



Safety Coalition Recommendations: COVID-19 Exposure Prevention, Preparedness, and Response Plan for Construction

The purpose of this plan is to outline the steps that every employer and employee can take to reduce the risk of exposure to COVID-19. The plan describes how to prevent worker exposure to coronavirus, protective measures to be taken at the Greater Michigan Construction Academy (GMCA), personal protective equipment and work practice controls to be used, cleaning and disinfecting procedures, and what to do if a worker becomes sick.¹

The Greater Michigan Construction Academy (GMCA) 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, we all must remain vigilant in mitigating the outbreak. This is particularly true for the construction industry, which has been deemed “essential” during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented throughout the Company. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA, 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.

¹ This template COVID-19 Exposure Prevention, Preparedness, and Response Plan for Construction has been developed by the Construction Industry Safety Coalition (“CISC”). 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 companies should review carefully and tailor to their needs. It does not constitute legal advice and should not be construed on its own as fulfilling a contractor’s overall obligations to ensure a safe and healthful work environment. This template was prepared on March 25, 2020. As the COVID-19 outbreak develops, the information and recommendations contained in this document may change and thus, contractors should continue to monitor developments in this area.

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 workplace safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

II. Responsibilities of Employees

We are asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19, we all must play our part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our workplace. All employees must follow these. 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 the GMCA President or Vice President. If they cannot answer the question, please contact the Director of Operations.

OSHA and the CDC have provided the following control and preventative guidance to 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:

- Coughing;
- Fever;

- Shortness of breath, difficulty breathing; and
- Early symptoms such as 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 healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

III. Protective Measures

The Company has instituted the following protective measures.

A. General Safety Policies and Rules

- Any employee/student/visitor showing symptoms of COVID-19 will be asked to leave and return home.
- Each employee will take their temperature before they start their shift.
- Gloves and mask will be provided.
- Employees must avoid physical contact with others and direct employees/students/visitors to increase personal space to at least six (6) feet, where possible.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone/zoom.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- Employees should limit the use of co-workers' office equipment or personal items. The Company will provide alcohol-based wipes to clean office equipment before and after use. When cleaning equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Employees are encouraged to minimize ride-sharing. While in vehicle, employees must ensure adequate ventilation.

- In lieu of using a common source of drinking water, employees should use individual water bottles.

B. Workers entering Occupied Building

- When employees enter, office buildings, and other establishments, these locations present unique hazards with regards to COVID-19 exposures. All employees should evaluate the specific hazards when determining best practices related to COVID-19.
- Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Employees should wash or sanitize hands immediately before and after each encounter.

C. Work Place Visitors

- The number of visitors will be limited to only those that are necessary.
- All visitors will be screened in advance of arriving. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to enter the workplace:
 - Have you been confirmed positive for COVID-19?
 - Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
 - Have you been in close contact with any persons who has been confirmed positive for COVID-19?
 - Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- Deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

IV. Cleaning and Disinfecting

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

- 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 workplace must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- If an employee has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, the Company will clean those areas of the workplace that a confirmed-positive individual may have come into contact with 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 (these can be used if appropriate for the surface).
- The Company will maintain Safety Data Sheets of all disinfectants used on site.

V. Exposure Situations

- **Employee Exhibiting 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 that reports to work with symptoms to return home until they are 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 or provide a negative COVID test result. Anyone from the office that was in contact with the employee who is showing symptoms will be notified as well so they can limit their exposure until COVID test results are received.

- **Employee Tests Positive for COVID-19**

An employee that 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 seven (7) days have passed since the date of his or her first positive test, and have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;² and (2) at least seven (7) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Company will require an employee to provide documentation clearing their return to work.

- **Employee Has Close Contact with a Tested Positive COVID-19 Individual**

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to self-quarantine for 14 days from the last date of close contact with the carrier. 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 into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier. 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 the President or Vice

² Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

President of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

VI. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA’s recordkeeping rule. OSHA requires 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 not a confirmed diagnosis), the recordability analysis would not necessarily be 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, 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 occurring.

VII. “Essential” Industry

Several States and localities are issuing orders that prohibit work and travel, except for essential businesses. If you have been deemed essential you will be provided a letter that you can show the authorities indicating that you are employed an “essential” and are commuting to and from work.

VIII. 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 of an employee’s condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. The Company reserves the right to inform other employees that a co-worker (without disclosing the person’s name) 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.

IX. 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 GMCA President Stephanie Davis.

Essential Industry Employee

Re: Shelter-in-Place Orders

To whom it may concern:

Please be informed that the bearer of this letter is employed at the Greater Michigan Construction Academy located at 7730 W. Wackerly St Midland MI. 48642. We have reviewed all applicable Orders and have determined that our operations qualify as essential/critical infrastructure and that we are able to continue to operate under those Orders.

Employees in possession of this letter have been deemed essential to the minimum basic operations of our business. All non-essential personnel have been notified to work remotely until further notice. Employees who are critical to the minimum basic operations of the business have been instructed to comply with social distancing rules/requirements in the jurisdiction, as well as other safety and health precautions.

If you have questions regarding the nature or scope of this letter, please do not hesitate to contact Stephanie Davis at 989-225-4674.

Sincerely,

Stephanie Davis
President

Employee Notification

DATE: [DATE]

TO: [CLOSE CONTACT EMPLOYEE]

FROM: [COMPANY REP]

We have been informed by one of our [employees/customer/vendor/etc] working at GMCA 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/etc] has been directed to self-quarantine until permitted to return to work.

We are alerting you to this development because, based on the Company’s investigation, we believe that you may have come into contact with the confirmed-positive case, on or about [DATE]. Based on Company policy we are directing you not to report to work (i.e., self-quarantine) until, at least, [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 Stephanie Davis 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 environment for all of 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 remind you that one of our core values as a company is respect for and among our employees [or customers]. We will treat information regarding the identity of employees [or customers] with suspected or confirmed cases of COVID-19 as confidential to the extent practicable and will comply with applicable laws regarding the handling of such information. Further, per Company policy, we will not tolerate harassment of, or discrimination or retaliation against, employees [or anyone].

Please contact Stephanie Davis at 989-225-4674 if you have any questions or concerns.

For more information about COVID-19, please visit the CDC website at: <http://www.cdc.gov/coronavirus/2019-ncov/index.html>

COVID-19 Checklist for Employers and Employees

Know the Symptoms of COVID-19

- Coughing, fever, shortness of breath, and difficulty breathing.
- Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, DO NOT GO TO WORK and call your health-care provider immediately. Do the same thing if you come into close contact with someone showing these symptoms.

Employer Responsibilities

- Develop a COVID-19 Exposure Action Plan.
- Conduct safety meetings (toolbox talks) by phone if possible. If not, instruct employees to maintain 6-feet between each other. Attendance will be tracked verbally rather than having employees sign an attendance sheet.
- All visitors will be pre-screened to ensure they are not exhibiting symptoms.
- Employees, and visitors will be asked to leave and return home if they are showing symptoms.
- Provide hand sanitizer and maintain Safety Data Sheets of all disinfectants used on site.
- Provide protective equipment (PPE) to any employees assigned cleaning/disinfecting tasks.
- Talk with business partners about your response plans. Share best practices with other businesses in your communities (especially those in your supply chain), chambers of commerce, and associations to improve community response efforts.

Employee Responsibilities

- Become familiar with the Exposure Action Plan and follow all elements of the Plan.
- Practice good hygiene: wash hands with soap and water for at least 20 seconds. If these are not available, use alcohol-based hand rub with at least 60% alcohol. Avoid touching your face, eyes, food, etc. with unwashed hands.

Cleaning/Disinfecting workplace and Other Protective Measures

- Clean and disinfect frequently used office equipment on a regular basis. This includes other elements of the workplace where possible. Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, office equipment, etc.) on a regular basis.
- Trash collected from the workplace must be changed frequently by someone wearing gloves.

Personal Protective Equipment and Alternate Work Practice Controls

- Provide and wear the proper PPE.

COVID-19 Toolbox Talk

What is COVID-19?

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

According to the U.S. Department of Health and Human Services/Centers for Disease Control and Prevention (“CDC”), Chinese authorities identified an outbreak caused by a novel—or new—coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in Wuhan, Hubei Province, China, and has spread to a growing number of other countries—including the United States.

How is COVID-19 Spread?

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly *via* respiratory droplets produced when an infected person coughs or sneezes, like how influenza and other respiratory pathogens spread. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes.

In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties.

Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.

There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

COVID-19 Prevention and Work Practice Controls:

Worker Responsibilities

- 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. Always wash hands that are visibly soiled.
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Avoid close contact with people who are sick.
- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home—DO NOT GO TO WORK.
- Sick employees should follow [CDC-recommended steps](#). Employees should not return to work until the criteria to [discontinue home isolation](#) are met, in consultation with healthcare providers and state and local health departments.

General Workplace / Office Practices

- Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use [products that meet EPA's criteria for use against SARS-CoV-2external icon](#), the cause of COVID-19, and are appropriate for the surface.
- Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Clean and disinfect frequently used tools and equipment on a regular basis.
 - This includes other elements of the workplace where possible.
 - Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as bathrooms, break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, office equipment, etc.) on a regular basis.
- Any trash collected from the workplace must be changed frequently by someone wearing gloves.
- In addition to regular PPE for workers engaged in various tasks employers will also provide:
 - Gloves: Gloves will be provided. 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. Gloves should not be shared if at all possible.