# Jobsite Safety Precautions and Best Practices during COVID-19

















#### Presented by

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## **Agenda**

Why are we here
How do I communicate with my employees
What OSHA rules may apply to Coronavirus
How Might Communications Off Site and On-Site be Effected
Impact on Jobsites
Impact on Site Processes
OSHA Recordkeeping
Questions and Answers





### Why are We Here

Jobsite

Maintain a Healthy jobsite for all

Security

Ensure our workers are comfortable coming to the Jobsite

Pandemic Times

Ensure we can keep the jobsite working during these pandemic times safely.





### How Do I Communicate with my Employees and What Should I Prepare

Provide

Provide email and or memo to employees

Acknowledge

Acknowledge Safety is the Companies Highest Priority.

Inform

Inform employees there is no immediate cause for concern. However, the company is taking the highest precautionary measures





## How Do I Communicate with my Employees and What Should I Prepare (Cont.)

Provide Provide background on the Coronavirus Inform employees of Jobsite requirements, potential 14-day incubation and/or the requirement for a fitness for Duty, and Inform any travel restrictions including business and personal travel



Provide contact information for human resources or other person responsible for action plan.





#### COVID-19 RESPONSE PLAN

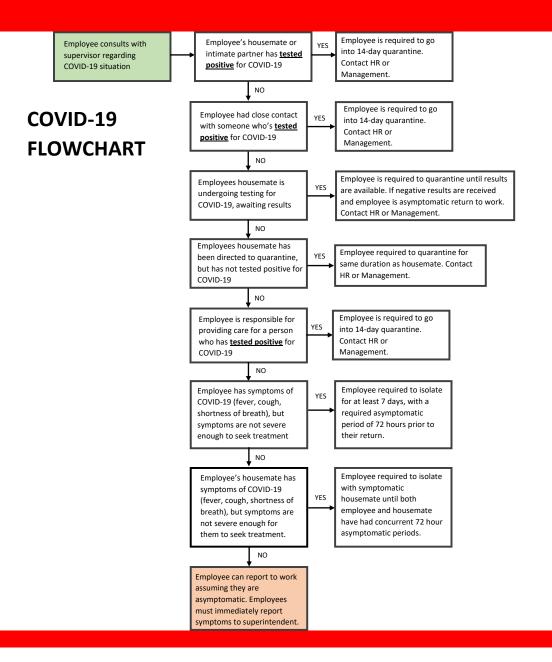
By implementing a COVID-19 Response Plan, an "essential" company pledges to dedicating resources immediately to identify and mitigate situations in the workplace which may introduce, expose or spread COVID-19. Each company's written plan, unique to the operations under its control, will document the identification and mitigation measures taken, including all engineering controls, administrative controls and safe work practices, and will update that plan on a regular basis for the duration of the COVID-19 Situation.

- Ban in-person meetings (internal or external) and employee convenings (formal or informal) of any size. Employee communication handled virtually wherever possible.
- Regular body temperature scans performed and logged for all on-site employees (contingent on availability of scanning devices, which are in short supply due to acute global demand).
- Immediate workflow audit that removes instances of employees being within 6' of each other.
- Reduction of on-site work hours to minimum needed to sustain operations.
- Staggered shifts and work hours to minimize on-site human presence at a given time.
- Staggered use of all shared spaces, including bathrooms, breakrooms and lunchrooms.
- Staggered facility entry and exit procedures.
- Mandatory work at home for all employees except the absolute minimum required for baseline production and logistics functions.
- Sanitary processes implemented throughout facility (soap, hand sanitizer, single-use gloves, doors propped open, hands-free capabilities, no shared food).
- Blue tape marking of surfaces that receive frequent human contact; disinfection of these surfaces multiple times daily.
- International travel ban business and personal.
- Domestic business travel bans except for critical operations (with senior management approval).
   Domestic personal travel requires employee to self-quarantine for 14 days and be symptom-free before returning to work.
- Any employee returning from a Level 2 or 3 CDC travel country must self-quarantine for 14 days and be symptom-free before returning to work.
- No deliveries except those that support production activities or emergency building maintenance.
- No visitors (including suppliers and customers) except those approved by senior management.

- Employees must immediately report symptoms associated with COVID-19 exposure.
- Employees must report contact with any person who tests positive for COVID-19; employee must subsequently self-quarantine for 14 days and be symptom-free before returning to work.
- Essential manufacturing personnel should be evaluated in the testing queue, especially in circumstances in which employers would request workers to be sequestered on site, Certify clean and then shelter in the workplace.











To Whom It May Concern,

Below is a quick questionnaire that we'd like your affected employee to assist in answering. The reason for the questionnaire is so that we can best respond to the project with accurate communication. Please take a few minutes to answer the following honestly and thoroughly so that we can work together on preventing the further spread of this disease.

Can we get permission to share the employee's name and a photo on the project?
 The purpose of this is to allow others to know if they worked closely to the worker.

Type answer here.

2. Who did the employee work closely with over the past working week?

Type answer here.

3. In what areas did the employee work and take breaks while working on the project?

Type answer here.

4. What date(s) was the individual onsite?

Type answer here.

5. Where and when does the affected employee believe they may have contracted the virus?

Type answer here.

6. What was the date of diagnosis and location of the test?

Type answer here.

Please remember that the purpose of this questionnaire is not to discriminate the affected employee but to help prevent the further spread of this disease and help keep our workforce and community safe.

If there are any questions regarding this questionnaire or if you have further information you wish to communicate, please contact our office at (608) 222-5100.

Thank you for your co-operation and we look forward to partnering together on this fight against COVID-19.





# OSHA General Duty Clause

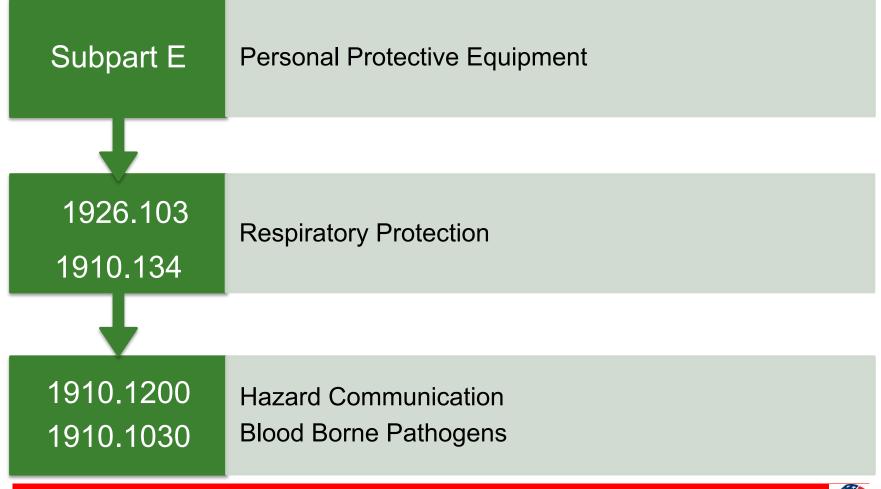


Section 5(a)(1) of the OSH Act states: "Each employer shall furnish to each of his employees, employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."





### Other OSHA Standards that could Apply







## Covid-19 Impact on Communication on site.

Additional Information

How has sharing information with your office and field personnel been effected

Changes to

Procedural changes when conducting daily safety huddles, toolbox talks, JHA's, general meetings, etc.





### **COVID-19 Impact on Jobsites**

Daily Employee Wellness Checks

Procedures/Questions to Pre-screen Wellness of Employee.

Hygiene

Procedures to improve hygiene on construction sites



Equipment
Breaks/Lunch

Procedures to sanitize Tools, Equipment, Procedures for Breaks and Luncheons.





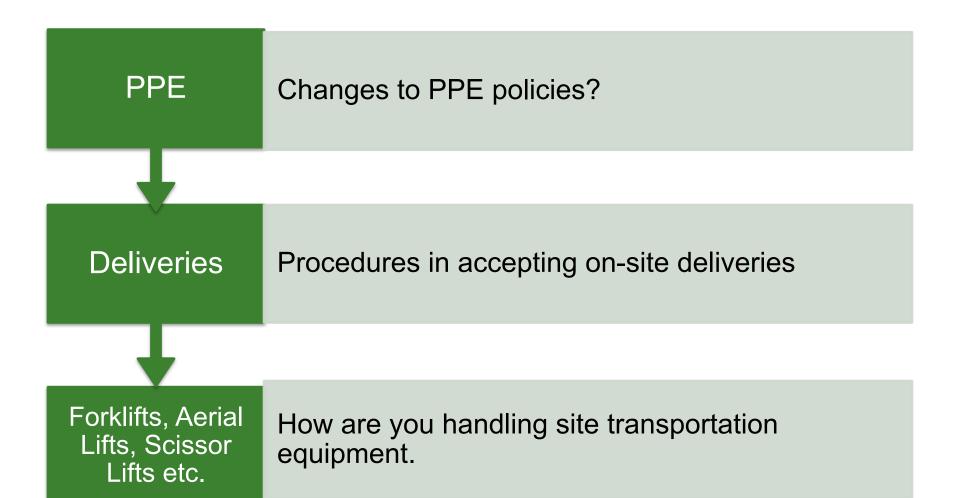








### **COVID-19 Impact on Process**







### **COVID-19 Impact on Process**

Procedures Job Rotation, Split Shifts, Remote and Teleworking. In Place **Visitors** How do you manage visitors on-site. Jobsite Shutdown Protocols and Procedures Insight





## OSHA recordkeeping considerations for workplace exposures to COVID-19

#### Recording workplace exposures to COVID-19

OSHA recordkeeping requirements at 29 CFR Part 1904 mandate covered employers record certain work-related injuries and illnesses on their OSHA 300 log.

COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are met:

- The case is a confirmed case of COVID-19 (see CDC information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19);
- The case is work-related, as defined by 29 CFR 1904.5; and
- The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (e.g. medical treatment beyond first-aid, days away from work).

Visit OSHA's Injury and Illness Recordkeeping and Reporting Requirements page for more information.





#### OSHA's 1904 – Recordkeeping requirements relating to COVID -19

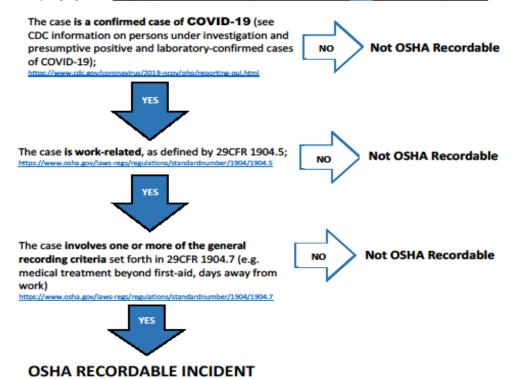
1904.5(b)(2)(viii) [work-related exception charts] applies only to the common cold or flu and not to other contagious diseases, such as COVID-19.

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#### Additional information and resources relating to this subject matter may be located at:

- Centers for Disease Control and Prevention (CDC); https://www.cdc.gov
- Centers for Disease Control and Prevention (CDC); Information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19 <a href="https://www.cdc.gov/coronavirus/2019-ncov/php/reporting-pul.html">https://www.cdc.gov/coronavirus/2019-ncov/php/reporting-pul.html</a>
- OSHA's Webpage for Recordkeeping <a href="https://www.osha.gov/recordkeeping/index.html">https://www.osha.gov/recordkeeping/index.html</a>







<sup>\*</sup>Information contained within this document is not intended to be all-inclusive and is only to be used as a guide relating to the topic provided. Refer to specific OSHA regulations CDC guidelines and local codes that may also pertain to the above listed topic.

#### Do I Need to Record a Positive Case to OSHA?

- Is COVID-19 Considered an "Illness" under OSHA's Recordkeeping Rules?
- OSHA's recordkeeping rules only apply to injuries or "illnesses." The rule defines an injury or illness as "an abnormal condition or disorder." "Illnesses include both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, or poisoning." Despite this broad definition, OSHA has essentially excluded from coverage cases of common cold or the seasonal flu. 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.
- When is a COVID-19 Case Considered Recordable?
- If an employee has a confirmed case of COVID-19, the employer would need to perform an assessment as to whether the case was "work-related" under the rule and, if so, whether it met the rule's additional recordability criteria (i.e., resulted in a fatality, days away from work, restricted duty, or medical treatment beyond first aid). Given current protocols for treating COVD-19, it is likely that for any case that is confirmed, the additional severity criteria will be met, as affected persons are instructed to self-quarantine and stay home. Thus, the primary issue for employers is

whether a particular case is "work-related."



## Do I Need to Record or Report a Positive Case or to OSHA?

A particular illness is work-related under the rule if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. 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 employer's assessment should 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. Healthcare work environments, where job activities are more likely to result in person-to-person exposure, would present a more likely scenario of work-relatedness, than non-healthcare settings. However, each work environment is different, and employers must conduct an individualized assessment when a confirmed case of COVID-19 presents.





## Do I Need to Record or Report a Positive Case or to OSHA?

#### When is a COVID-19 Case Reportable?

As with the recordability analysis above, if an employee has a confirmed case of COVID-19 that is considered work-related, an employer would need to report the case to OSHA if it results in a fatality or in-patient hospitalization of one or more employees. It is important to note, however, that the reporting obligation is time limited. Thus, if a fatality due to COVID-19 occurs after 30 days from the workplace incident leading to the illness, an employer is not required to report it. Similarly, if the in-patient hospitalization occurs after 24 hours from the workplace incident leading to the illness, an employer is not required to report. Given the nature of COVID-19 and the disease progression, this may result in fewer reports to OSHA despite expected hospitalization of cases going forward.





## Questions



