Overview

The construction industry provides unique challenges to remaining open or returning to work during the pandemic. The return to work guidance provides guiding principles for actions the construction industry (employers and employees) can take to keep employees safe and work moving forward. The construction industry serves as the backbone for many supply chains, construction, and specialty contracting organizations. They have adapted rapidly to the changing health and safety challenges SARS-CoV-2 / COVID-19 have introduced and as it evolves.

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. Project sites should create pandemic infection control plans and follow the hierarchy of controls when developing controls measures for physical distancing, worker hygiene and advanced cleaning & disinfecting protocols. Both CDC and ASSP provide guidance on applying the hierarchy of controls.

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 project sites 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.
- Provide employees with accurate, understandable information about the SARS-CoV-2 virus and COVID-19 disease and what steps can be taken to protect them.
- Complete a task-based risk assessment or job hazard analysis to best determine social distancing of at least 6 feet and evaluate where engineering controls and/or administrative controls can be implemented to reduce or eliminate spread.

Ensure staff have face coverings and/or face shield for the reduction of virus spread.

- Reduce the number of individuals to the site to essential staff to complete the work.
Returning to Work: Construction Environment

DISCLAIMER: These are meant to be general guidelines to help you re-open your establishment. Always follow local, state and federal laws and guidelines.

• 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.
• Design work to reduce the number of people working in the same area, so employees can maintain 6’ distances. Do not allow trade stacking unless it can be done without forcing employees to work near others.
  – Consider limiting meetings to 10 people or less. Employees shall use virtual meeting tools, 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 for the purposes of contact tracing. This log should include the date, time, and contact information of the visitor.
• Hold toolbox talks and safety meetings where there is adequate spacing (even when outdoors) and only have one person note who is in attendance (avoid sharing pens or tablet devices).
• Stagger shifts and other trades to isolate and compartmentalize staff. This will allow protection of others if an outbreak 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 wearable technology such as proximity devices worn on hard hats or wrist bands to monitor employee physical distancing and tracing of contacts.
• 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 between 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 through daily questionnaires of symptoms, exposure potential and travel to areas with widespread transmission. If they are not feeling well, stay home.
• Revisit your leave or sick program to allow for time off.

– CDC and recent studies have shown COVID-19 can stay active up to 3 days on surfaces.
• The Families First Coronavirus Response Act (FF-CRA) recognized the role of sick leave in addressing the pandemic. It calls for certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19.1 The law also provided for a tax credit to cover the costs.2

• Provide up-to-date information about COVID-19, SARS-CoV-2 and local, state and federal guidelines.
  – Engage your human resources for health and wellness programs, which should include mental health resources and support.
  – Provide additional information for employee and family use (e.g., Employee Assistance Program, EAP).

• If a positive COVID-19 case amongst the workforce is identified, conduct contact tracing for anyone who may have come in contact with the employee, identify areas of the work environment the employee worked and accessed for disinfecting/cleaning and isolate those areas until cleaning has occurred.
  – Contact tracing and sharing of employee information should be done under the guidance of Human Resources due to privacy requirements of HIPAA, ADA and EEOC.

• For disinfection, diluted household bleach solutions, alcohol solutions with at least 70 percent alcohol, and EPA-registered disinfectants on List-N should be effective when used according to the manufacturer’s instructions.

• PPE: for close contact activities that cannot accommodate physical distancing, use the hierarchy of controls to implement feasible safeguards and/or production and work practice modifications before relying on PPE exclusively. It is recommended to provide or require face coverings to be worn at all times in the work environment. See below for examples.

NOTE: N95s should be reserved for healthcare workers. If an employer chooses to provide an N95 respirator, please fully consider all the potential OSHA requirements for use of respiratory protection (medical evaluation and respirator fit testing).

<table>
<thead>
<tr>
<th>Surgical Mask</th>
<th>Dust Mask</th>
<th>Cloth-Based Face Covering</th>
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<tbody>
<tr>
<td><img src="image" alt="Surgical Mask" /></td>
<td><img src="image" alt="Dust Mask" /></td>
<td><img src="image" alt="Cloth-Based Face Covering" /></td>
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<tr>
<td>Flat, rectangular, and made of thin, paper-like material. This mask fits loosely around the nose, mouth, and chin.</td>
<td>Flexible paper pad held over the nose and mouth by elastic or rubber straps.</td>
<td>Easily made from household items, such as a bandanna. See CDC instructions how to make a face covering at home.</td>
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- For transparency, each contractor should notify the client and/or general contractor of any positive cases or close contact to positive cases (involve your HR professional to ensure privacy requirements are followed and maintained when communicating employee illness).
- Follow CDC guidelines and exposure protocol for Critical Infrastructure Workers.
- Communicate and reinforce with employees (while maintaining privacy requirements per HIPPA) they may have been exposed and they need to closely monitor their health, including checking their temperatures often and watching out for COVID-19 symptoms.
- Employers should screen employees for elevated temperatures at or above 100.4 degrees Fahrenheit prior to entering the work environment using a non-contact thermometer or infrared camera meeting FDA recommendations. Employers should also have employees complete a medical questionnaire to evaluate their current physical state before entering any job site. While screening employees prior to entering the work environment, physical distancing of 6 feet or greater shall be maintained or a physical barrier should be created or use of a camera technology to eliminate person to person exposure should be considered.
- Provide employees with additional PPE and monitoring (at the company’s discretion).
- Follow Critical Infrastructure Exposure Protocol
  - CDC interim guidance.

Screening and Temperature Check Tips for Employees

- Employees, should monitor their temperature at home, update their supervisor if they have a temperature exceeding 100.4 degrees Fahrenheit, and refrain from reporting to work. You should consult a health care provider about your symptoms and should not attempt to go to work until your 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 should not enter the workplace, monitor for symptoms, and contact a healthcare professional.
  - 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 in the last 14 days.
  - Infrared camera/thermal imaging, or non-contact thermometer camera can be used to take your temperature at the job site and allows for accurate information without the need to touch the employee. FDA recommended tele-thermographics systems use for temperature screening.
  - CDC interim guidance for businesses and employers responding to Coronavirus Disease 2019.

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 like the Center for Disease Control and World Health Organization.
- If you feel unwell or have any of the symptoms associated with COVID-19, stay home. NOTE: Employer HR Policies, HIPPA guidelines and other...
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**Guidance Document**

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- **Self-monitor your temperature every morning.**
- **If you have had close contact with someone who has tested positive for COVID-19, you should quarantine for 14 days and monitor yourself for symptoms.** CDC recommends testing for close contact exposure to individual who is infected with COVID-19, see CDC recommendations for testing strategies for [critical infrastructure workplaces](https://www.cdc.gov/coronavirus/2019-ncov/hcp/essential-workers.html).
- **Understand the rules within the workspace – avoid large gatherings of greater than 10 employees, unless physical distancing of 6 feet or greater can be maintained.**
- **Maintain your face covering and use it along with any safeguards and/or other controls implemented if you are not able to maintain at least 6 feet of physical distance.”**
- **Maintain good hygiene practices (washing hands with soap and water) or a hand sanitizer with at least 60% alcohol.**
- **Weekly toolbox talks should be virtual or in smaller groups. All hands meetings shall be reduced.**
- **If you feel sick, stay home. Consult with your local health care provider about ways to get tested for COVID-19.**
- **Returning back to work, employee should at minimum follow most recent CDC guidelines.**

**What can Visitors to the jobsite do to minimize the transmission of COVID-19?**

- **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.**
- **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.**
- **In-person meetings should be avoided, and the use of video, chats, or other conference line-type systems should be considered first.**

**Resources**

- AGC: The Construction Association – [Proactive Measures for Addressing COVID-19 / Pre-Screening Questionnaire](https://www.agc.org/coronavirus-pre-screening-questionnaire)
- Cybersecurity and Infrastructure Security Agency [CISA resource on Critical Infrastructure Workers](https://www.cisa.gov/preparedness/critical-infrastructure-workforce)
- Numerous [wellness questionnaire examples](https://www.meridianhealth.com/coronavirus-testing) are available online (e.g.)
- The EPA has developed a list of disinfectants for use against SARS-CoV-2.
- [CDC Interim Critical Infrastructure Guidelines](https://www.cdc.gov/epidemicresponse/criticalinfrastructureguidelines/)
- [EPA-Registered Approved Disinfectant List N](https://www.epa.gov/cleanwater/registered-approved-disinfectant-list-n)
- [CPWR](https://www.cpwr.com)
- [NIOSH site.](https://www.cdc.gov/niosh/)
- [AIHA’s Indoor Environmental Quality Committee guidance documents: Reopening Closed Buildings and Cleaning Buildings](https://www.aiha.org/ieq/reopening-closed-buildings/
- [American Cleaning Institute’s COVID-19 Resources](https://www.aci-linear.com/covid-19)
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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.

Find a qualified industrial hygiene and OEHS professionals near you in our Consultants Listing.

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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
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Communication

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

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