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CONSTRUCTION  
PRACTICE GROUP



# SPECIAL COVID-19 UPDATE

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## ARE YOUR CONSTRUCTION SITES PREPARED TO OPERATE IN A TIME WITH COVID-19?

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As stay-at-home orders are lifted and operations resume, businesses must prepare to operate in a world where COVID-19 exists. In preparation for the return of the workforce, measures must be put in place to protect workers from becoming infected. Contractors must also decide on how they are going to address the various additional challenges resulting from the current situation.

The following is meant to assist you in your preparation. It must be noted that this is not a comprehensive list but rather a prompt for further ideas. Should you have any questions or would like further assistance, please do not hesitate to reach out to your King & Neel team, and we will be happy to assist you.

For those with operations in Washington state, the governor and Department of Labor and Industries Division of Occupational Safety and Health have created the following documents that mandate minimum requirements with which all contractors must comply.

**Phase 1 Construction Restart –  
[COVID-19 Job Site Requirements](#)**

**General Coronavirus Prevention Under Stay Home –  
[Stay Healthy Order](#)**

## IMPLEMENTING A WRITTEN PLAN TO PREVENT THE INTRODUCTION AND SPREAD OF COVID-19

### Education

- Does your plan educate workers (and customers/visitors) about COVID-19 and how to prevent the spread of the virus?
- Do you have posters or other informational material about COVID-19 ready to be posted at jobsite entrances, break areas, restrooms, and other commonly occupied or traveled locations?
- Have you provided training in accordance with your Hazard Communication program for all cleaning and disinfection products you will use?
- Have you already prepared materials to inform your workers about your plan?

### Social Distancing

- Does your plan require all individuals to avoid close contact and always maintain a distance of at least 6 feet between each other?
- Does your plan discourage carpooling?
- Where work must be conducted within the minimum 6-foot separation distance, can you erect physical barriers?

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- ☑ Are you able to use split shifts to lessen the number of personnel onsite at any given time?
- ☑ Will you restrict access to jobsite trailers to only authorized individuals?
- ☑ Can you transport materials that normally would require team lifting using mechanical means?

### Cleaning and Disinfection

[www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html](http://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html)

- ☑ Does your plan require regularly cleaning the jobsite and frequently cleaning commonly touched surfaces?
- ☑ Have you created standard procedures for cleaning to be done in a uniform manner?
- ☑ Does your plan for cleaning and disinfection follow [CDC recommendations](#)?
- ☑ Have you reviewed the [EPA's registered SARS-CoV-2 disinfectant list](#) to decide what chemicals to use?
- ☑ Do you have a posted cleaning schedule?
- ☑ Do you have a list identifying commonly touched surfaces posted around the jobsite?
- ☑ Have you considered covering difficult-to-clean commonly touched surfaces with a covering made of an easily cleaned material?
- ☑ Do you have a plan to make cleaning materials readily available to workers for spot cleaning when necessary?
- ☑ Hazard Communication considerations  
[www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200](http://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200)
  - » Have you provided training in accordance with your Hazard Communication program for all cleaning and disinfection products you will use?
  - » Have you obtained safety data sheets (SDS) for all cleaning and disinfection products you have purchased?

- » Are you labeling any secondary containers in accordance with the Hazard Communication Standard?
- » For each chemical you will be using, have you provided training on its proper use per the manufacturer's instructions?

### Personal Hygiene and Respiratory Etiquette

- ☑ Do you have facilities for frequent hand washing readily available?
- ☑ Where hand-washing facilities are infeasible, are you providing an alcohol-based hand sanitizer that is made up of at least 60% alcohol?
- ☑ Has your training for COVID-19 included good respiratory (cough and sneeze) etiquette?
- ☑ Have you acquired tissues and no-touch disposal receptacles?

### Sick or Potentially Exposed Individuals

- ☑ Does your plan include procedures on how to deal with sick employees?
- ☑ Are you prepared to conduct active screening of each person entering the jobsite?
- ☑ Will your screening include written assessment forms, or will you conduct it verbally or using signage?
- ☑ Have you worked with your human resources department to ensure your screening procedures are following the [Equal Employment Opportunity Commission's guidelines](#)?
- ☑ Does your plan have protocols for what to do if an employee has entered the jobsite and reports, or is recognized, to be sick?
- ☑ Have you established procedures to separate from the other workers and immediately send home any worker who reports, or is recognized, to be sick after entering the jobsite?

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- ☑ Do you have procedures in place for cleaning and sanitizing any areas that a sick or suspected sick employee has contacted after entering the jobsite?
- ☑ Does your post-employee-illness procedure include conducting a quick investigation to ensure that the sick or suspected sick employee has followed your minimum 6-foot social distancing policy and had no close contact with other employees?
- ☑ Has your human resources department reviewed all your protocols concerning the handling of sick or suspected sick individuals to ensure they comply with all applicable regulatory requirements?

#### Personal Protective Equipment (PPE)

- ☑ Have you made any changes to your required PPE in response to COVID-19, such as requiring 100% eye protection or eliminating sharing PPE if your safety program allowed for shared use previously?
- ☑ Have you conducted an evaluation to determine if engineering controls could be used in place of respiratory protection?
- ☑ Are you going to require the use of cloth face coverings?
- ☑ If you are requiring cloth face coverings, have you reviewed the [CDC recommendations on use](#)?

#### Hydration

- ☑ Have you removed or made inaccessible all shared water coolers, jugs, fountains, etc. on the jobsite?
- ☑ Have you encouraged all employees to bring personal water containers of sufficient quantity?
- ☑ Are you providing bottled water to employees onsite?
- ☑ Are you requiring employees to label their water bottles to prevent sharing?

#### ADDITIONAL CHALLENGES TO CONSIDER

##### Getting Workers Back to the Jobsite After Shutdown

- ☑ Do you plan to provide accommodation for workers with children who are now home, while childcare is unavailable?

- ☑ Are you considering workers caring for elderly relatives who now have no care during the daytime hours?
- ☑ Will you have workers who can work from home continue to do so?

#### Work hardening

- ☑ With employees having been away from work for an extended period, are you taking measures to re-acclimate workers to the workplace to prevent overexertion?
- ☑ Have you considered taking advantage of the frequent breaks during the work hardening process to conduct light cleaning tasks?

#### Heat stress

- ☑ As we are moving towards warmer weather have you implemented proactive measures to prevent heat stress?
- ☑ Do you plan to re-train workers on heat stress as they return to work?
- ☑ Are you encouraging workers to stay hydrated?
- ☑ Are you scheduling frequent rest periods where workers can seek cooler areas?
- ☑ Are workers encouraged to immediately report to a supervisor if they recognize the symptoms of heat stress in themselves or others?

#### Variations

- ☑ If you are going to split shifts, do you need to acquire any additional permissions or specific variances to work outside of normal working hours?
- ☑ Will you require any further permits or permissions for road closures?

#### Employee travel

- ☑ As people start traveling again, are there any special protocols that you plan to initiate regarding work and non-work-related travel?

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As things are rapidly changing, we recommend that you check the free updates and resources available from your state's Associated General Contractors of America COVID-19- website or the national website daily.

- **AGC Alaska:** [www.agcak.org/covid-19-outbreak.html](http://www.agcak.org/covid-19-outbreak.html)
- **AGC California:** [www.agc-ca.org/covid19/](http://www.agc-ca.org/covid19/)
- **AGC Oregon:** [www.agc-oregon.org/](http://www.agc-oregon.org/)
- **AGC Washington:** [www.agcwa.com/covid-19-updates/](http://www.agcwa.com/covid-19-updates/)
- **AGC Colorado:** [www.agccolorado.org/keep-construction-open](http://www.agccolorado.org/keep-construction-open)
- **GCA of Hawaii:** [www.gcahawaii.org/covid-19](http://www.gcahawaii.org/covid-19)
- **AGC National:** [www.agc.org/coronavirus](http://www.agc.org/coronavirus)

As work resumes and we settle back into a normal rhythm, we must remain vigilant and continue to take as many proactive measures as possible to prevent the

introduction and spread of COVID-19 in our workplaces. We must also remember that until there is a vaccine and successful treatment for COVID-19, we are only a few bad days from another shutdown. In these uncertain times, we must do everything we can to look out for one another; it is a time for the sharing of information and collaborating with advisors and peers to develop the most robust program possible to protect loved ones, neighbors, strangers, and ourselves.

Again, if you have any questions or would like further assistance, reach out to your King & Neel team, who will be happy to assist you.

Stay safe!

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