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 WORK, WORK PRACTICE CONTROLS TO BE USED, CLEANING AND DISINFECTING PROCEDURES, AND WHAT TO DO IF A WORKER BECOMES SICK.1

[INSERT COMPANY NAME] 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 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.

* **Responsibilities of Managers and Supervisors**

1. This template COVID-19 Exposure Prevention, Preparedness, and Response Plan is a “template” that individual companies should review carefully and tailor to their own work and job sites. 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 May 14, 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.

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

* **Responsibilities of Employees**

We are asking every one of our employees to help our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsite, we all must play our part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our job sites. 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 your manager or supervisor. If they cannot answer the question, please contact [ADD TITLE HERE].

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 rub with at least 60% alcohol.
* Avoid touching 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.

* **Job Site Protective Measures**

The Company has instituted the following protective measures at all job sites:

* ***General Safety Policies and Rules***
* Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
* Safety meetings will be by telephone, if possible. If safety meetings are conducted in-person, attendance will be collected verbally and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. 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 direct employees/contractors/ visitors to increase personal space to at least six (6) feet, where possible.
* All unnecessary in-person meetings will be eliminated. To the extent possible, business-critical meetings will be conducted by telephone.
* 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-worker’s materials such as office supplies, clip boards, whiteboards, etc. To the extent materials can 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 minimize ride-sharing. While in a vehicle, employees must ensure adequate ventilation.
* In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.
* INSERT ADDITIONAL PRECAUTIONS THAT MAY BE SPECIFIC TO YOUR BUSINESS/ OPERATIONS/PROJECTS.
* ***Workers Entering Buildings***
* 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.
* ***Job Site Visitors***
* The number of visitors to the job site will be limited to only those necessary for the work.
* All visitors will be screened in advance of arriving at the job site. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access the jobsite:
* 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 have 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?
* Site 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.
* ***Job Site Cleaning and Disinfecting***

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

* Jobsite, break/lunchroom, and any other shared 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 by someone wearing nitrile, latex, or vinyl gloves.
* If an employee has tested positive for COVID-19, the Company will clean those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that workspace 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.
* INSERT ADDITIONAL CLEANING REQUIREMENTS IF YOU USE HAZARDOUS CHEMICALS ON SITE.

***V. Job Site 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 hour (3 full days). To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

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

An employee 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; 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 a manager or supervisor of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

***V. 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 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 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 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.

***V. 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.