**Sample Plan for COVID-19**

**Exposure Prevention, Preparedness, and Response**

***Developed by Construction Industry Safety Coalition (CISC)***[[1]](#footnote-1) ***March 25, 2020***

***Revised by The Associated General Contractors of America (AGC) March 31, 2020***

***Revised by Nevada Contractors Association’s (NCA) Safety Committee September 14th, 2020***

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Every place of employment is different. What is feasible and appropriate for any oneplace of employment depends on its size, location and other unique characteristics. To help employers develop a sound approach, the NCA is pleased to make this sample plan available. Neither the association nor its individual members intend this document to be a definitive statement of the protocols and procedures that are applicable to each place of employment. Nor are they endeavoring to provide legal or other professional advice. This document should NOT be construed as legal advice or any other expression of the scope or nature of an employer’s legal obligation to provide employment and a safe place of employment to its employees, particularly under the unprecedented circumstances that the COVID-19 outbreak has created. In addition, new and better information could well supersede the information included in this document. As the situation evolves, employers should continue to monitor the environment in which they are working and related developments and react accordingly.

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 **[Name of Company]**  (hereinafter “Company”) takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, the Company must remain vigilant in mitigating the outbreak. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout the Company. The Company has also identified a team of employees to monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available, which includes the following people; \_\_\_\_\_\_\_\_\_\_\_\_\_**[Names of Assigned Employees]** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

This Plan is based on information available from the CDC and OSHA at the time of its development and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

**I. Responsibilities of Managers and Supervisors**

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and company safety practices to prevent the spread of the virus. Managers and supervisors are responsible for training employees on this plan and must encourage this same behavior from all employees.

**II. Responsibilities of Employees**

While at work, every employee is strictly required to abide by our prevention efforts. To minimize the spread of COVID-19 at our Company, everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our company. All employees must follow these, at all times. In addition, employees are expected to report to their managers or supervisors 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 ask your manager or supervisor. Title of Manager or Supervisor: **\_\_\_\_\_\_\_\_\_\_\_\_\_[Name of Manager/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; and
* Chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and 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.

**III. Protective Measures**

The Company has instituted the following protective measures.

A. General Safety Policies and Rules

* Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave.
* Safety meetings will be by telephone and online platforms, if possible. If safety meetings are conducted in-person, attendance will be collected verbally, and the supervisor/manager will sign-in each attendee. During any in-person safety meetings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.
* Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors) to increase personal space to at least six (6) feet, where possible. Practice social distancing in enclosed or limited spaced areas such as jobsite trailers, offices, restrooms, etc.
* All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone or online platforms.
* Employees will be encouraged to stagger breaks and lunches, if practical, to reduce the size of any group at any one time to less than 10 people.
* The Company will provide alcohol-based hand sanitizers and/or wipes if running water is not available.
* Employees should limit the use of shared 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. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
* The Company will split crews/staff into groups where possible to continue working effectively and limit employee exposure.
* Employees are encouraged to minimize ride-sharing. During work hours, while in company vehicles, employees must ensure adequate ventilation and wear face coverings.
* In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

* 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. Workers should wash or sanitize hands immediately before starting and after completing the work.
* The number of visitors will be limited to only those necessary for the work.
* Deliveries will be permitted but should be properly coordinated in line with this plan. Delivery personnel should remain in their vehicles if possible.
* Employees must be screened regarding COVID-19 symptoms in advance of starting work. Please see a sample employee questionnaire listed as Appendix A.

**[*Additional Jobsite Safety Precautions Include:*  Additional Precautions that May be Appropriate for Specific Companies, Business Operations or Projects ].**

B. Personal Protective Equipment and Work Practice Controls

* In addition to regular PPE for workers engaged in various tasks, the Company will also provide:
	+ Gloves: Gloves should be worn at all times while on-site. 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 must not share gloves.
	+ Eye protection: Eye protection must be worn at all times while on-site.
* Due to the current shortage of N95 respirators, the following Work Practice Controls should be followed:
	+ Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
	+ Limit exposure time to the extent practicable.
	+ Isolate workers in dusty operations by using a containment structure or distance to limit dust exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.
* Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

**IV. Cleaning and Disinfecting**

The Company has instituted regular housekeeping practices, which include cleaning and disinfecting of tools, equipment, and work areas. Employees must regularly do the same in their assigned work areas.

* Jobsite trailers, offices 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.
* Any trash collected from the jobsite must be changed frequently.
* Any portable jobsite toilets should be cleaned and disinfected by the leasing company at least twice per week. The Company will provide hand wash stations, and/or hand sanitizer. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.
* Vehicles, equipment and tools must be cleaned at least once per day and before change in operator or rider.
* Employees are to be removed from the specific work area when an individual(s) is confirmed-positive for COVID-19. Employees are not to return to that work area, until the area has been properly cleaned and sanitized.
* 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.

**[*Additional Cleaning and Disinfection Guidelines Include:* Additional Cleaning Requirements that May be Appropriate if Hazardous Materials are Used Onsite ].**

**V. 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 24 hours (1 full day) 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 24 hours (1 full day).

* **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 24 hours (1 full day) have passed since recovery;[[2]](#footnote-2) 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 less than six (6) feet for at least 15 minutes.

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.

**VI. OSHA Recordkeeping**

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recording and reporting under OSHA’s recordkeeping rule. OSHA requires construction employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

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 recording analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, the Company will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would *not* be work-related, and thus not recordable.

The Company’s assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident.

**VII. 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.

**VIII. 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**\_\_\_\_\_\_\_\_\_\_\_\_\_(Title of designated individual)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Sample Employee COVID-19 Questionnaire**

|  |  |
| --- | --- |
| **Name of Employee:** | **Date:** |
| **Name of Employer:** | **Employee Phone Number:** |

|  |  |
| --- | --- |
| YES | NO |

1. Have you been diagnosed with the COVID-19 virus?
2. Have you been in close contact with anyone who has been diagnosed with the COVID-19 virus?

|  |  |
| --- | --- |
| YES | NO |

|  |  |
| --- | --- |
| YES | NO |

1. Do you have a fever of 100.4 or above?

If you answered YES to any of the questions above, you must NOT enter the job site and must immediately notify our Supervisor for further instructions. It is recommended by the CDC that you self-quarantine and seek medical help immediately if you experience any other symptoms.

Are you experiencing any of the following symptoms?

1. Body or muscle aches, chills, fatigue
2. Shortness of breath or difficulty breathing
3. Sore throat or coughing
4. Vomiting or diarrhea
5. New loss of taste or smell

|  |  |
| --- | --- |
| YES | NO |

If you are experiencing any of these symptoms, it is recommended by the CDC that you self-quarantine.

If you meet any of the following conditions you may be at a greater risk of severe illness from COVID-19:

1. Elderly (over 65 years of age)
2. Chronic health conditions, i.e. diabetic, heart disease, lung disease, etc.
3. Live with or care for someone who is or may have been exposed to COVID-19

|  |
| --- |
|  **Employee Signature:** |

The Center for Disease and Prevention recommends: Employee who have symptoms of acute respiratory illness are recommended to stay home and not come to work until they are free of fever (100.4F [37.8C] or greater using an oral thermometer), signs of fever and any other symptoms for at least 24 hours, without the use of a fever reducing or other symptom-altering medicines (i.e. cough suppressants). Employees should notify their supervisor and stay home if they are sick.

**For On-Site Health and Safety Use Only**

Temperature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Return to Work: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Technician initials: \_\_\_\_\_\_\_\_\_\_\_\_ See Supervisor: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. The CISC is comprised of over 25 construction industry trade associations representing all aspects of the construction industry. The CISC was formed to provide information to the Occupational Safety and Health Administration and contractors on important safety and health issues. This document is a “template” that individual contractors should review carefully and tailor to their own work and jobsites. [↑](#footnote-ref-1)
2. 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). [↑](#footnote-ref-2)