



Protecting Worker Health

Returning to Work: Construction Environment

Guidance Document

[aiha.org](https://www.aiha.org)

Overview

According to the Cybersecurity and Infrastructure Security Agency (CISA), much of the construction industry has been identified as critical infrastructure and essential business. According to CISA, these are sectors “whose assets, systems, and networks, whether physical or virtual, are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, national public health or safety, or any combination thereof”. The construction industry serves as the backbone for many supply chains, construction, and specialty contracting organizations and have adapted rapidly to the changing health and safety challenges that SARS-CoV-2 and COVID-19 have introduced.

Construction firms have taken risk management frameworks used to control high risk work activities and shifted that same mindset and framework to the health-related risks of COVID-19. Even though construction markets remained somewhat open under critical infrastructure, construction projects have implemented unique solutions in order to adapt and manage worker health for return to work as well as managing schedules with an impacted workforce.

With stay at home and shelter in place restrictions beginning to lift, construction companies are faced with difficult questions that must be addressed as they transition back to normal operations, such as:

- How can we protect our employees, third-parties, and projects from the disease?
- How can we minimize the risk of disease transmission if those that are ill or those who have had contact with positive COVID-19 in our workforce?

What should an Employer do to protect themselves and their workers?

Construction companies and vendors should continually monitor global (World Health Organization WHO), federal (CDC), state, and local guidelines for changes in recommendations, disinfection strategies, worker protections and other best management practices.

Employers should also consider developing a team of professionals to monitor, assess, and implement new strategies as they become available. In addition, employers should consider the following strategies for reducing the risk of COVID-19 transmission in regards to physical distancing, ventilation, enhanced cleaning practices, restrooms, gathering areas and contact surfaces, personal hygiene, employee wellness, personal protective equipment (COVID related protective equipment should include face coverings/masks and/or face shields for close contact activities, regular work gloves) training, waste and laundering, and communication.

Tips to Return to Normal Business Operations:

- At minimum, follow the CDC Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers.
- Develop a response plan for communicating to your employees of the facts of SARS-CoV-2 virus and COVID-19 disease.
- Complete a task-based risk assessment / mapping of the project site to determine best strategies for social distancing of at least 6 feet, and ensure staff have face coverings.
- Reduce the number of individuals to the site to essential staff to complete the work. Temporary spaces (site/job trailers should be cleaned and disinfected daily).



- Do not let anyone symptomatic onto the worksite. Work with your health providers for support and guidance.
- Reduce tasks requiring large amounts of people to be in one area. Design work to reduce or eliminate trade stacking in the same area.
 - Consider limiting meetings to 10 people or less. Employees shall use virtual meeting tools, including phone, TEAMS, VTC or WebEx, in lieu of in-person meetings, whenever possible.
- Project teams shall clean and disinfect their shared workstations and equipment after use.
- Eliminate non-essential visits, such as job tours, vendor demos, etc.
- Maintain a daily approved visitor log. This log should include the date, time, and contact information of the visitor.
 - Ensure toolbox talks have adequate spacing and only have one person note who is in attendance.
- Stagger shifts and other trades to isolate and compartmentalize staff. This will allow protection of others if a breakout occurs and reduces / limits the number of people who are exposed. Having the same teams work together or travel together can limit the reach of a potential outbreak.
- Consider a 4-day work week to allow for 72 hours of downtime at the project site.
 - this allows for limited exposure to 4 days instead of 5 days.
 - CDC and recent studies have shown COVID-19 can stay active up to 3 days on surfaces.
- Stop employees from randomly walking floors, between floors, or buildings to reduce cross-contamination.
 - If your project build is complex and large, you may consider color code (stickers) on hard hats and restrict access to only the correct color for each building or space.
 - You may also want to color code T-shirts for easy recognition in a space.
- Provide for several hand washing stations with soap and water in common areas and throughout the site.
 - Portable wash stations.
 - Also provide hand sanitizer in vehicles and workstations
- Modify break areas to allow for social distancing. Stagger breaks to reduce people in break areas.
 - Picnic tables should be marked with “X”s to stop people from sitting close to each other.
 - Breakrooms should have chairs removed to stop any chance of gathering.
 - Janitorial staff should be disinfecting eating areas hourly.
- Eliminate sharing personal hand tools and large shared tools shall be cleaned before and after use.
- Reduce the number of people in a van or pool vehicle for commuting to and from the job site.
- Encourage staff to wash clothes daily and face coverings daily on the warmest setting possible.
- Monitor employees’ wellness. If they are not feeling well, stay home.
- Revisit your leave or sick program to allow for time off.
- Provide up-to-date information about COVID-19, SARS-CoV-2 and local, state and federal guidelines.
 - Have your human resources engage for health and wellness programs.
 - Provide additional information for employee and family use (i.e., EAP).
- If a positive COVID-19 case amongst the workforce is identified, quickly disinfect spaces the worker was at and complete contact tracing for anyone that may have come in contact with the employee.



Contact tracing and sharing of employee information should be done under the guidance of Human Resources due to privacy requirements of HIPAA and/or ADA.

- Employee who tests positive:
 - The employee shall be isolated to the area they are in currently.
 - Any individuals working with the employee shall also be isolated and all parties will follow social distancing rules.
 - The general contractor/client shall be notified.
 - Remove the employee who tested positive for a minimum of 14 days.
 - Follow primary care physician (PCP) instructions.
 - Follow CDC and health care guidance.
 - Follow CDC return-to-work protocol in conjunction with HR return-to-work process if applicable.
 - Employees who are ill with non-COVID-19 related symptoms (fever, cough, shortness of breath), shall be sent home for a minimum of 72 hours. Returning to work after 72-hours symptom free without aid of medication.
 - If you are experiencing COVID-19 related symptoms and/or have been exposed to someone who is COVID-19 positive, you must follow the CDC exposure protocol related to your job site (<https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>)
 - Cleaning and disinfecting should be done immediately by trained personnel and they must wear appropriate Personal Protective Equipment (PPE), including face coverings and dispose of gloves after use and wash hands and face when complete.
 - Visibly dirty surfaces shall be cleaned using a detergent or soap and water PRIOR to disinfection.
 - For disinfection, diluted household bleach solutions, alcohol solutions with at least 70 percent alcohol, and EPA-registered disinfectants on List-N should be effective. Recommended bleach solution mixture for cleaning (<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html>)
 - Consider wearable technology such as proximity devices worn on hard hats or wrist bands to monitor employee physical distancing and tracing of contacts.
 - PPE: for close contact activities that cannot adjust for physical distancing, consider providing enhanced PPE or a face shield with a face covering while fully considering all the potential OSHA requirements.
- NOTE: If an employer chooses to provide an N95 respirator, please fully consider all the potential OSHA requirements.**
- Employer Response to positive case:
 - Immediately isolate, clean/disinfect and contact trace the movement of the employee.
 - Trace 72 hours for cleaning of locations employee worked or in contact with.
 - Trace 48 hours prior to onset of symptoms for direct contact personnel had contact with the affected employee.
 - For transparency, each contractor should notify the client of the situation (involving your HR professional to ensure privacy requirements are followed and maintained).
 - Employer Human Resources engages to provide supportive care to worker and family.
 - Follow CDC guideline and exposure protocol for Critical Infrastructure Workers.
 - Communicate and reinforce with employees, while maintaining PII and HIPPA requirements, that they



may have been exposed and to closely monitor their health, temperature and current symptoms as identified by CDC.

- Provide employees with additional PPE and monitoring (at the company's discretion).
- Follow Critical Infrastructure Exposure Protocol
 - CDC interim guidance: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/critical-workers-implementing-safety-practices.pdf>
 - Best Management Practices Protocols: https://www.mcdean.com/2020/docs/MCD_Exposure_Protocol_20200429_v5.0-BilingualEN-SP.pdf

Screening and Temperature Check Tips for Employees

- Employees can take their temperature at home or have their temperature taken using an infrared camera and answer a medical questionnaire to evaluate their current physical state before entering any job site.
- Employees, who monitor their temperature at home, should update their supervisor if they have a temperature exceeding 100.4 degrees Fahrenheit.
- Any employee who has a temperature that exceeds 100.4 degrees Fahrenheit should not be able to access the job site until their temperature has broken for a minimum of 72 hours without medication.
- Per the medical questionnaire, any employee who answers “Yes” to any of the three questions will be sent to the secondary evaluation area, where the designated onsite nurse (if available) will assess and determine if they are allowed on the job site.
 - Example Medical Questionnaire.
 - Have you, or a person you have been in close contact with, been diagnosed with COVID-19 within the last 14 days? (Close contact is 6 feet or less for more than 10 minutes).
 - Have you experienced any cold or flu-like symptoms in the last 72 hours (to include fever, shortness of breath, cough, sore throat, or difficulty breathing)?
 - Have you traveled internationally or another hot spot (e.g., New York) in the last 14 days.
 - Infrared camera or thermal imaging camera can be used to take your temperature at the job site and allows for accurate information without the need to touch the employee.

What should an Employee do to protect themselves?

- Educate yourself with the facts of COVID-19.
 - Obtain your information about COVID-19 from credible sources.
- If you feel unwell or have any of the symptoms associated with COVID-19, stay home. **NOTE: Employer HR Policies, HIPPA guidelines and other laws should be followed at all times.**
 - Self-monitor your temperature every morning.
- Understand the rules within the workspace – no large gatherings.
- At all times, wear a face covering or something better if you have it. Maintain your face covering and use it if you are not able to maintain 6 feet distance.
- Let your employer know if you have concerns about the PPE that may be provided to you and that you are properly instructed on how to use it.
- Maintain good hygiene practices (washing hands with soap and water) or a hand sanitizer with at least 60% alcohol Link (<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html>).
- Meetings should not be in person, but use video, chats, or other conference line-type systems.
- Weekly toolbox talks should be virtual or in smaller groups. All hands meetings shall be reduced.



- If you test positive:
 - Stay home and isolate yourself.
 - Contact your supervisor and advise them of your results.
- Identify to them if you were commuting with others.
- Tell them who you had come in contact with or shared tools or workspaces with at least 48 hours prior to the onset of symptoms.
- Returning back to work, employee should at minimum follow most recent CDC guidelines (<https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>).

What can a Customer/Client do to minimize the transmission of COVID-19?

- Customers and visitors to the job site should follow the same practices of social distancing.
- Use a face covering when entering the job site and inspecting or meeting with workers.
- No handshake greetings.
- Do not share clipboards, but rather use a white board to demonstrate the concept in the field.
- If you are symptomatic – do not visit the site and stay home.
- Increased use of virtual technology for project tracking and updates to reduce visitors and support such as engineers and inspectors from visiting the project but accomplish project reviews.

Resources

- **AGC: The Construction Association – Proactive Measures for Addressing COVID-19 / Pre-Screening Questionnaire** https://www.agc.org/sites/default/files/Files/Safety%20%26%20Health/AGC%20COVID-19%20Questionnaire%20and%20Tips_03.26.2020_0.pdf
- **AGC: The Construction Association - COVID-19 Recommended Practices for Construction Job-sites** <https://www.agc.org/sites/default/files/Files/Safety%20%26%20Health/COVID19%20Recommended%20Practices%20031920.pdf>
- **Cybersecurity and Infrastructure Security Agency CISA resource on Critical Infrastructure Workers**
- Numerous **wellness questionnaire examples** are available online (e.g., https://doh.sd.gov/documents/COVID19/BusinessScreening_Q&A.pdf)
- The EPA has developed a list of disinfectants for use against SARS-CoV-2: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
- **American Society of Heating, Refrigeration, Air-conditioning Engineers ASHRAE COVID 19 resource for ventilation**
- **CDC Interim Critical Infrastructure Guidelines**
- **EPA-Registered Approved Disinfectant List N.**
- AIHA's Indoor Environmental Quality Committee developed these guidance documents about reopening and cleaning buildings after closures due to COVID-19: https://aiha-assets.sfo2.digitaloceanspaces.com/AIHA/resources/Public-Resources/RecoveringFromCOVID-19BuildingClosures_GuidanceDocument.FINAL.pdf and https://aiha-assets.sfo2.digitaloceanspaces.com/AIHA/resources/Guidance-Documents/Workplace-Cleaning-for-COVID-19-Guidance-Documents_FINAL.pdf
- American Cleaning Institute's COVID-19 Resources <https://www.cleaninginstitute.org/coronavirus>



AIHA®

Founded in 1939, the American Industrial Hygiene Association® (AIHA®) is one of the largest international associations serving the needs of industrial/occupational hygiene professionals practicing in industry, government, labor, academic institutions, and independent organizations. For more information, visit www.aiha.org

About Occupational Health and Safety Professionals

Occupational health and safety (OHS) professionals (also known as industrial hygienists) practice the science of anticipating, recognizing, evaluating,

and controlling workplace conditions that may cause workers' injury or illness. Through a continuous improvement cycle of planning, doing, checking and acting, OHS professionals make sure workplaces are healthy and safe.

Get additional resources at AIHA's Coronavirus Outbreak Resource Center.

https://www.aiha.org/public-resources/consumer-resources/coronavirus_outbreak_resources

Find a qualified industrial hygiene and OEHS professionals near you in our Consultants Listing. <https://www.aiha.org/consultants-directory>.



| [backtoworksafely.org](https://www.backtoworksafely.org)

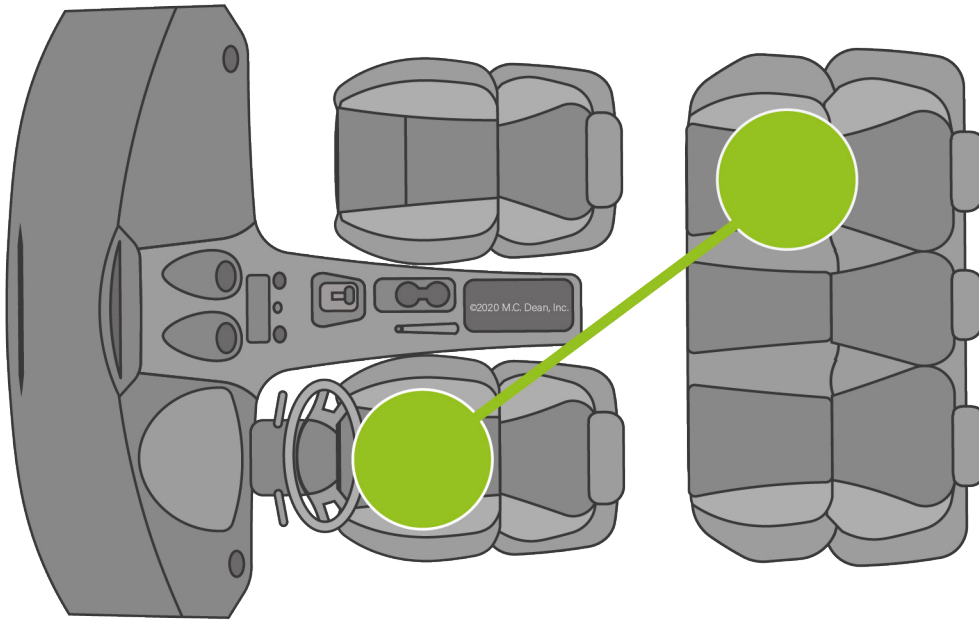
Periodically scan this QR Code to check if any new versions of AIHA's guidance documents have been posted, as well as to find guidance documents for other businesses and industries.



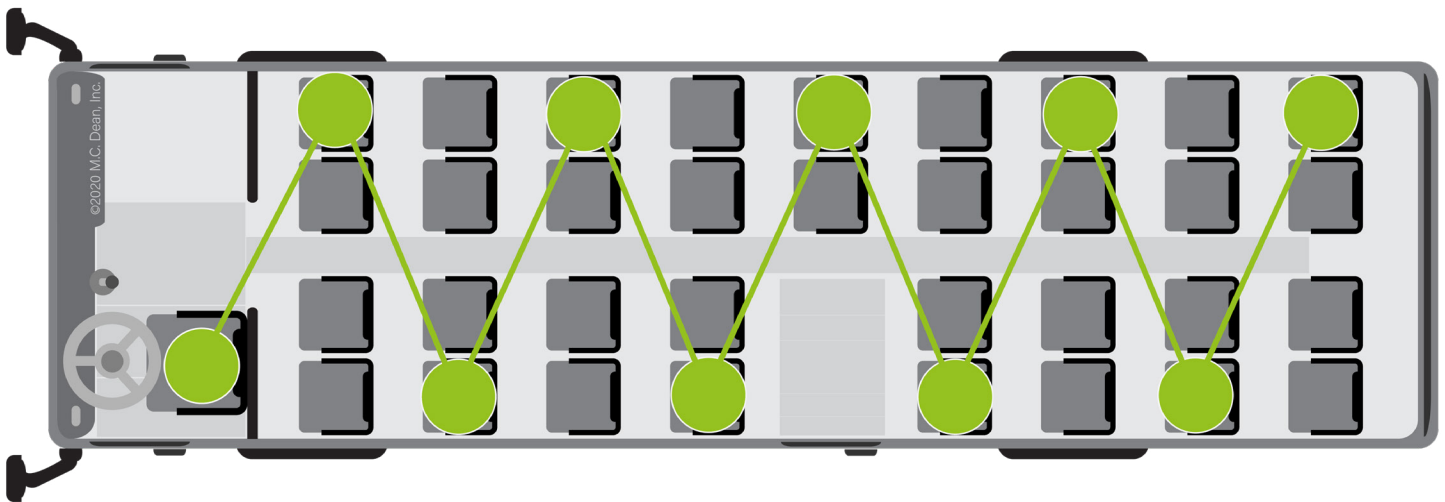
Exhibits for specific areas, items and locations

How to Move people to the project site or around the project site

Pool Vehicle Commuting spacings

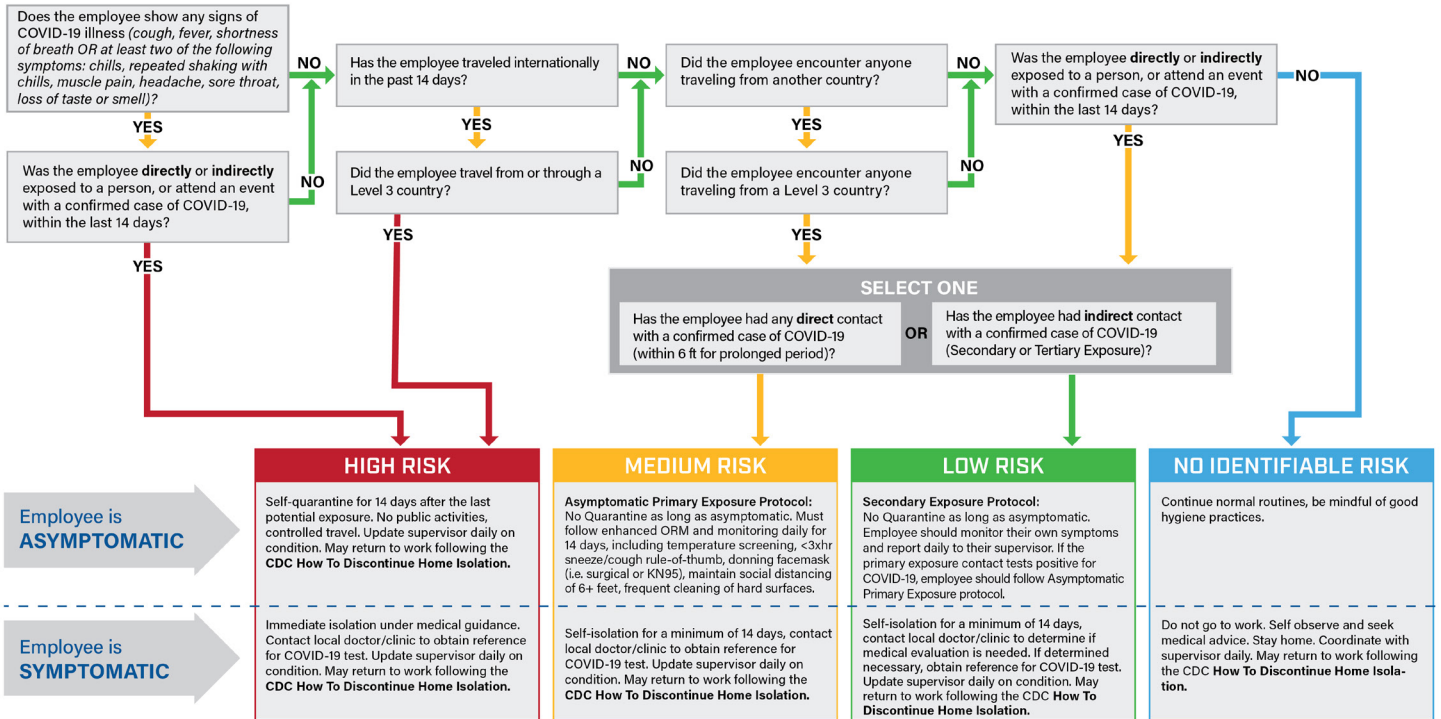


Using a Bus to move employees or general public



Decision Tree

COVID-19 | DECISION TREE



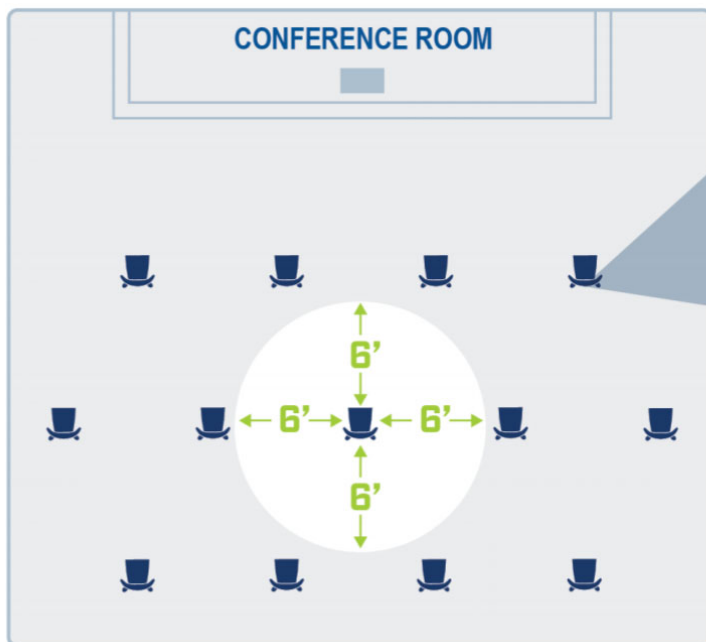
APR2020_v4.0

© 2020 M.C. Dean, Inc. Content contained herein is company guidance based on CDC recommendations for critical infrastructure workers released on April 8, 2020, and is not intended as legal advice. This version is dated April 14, 2020 and is provided courtesy of M.C. Dean, Inc. All Rights Reserved.



Communication

Posters that are visible through the workspace for general public and employees or as a quick take-away



All images and posters are courtesy of ©M.C. Dean, Inc. (2020)

