employers should post signage for hygiene (wash hands, cover cough, don't touch face)
Sanitation

Conduct more frequent cleaning

• Employers should fully disinfect work site areas and common surfaces prior to site reopen
• Employers should identify responsible for party for cleaning / sanitation by project site (e.g., one person/shift or every worker), and clearly communicate this to employees
• Employers should frequently clean and disinfect high touch surfaces on job sites
  – “High touch surfaces” will include shared tools, machines, vehicles and other equipment, handrails, doorknobs, etc. frequently, per CDC guidelines; for shared items like tools, wipe with disinfectant before being transferred
  – Employers should more frequently clean toilets and portable restrooms
• If feasible, employers should ensure optimal turnover of fresh/clean air on site if enclosed (e.g. bay and other doors/windows opened where feasible)

Provide cleaning materials and establish protocols

• Employers should provide disinfecting materials, EPA-approved for emerging viral pathogens
• Employers should create policies governing cleaning shared tools, vehicles, and inventory, among other items, and require disinfection at the beginning and end of individual usage
• Employers should provide time for employees to clean at the start and end of shifts
# Sanitation: Example

## Hygiene

### Illustrative

#### Pandemic Cleaning Protocols

<table>
<thead>
<tr>
<th>Field Area</th>
<th>Method</th>
<th>Frequency</th>
<th>Days</th>
<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Walls</strong></td>
<td>0.5% bleach, 1:10</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
<tr>
<td><strong>Doors</strong></td>
<td>70% isopropyl alcohol</td>
<td>Weekly</td>
<td>Office Staff</td>
<td></td>
</tr>
<tr>
<td><strong>Windows</strong></td>
<td>70% isopropyl alcohol</td>
<td>Weekly</td>
<td>Office Staff</td>
<td></td>
</tr>
<tr>
<td><strong>Surfaces</strong></td>
<td>0.5% bleach, 1:10</td>
<td>Weekly</td>
<td>Office Staff</td>
<td></td>
</tr>
<tr>
<td><strong>Sinks</strong></td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
</tbody>
</table>

#### Office Areas:

<table>
<thead>
<tr>
<th>Area</th>
<th>Method</th>
<th>Frequency</th>
<th>Days</th>
<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offices/Break Areas</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
<tr>
<td>Laundry Rooms</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
<tr>
<td>Restrooms</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
<tr>
<td>Common Areas</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
</tbody>
</table>

#### Kitchen Areas:

<table>
<thead>
<tr>
<th>Area</th>
<th>Method</th>
<th>Frequency</th>
<th>Days</th>
<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Microwaves</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
<tr>
<td>Refrigerators</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
<tr>
<td>Stoves</td>
<td>70% isopropyl alcohol</td>
<td>Daily</td>
<td>Every</td>
<td>10-10am</td>
</tr>
</tbody>
</table>
Enforce PPE use

- Employers should analyze and understand requirements (consistent with guidance and requirements issued by: Federal, state, county / municipal authorities, employers, owners)
- Employers should require face coverings for all employees on the site when indoors (provided by employer), with potential for a more stringent standard (e.g., N-95 masks for high risk exposure workers – be attentive to evolving public health guidance)
- Employers should require that employees use facial coverings before employees approach the facility entrance check point
- Employers should require that facial coverings be worn by all employees who cannot consistently maintain 6 ft of separation from other employees (provided by employer), as appropriate and dictated by activity

Distribute PPE

- Employers should consider establishing a mask pick-up location on site for those who need replacement (provide reason)
- Employers should record and track who has received their masks (e.g., weekly allotment for employees)
Ensure stocking

- Employers should confirm stock of facial coverings, face shields, gloves, and glasses on site and on order with lead time
- Employers should confirm that the operation has an adequate supply of additional health supplies (e.g., soap, disinfectant, hand sanitizer, paper towels and tissues)
- Employers should target no more than 30-day stock of critical supplies exists (e.g., sanitizer, masks) on site or on order with sufficient lead time, and avoid stockpiling

Provide guidance on PPE

- Employers should communicate guidance on PPE use while on the worksite, which may vary by employee
- Employers should train employees on the use of PPE (including storage, doffing and redressing facial covering), in addition to the protective triad of personal hygiene, social distancing and frequent disinfection
- Employers should permit voluntary individual use of masks in excess of guidelines
- In case of any conflict between any of foregoing guidance, the strictest measure should apply
PPE: example

Illustrative
Define protocols for symptomatic employees

- Employers should ensure that employees with symptoms (based on self assessment, screening etc.) are sent home.
- Employers should instruct that sick employees stay home in accordance with most recent Executive Orders.
- Employers should ensure protocols are visible in the facility (e.g., post signage to stay at home if specified symptoms occur).
- Employers should ensure isolation protocol and areas established to isolate symptomatic employees prior to sending to medical care or home to self-quarantine.
- Employers should identify and train Isolation Coordinator(s) for on-site assistance.
- Employers may also provide guidance where appropriate and support for employees (e.g., virtual training, etc.).
- Employers should check in periodically with employee on symptoms and work ability.
- Employer should report confirmed cases and outbreaks to state and local public health authorities, including any relevant information on circumstances of transmission and contacts of the infected worker.
Case monitoring

Provide guidance to exposed employees

• Employers should follow CDC response guidelines for exposure cases
• Employers should inform team members and relevant managers of their potential exposure when employee is sent home
• Employers should enact policies to encourage workers to stay home / leave worksite (e.g., temp paid sick leave) when feeling sick, or after close contact with a confirmed positive case
• Employers should trace close contacts of the infected worker within the workplace, for 3-7 days prior to onset of symptoms (based on where employee was and whether PPE was worn). See details on how to qualify “contact” on following page
• Communicate procedures with employees

Mark off and clean spaces identified in workplace tracing

• Employer should clean appropriate areas based on tracing procedures and CDC recommendations whenever a person has been sent home for symptoms
• Employer should perform a site area deep cleaning/disinfection (e.g., misting) as well as physical disinfection of common tools and surfaces whenever a COVID-19 person has been confirmed at the site
• If feasible, employer should consider leveraging a third-party cleaning service
Case monitoring

Define protocol for symptomatic employees

Mark off and clean spaces identified in tracing

Appendix B — Potential or Confirmed Case Action Plan

**Potential Incident Action Plan**

1. Identify cases, possible cases, or concern issues.
2. Review case management reports and follow-up in a timely manner.
3. Review the Incident Action Plan and determine the appropriate response.
4. Notify the appropriate authorities.
5. Implement containment measures.
6. Conduct contact tracing.
7. Implement quarantine and isolation measures.
8. Follow up with affected individuals.
9. Implement additional mitigation measures, as necessary.

If there is a case of COVID-19 on the job site, it is essential to
Stay Calm and follow the steps outlined below

- **Infection Assessment:**
  - Identify all cases and potential cases.
  - Contact tracing.
  - Isolation and quarantine.
  - Notify health authorities.
  - Clean and disinfect.

- **Protocol:**
  - Wearing masks.
  - Social distancing.
  - Hand hygiene.
  - Regular cleaning and disinfection.

- **Reporting:**
  - Notify the health department.
  - Notify the employer.
  - Notify the employee.

- **Mitigation:**
  - Implement additional mitigation measures, as necessary.
  - Review and update the Incident Action Plan.

- **Evaluation:**
  - Review the effectiveness of the Incident Action Plan.
  - Adjust and improve as necessary.

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- **Stop Work and Evacuate the office/space occupied by the person(s) who was confirmed positive with COVID-19:**
  - The size of the area to be evacuated will depend on the circumstances and judgement of the incident commander in coordination with the VP of HSE and project executive.
  - Common areas, including meeting rooms, shared equipment (e.g., copiers/printers), restrooms, kitchenettes, should be evaluated.
  - Maintain social distancing during evacuation procedure.
  - Restrict access to the identified affected areas.
  - Smaller areas or rooms: cordon off for cleaning and disinfecting. See cleaning guidelines below.
  - Larger areas: cordon off/ isolate the areas the person occupied and any high-touch surfaces the person may have come into contact with (and anything within 6 feet of those items)
  - Increase ventilation in larger areas by opening windows/doors and improving airflow if possible. If there is little to no airflow, treat it as a smaller area or room, as described above.
Facility closure

Enforce appropriate shutdown / cleaning protocols

- Employers should establish site specific response plan for confirmed cases (e.g., investigate, formulate response and cleaning procedures); if a worker goes home from the site with symptoms disinfect the area, supplies, and tools that person worked with immediately.

- Employers should shut down appropriate locations on the site down for deep cleaning (enforce appropriate amount of shutdown time) if there was a confirmed positive case.

Communicate exposure to employees

- Employers should conduct workplace contact tracing investigation for confirmed cases and notify those contacted or suspected of being in contact (e.g., notify contractual upstream entity: if subcontractor, notify Contractor; if Contractor, notify Owner).

- Employers should ensure appropriate documentation of positive cases for necessary parties (labor union, health services, health insurance), and record confirmed cases.

- Employers should ensure employees who were potentially exposed to a positive case on site to monitor symptoms closely and stay home if there was a high risk of exposure or symptoms occur (while maintaining employee privacy).