As of 5/6/2020 at 4pm

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC OPPORTUNITY

Department of Labor and Economic Opportunity *Return to work guidelines for construction*

PRELIMINARY AND PRE-DECISIONAL | MAY 6TH, 2020



Eight steps for employers to keep their workers safe, within the hierarchy of controls



Administrative controls









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Administrative controls

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1 Administrative controls

Create an exposure control plan

- Document and share written exposure control plan to mitigate employee exposure
- This plan should include an exposure risk determination for all employees, and detail measures employer will take to prevent exposure, including:
 - Administrative controls, including access
 - Engineering controls, including any steps taken to physically reconfigure the workspace and workflows
 - Policies governing social distancing
 - Policies governing personal hygiene
 - Policies governing cleaning and disinfection
 - Policies governing personal protective equipment
 - Policies governing
- The exposure control plan should incorporate the latest guidance for COVID-19 from the Center for Disease Control and Prevention (CDC), and any federal requirements issued by: federal, state, county, and municipal authorities; employers; and project owners
- The exposure control plan may differentiate between workers commensurate with their exposure risk, with more stringent measures for higher risk categories

Administrative controls





Establish response owners

- Team members with individual accountability should be identified, tasked with management and direct verification of implementation of all elements of the exposure control plan
- At minimum, one COVID-19 response manager should be identified for every individual worksite and project
- If feasible and depending on size of worksite, consider dedicating staff to virus response (sole or primary responsibility)

Define the scope of the response team, including:

- Design, implement, and report out to management on workplace risk mitigation program
- Create and complete a "health checklist" or daily symptom tracking survey
- Establish points of contact and appropriate communications cadence with relevant labor union and state and local public health agencies
- Work with the relevant labor union to improve safety protocols and to ensure robust enforcement and reporting of workplace health / safety events
- If feasible, leverage a digital tool or dashboard to track implementation of protocols and opportunities to tighten or improve

Administrative controls

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Train employees

- All employers should conduct a safety stand-down toolbox talk or tailgate training, on all jobsites, before resumption of work
- The curriculum of this training should:
 - Explain all elements of the exposure control plan, with specific guidance on access control, distancing, sanitation, hygiene, and use of personal protective equipment
 - Include demonstration of proper use of personal protective equipment, including donning and doffing
 - Explain worker's rights and protections, including access to leave, and specify the steps that the employee can take if they feel unsafe in the workplace
- Training should be jointly led by the ranking manager on the jobsite, a labor union representative, and designated members of the COVID-19 response team

Administrative controls: example

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Establish team or roles

LEADERSHIP & MANAGEMENT

- Identify the person responsible for auditing implementation on each project. That will be the site
 safety representative (e.g. safety person, superintendent). The COVID Safety Rep Checklist
 should be used daily to ensure proper implementation. Reference Appendix G COVID-19 Safety
 Representative Checklist
- Project teams to attend the daily huddles and make these action plans a topic of huddle conversation. Similar to safety ask the question – "How will or what can we do to keep ourselves healthy today." (REMEMBER: SMART Social Distancing.)
- INCIDENT COMMANDERS: Have been identified by the company. Reference Appendix A Incident Commanders by Region. If an infected person is identified, the respective Incident Commander is to be notified. Respect and maintain each persons' dignity and privacy. Reference Appendix B – Incident Control Plan.
- Implementation is a team responsibility, led by the Project Manager or Superintendent.
- The Project Manager is to communicate the plan and updates to all Suppliers, Subcontractors, Vendors, and Service Providers.
- The Project Executive is to communicate the plan and updates to the Customer.
- If a project is being re-started or is a new project reference Appendix F COVID-19 New Project and Restart Guidance
- If a person notifies us that they were infected, report the incident to the INCIDENT COMMANDER immediately.
- If possible, at your site or campus create an isolation area for those individuals that show/have symptoms of COVID-19. Also, consider on-site nursing stations where applicable.
- Be aware of worker's concern about pay, leave, safety, health, and other issues related to the crisis.

Define scope of team (e.g., manage implementation of practices and protocols)

	Appendix G – COVID-19 Safe	ty Representative Checklist
	Version 7, Ap	pril 2, 2020
ith nd n ava	g any of the phases of the COVID-19 Response the COVID-19 Operations Guide. Please initial e maintain a file for these inspections at the projec allable.	the designated COVID-19 Stockey Representative Plan. All tasks should be carried out in accordance add box upon full completion of the individual task take. This is subject to change as more information et 8:
=	Daily Che	COVID-19 Virus Prevention
	PHASE 1 AND 2 IMPLEMENT	
1	Identify the Incident Commander for your project	The COVID-19 virus has spread quickly across the United States. Every state has had at least on person infected with the virus.
2	Subcontractors need to ensure that the questionna huddle etc.)	
3	Identify and communicate location of isolation area COVID-19 or who have had a high-risk exposure	This virus is highly contagious. A contaminated person can spread the infection when they cough or sneeze, and the infected droplets get transmitted to someone else.
4	Establish if the project's medical provider has COVII if yes, this can be used as a resource for en provider. DO NOT GIVE OUT AUTHORIZAT someone out. if not, attempt to locate one in the general	To prevent the transmission of this virus, we must first understand how it is spread – from person to person. Toolbox Talking Points
	 If the employee has a personal medical pro provider and follow their instructions for to 	TOODOX TAIKING FOILTS
5	Identify professional cleaning service to be called if If a local company is not available reach ou	No one wants to spread an infection unknowingly. Initially, a person may be infected without showing symptom of the disease. Therefore at this critical time, we must all consider ourselves potential sources of infection and
6	Establish site entry protocols via COVID-19 Operation	act responsibly to control the spread. Act as if you are infected!
7	Project workers are practicing Social Distancing with	The best-known practices to reduce person to person transmission are as follows: 1. If you have any signs of infection, isolate yourself from others and stay home from work.
8	Ensure the following COVID-19 prevention signs are COURDANTED TO THE STATE ST	a. A beit practice is taking your temperature each day before lexing your house. The medical professional conside 100.4 for greater a fiveritab. Practice social distancing— make and efforts to stary a minimum distance of 8 ket from others. Since recent the start of the star
9	Maintain the daily questionnaire records completed Both paper and electronic copies need to b	others at risk of transmitting the infection.
-	 Notify Incident Commander of person(s) w 	Avoid grouping in elevators, take the stairs if feasible.

Access control

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Reduce congestion at start times and entry points

- Employers should assign dedicated entry point(s) for all employees or groups to reduce congestion at main entrance, help with screening needs, and help with tracing
- Employers should label queue spots with X's outside building in case of congestion
- If feasible, employers should consider staggering start times for locations to ensure social distancing and effectiveness of screening protocols (50/50 rotational schedules)
- If feasible, employers should create one-way flow corridors onto the site, wherever possible

Screen employee health / exposure:

- Employers should conduct daily entry self-screening protocol for all employees i.e., symptom tracking and exposure questionnaire
- Employers should take worker temperatures as a condition for daily site entry
- Workers should be barred entry if they have a fever (100.4'F based on temperature checks); or otherwise if the employee identifies coughing, or shortness of breath each day before leaving for work, before the shift, mid-shift, and at end of shift

Access control





Control site access for non-employees

- Employers should bar all non-essential visitors and contractors from the worksite
- Employers should require that essential visitors and contractors should schedule their visits ahead of time and attain explicit approval before arrival (e.g., conduct visitor questionnaire virtually and deny visitors who do not meet requirements)
- Employers should control site access (e.g., restrict visitors, contractors, deliveries implement screening practices similar to employees), or in the alternative issue stickers or other indicators to workers to show that they received a screening before entering the worksite that day

Consolidate entry points

 Employer should put physical barriers (e.g., caution tape, plastic netting, gates) in place to prevent anyone from bypassing screening (if not possible, ensure there is some indication of employees having gone through screening – e.g., sticker)

Access control





Restrict business and personal travel

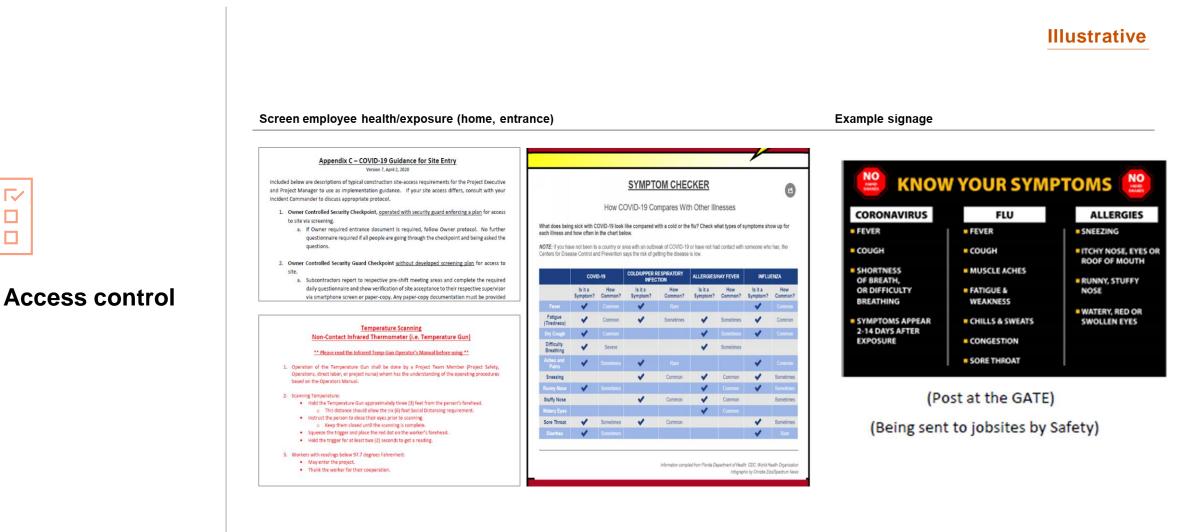
- Employers should only permit business critical travel
- Employers should reduce risk from contractors by restricting unnecessary movement between project sites and establishing minimal handoff deliveries
- Employers should require 14-day quarantine after returning from any necessary personal travel (confirm with site leader upon return)

If possible, modify transportation practices

- If transportation is employer owned / managed, employer should consider utilizing assigned seating to simplify contact tracing should an employee be diagnosed as COVID-19 positive
- Employers should work with transportation provider(s) to review health screening (reducing shift changeover time) and disinfection protocols for seats and other common surfaces

Access control: example

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Social distancing





Increase distance between people

- Employers should establish sitewide requirement for social distancing in accord with CDC guidelines (6 ft) [When 6 ft distancing is not feasible, workers are at higher risk; see PPE section for additional guidance]
- Employers should eliminate occasion for interactions with visitors or the general public

Limit use of common spaces

- Employers should identify (with signage) and consider closure / occupancy limits for common choke points where workers are forced to stand together, such as hallways, hoists and elevators, break/lunch areas, buses (see "provide reinforcements" section for details)
- Employer should require physical distancing in lunch and break areas and provide physical markers (e.g., tape on the ground to assist)
- If feasible close break/lunch areas if possible and encourage employees to eliminate eating in groups (eat in personal vehicles)
- Employers should consider increasing distancing for portable restrooms on site: e.g., increase number of restrooms, timing between use (e.g., employee to monitor)
- Employers should install touchless waste bins; turn off shared water fountains

Social distancing

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3 Social distancing

Stagger shifts and timing to reduce congestion

- Employers should consider staging / staggering crews and modifying work schedules to limit number of workers on site
- Employers should consider Stagger start times and meal times (e.g., by 15 mins)
- Employers should minimize interactions when picking up or delivering equipment or materials (e.g., PPE, surface disinfection), and organize the placement of materials to minimize movement on the work site

Provide visual cue to reinforce distancing expectations

- Employers should employ visual cues to enforce distancing wherever possible (e.g., tape, ground markings, walking traffic patterns marked, physical barriers, elevator guidelines, signs with social distancing requirements)
- Employers should post signage and train people not to congregate at break areas, toolboxes & tool cribs, lunch areas, etc.

Social distancing: example

Illustrative





Limit common space use and operations

Provide reinforcements (e.g., X's) for distancing expectations

 Make sure there are enough temporary/portable toilets on site, per contract requirements. Increase cleaning of toilets to three (3) times per week and make sure they are properly stocked with supplies. Work with your project vendor. OSHA count guidance is:

Number of employees	Minimum number of tollets	
of each sex	per sex	
1 to 15	1	
16 to 35	2	
36 to 55	3	
56 to 80	4	
81 to 110	5	
111 to 150	6	
Over 150	1 additional toilet for each additional 40	
	employees.	
Note to Table F-2 of 6 1915.88: When to	lets will only be used by men, urinals may be provided instead of toilets, except that the number of toilets in	such cases shall not be red



(Post at various entry locations & Safety boards) (Print these on jobsites. Graphics on SharePoint.) Hygiene







Provide handwashing / sanitation options

- Employers should provide soap and running water wherever possible on job sites to permit frequent handwashing
- Alcohol-based sanitizers (greater than 60% ethanol or 70% isopropanol) should be provided as a backup, only in the event that providing supply of running water is impossible
- Employers should provide individual hand sanitizer bottles to workers, and position extra hand sanitizer in areas next to shared tools, equipment, and materials
- Employers should develop policies specifying that handwashing is required for all workers at the start of the shift, breaks, bathroom trips, lunch, team huddles, at the end of the shift, and after any close contact with someone displaying cough or cold symptoms
- Employers should post signage for hygiene (wash hands, cover cough, don't touch face)

Sanitation

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Conduct more frequent cleaning

- Employers should fully disinfect work site areas and common surfaces prior to site reopen
- Employers should identify responsible for party for cleaning / sanitation by project site (e.g., one person/shift or every worker), and clearly communicate this to employees
- Employers should frequently clean and disinfect high touch surfaces on job sites
 - "High touch surfaces" will include shared tools, machines, vehicles and other equipment, handrails, doorknobs, etc. frequently, per CDC guidelines; for shared items like tools, wipe with disinfectant before being transferred
 - Employers should more frequently clean toilets and portable restrooms
- If feasible, employers should ensure optimal turnover of fresh/clean air on site if enclosed (e.g. bay and other doors/windows opened where feasible)

Provide cleaning materials and establish protocols

- Employers should provide disinfecting materials, EPA-approved for emerging viral pathogens
- Employers should create policies governing cleaning shared tools, vehicles, and inventory, among other items, and require disinfection at the beginning and end of individual usage
- Employers should provide time for employees to clean at the start and end of shifts

Sanitation: Example







Pandemic Cleaning Protocols	Method				
Wash-down with bleach/ water combination	Sprayer with Bleach/Water or Disinfectant	oth Vater t	requency	skeg	Party
FIELD AREAS					
Turnstiles including frames (if Applicable)	×		Min. 2x Daily	Every	Laborer
Entrance/Exit doors, top to bottom	×	×	Min. 2x Daily	Every	Laborer
Separation barrier between Screener and personnel entering the jobsite	×	×	Daily	Every	Laborer
Interior Restrooms including sinks, counters, toilets, urinals, stalls/walls, dispensers, doors, dryers, etc.	×		Min. 2x Dally	Every	Laborer
Restroom mirrors			Daily	Every	Laborer
Porto Johns Including handles, walls, dispensers, etc.	×		Min. 2x Dally	Every	Laborer
Door Hardware including fence latches	×	×	Min. 2x Daily	Every	Laborer
Hoist Controls (If Applicable)		×	Min. 2x Daily	Every	Laborer
Holst Gates (If Applicable)	×		Min. 2x Daily	Every	Laborer
Construction Elevator (If Applicable)	×		Min. 2x Daily	Every	Laborer
Tables, Benches and Chairs	×		Min. 2x Daily	Every	Laborer
Fire Extinguishers		×	Daily	Every	Laborer
Medical Equipment otherwise not cleaned by medical		*	Min. 2x Daily	Every	Laborer
Temporary Power Panels/Outlets		×	Weekly	F	Electrician
Generator controls		×	Weekly	F	Electrician
Sign in/Log books		×	Min. 2x Daily	Every	Laborer
Drinking Fountains/Water Coolers		×	Min. 2x Dally	Every	Laborer
Security Booth (If Applicable)		×	Min. 2x Daily	Every	Security
Closed Trash Receptacles	×	×	Min. 2x Daily	Every	Laborer
Gang Boxes including outside of box	×	×	Min. 2x Dally	Every	Laborer
Field Offices/Break Areas including tables, chairs, benches, appliances, cabinets, etc.	×		Min. 2x Daily	Every	Subs

Appendix E – COVID-19 Cleaning Guidance Procedure

OFFICE AREAS-SUB AND WA					
Offices/Break Areas/Trailers	×	×	Min. 2x Daily	Every	Office Staff
Doors and Hardware		×	Min. 2x Daily	Every	Office Staff
Desks and Chairs		×	Min. 2x Daily	Every	Office Staff
Computers/Keyboards/Mice		×	Min. 2x Daily	Every	Office Staff
TVs/Remotes		×	Daily	Every	Office Staff
Coffee makers		×	Min. 2x Daily	Every	Office Staff
Telephones/Conference Phones		×	Min. 2x Daily	Every	Office Staff
Copy Machines		×	Min. 2x Daily	Every	Office Staff
Drinking Fountains/Water Coolers		×	Min. 2x Daily	Every	Office Staff
Tables and Chairs		×	Min. 2x Daily	Every	Office Staff
File Cabinets and Hardware		×	Min. 2x Daily	Every	Office Staff
Stairways	×		Daily	Every	Office Staff
Railings	×		Min. 2x Daily	Every	Office Staff
Microwaves and other appliances	×		Min. 2x Daily	Every	Office Staff





Enforce PPE use

- Employers should analyze and understand requirements (consistent with guidance and requirements issued by: Federal, state, county / municipal authorities, employers, owners)
- Employers should require face coverings for all employees on the site when indoors (provided by employer), with potential for a more stringent standard (e.g., N-95 masks for high risk exposure workers – be attentive to evolving public health guidance)
- Employers should require that employees use facial coverings before employees approach the facility entrance check point
- Employers should require that facial coverings be worn by all employees who cannot consistently maintain 6 ft of separation from other employees (provided by employer), as appropriate and dictated by activity

Distribute PPE

- Employers should consider establishing a mask pick-up location on site for those who need replacement (provide reason)
- Employers should record and track who has received their masks (e.g., weekly allotment for employees)



6	PPE
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Ensure stocking

- Employers should confirm stock of facial coverings, face shields, gloves, and glasses on site and on order with lead time
- Employers should confirm that the operation has an adequate supply of additional health supplies (e.g., soap, disinfectant, hand sanitizer, paper towels and tissues
- Employers should target no more than 30-day stock of critical supplies exists (e.g., sanitizer, masks) on site or on order with sufficient lead time, and avoid stockpiling

Provide guidance on PPE

- Employers should communicate guidance on PPE use while on the worksite, which may vary by employee
- Employers should train employees on the use of PPE (including storage, doffing and redonning facial covering), in addition to the protective triad of personal hygiene, social distancing and frequent disinfection
- Employers should permit voluntary individual use of masks in excess of guidelines
- In case of any conflict between any of foregoing guidance, the strictest measure should apply

PPE: example

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6 PPE





Case monitoring

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Define protocols for symptomatic employees

- Employers should ensure that employees with symptoms (based on self assessment, screening etc.) are sent home
- Employers should instruct that sick employees stay home in accordance with most recent Executive Orders
- Employers should ensure protocols are visible in the facility (e.g., post signage to stay at home if specified symptoms occur)
- Employers should ensure isolation protocol and areas established to isolate symptomatic employees prior to sending to medical care or home to self-quarantine
- Employers should identify and train Isolation Coordinator(s) for on-site assistance
- Employers may also provide guidance where appropriate and support for employees (e.g. virtual training, etc.)
- Employers should check in periodically with employee on symptoms and work ability
- Employer should report confirmed cases and outbreaks to state and local public health authorities, including any relevant information on circumstances of transmission and contacts of the infected worker

Case monitoring





Provide guidance to exposed employees

- Employers should follow CDC response guidelines for exposure cases
- Employers should inform team members and relevant managers of their potential exposure when employee is sent home
- Employers should enact policies to encourage workers to stay home / leave worksite (e.g., temp paid sick leave) when feeling sick, or after close contact with a confirmed positive case
- Employers should trace close contacts of the infected worker within the workplace, for 3-7 days prior to onset of symptoms (based on where employee was and whether PPE was worn). See details on how to qualify "contact" on following page
- Communicate procedures with employees

Mark off and clean spaces identified in workplace tracing

- Employer should clean appropriate areas based on tracing procedures and CDC recommendations whenever a person has been sent home for symptoms
- Employer should perform a site area deep cleaning/disinfection (e.g., misting) as well as physical disinfection of common tools and surfaces whenever a COVID-19 person has been confirmed at the site
- If feasible, employer should consider leveraging a third-party cleaning service

Case monitoring



7 Case monitoring

Define protocol for symptomatic employees

Appendix B – Potential or Confirmed Case Action Plan Version 7, April 2, 2020

ONSITE INCIDENT ACTION PLAN:

This portion of the plan defines the proper procedure for dealing with potential or confirmed cases of COVID-19 on the jobsite. Decisions regarding the possible personal and location/material exposure can be made using the CDC's Guidance of Public Health Management and Decision Making and Environmental <u>Cleaning Guidance</u>.

- Isolation of a person presently on site is symptomatic:
 - Move potentially infectious people to an isolation area.
 Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until potentially sick people can be removed from the worksite.
 - A temporary toilet facility (i.e., port-a-john) is NOT considered an isolation room.
 - Provide a facemask and gloves, if feasible and available, and instruct the person to wear it.
 A facemask (also called a surgical mask, procedure mask, or other similar terms) on a patient or other sick person should not be confused with PPE for a worker; the mask, acts to contain potentially infectious respiratory secretions at the source (i.e., the person's nose and mouth).
 - Restrict the number of personnel entering isolation area.
 - Personnel who interacted with the ill person(s) must wash their hands.
 - Direct the ill employee to leave work and go home or to the health center as advised by the local authority. O Public transportation must not beused.

If there is a case of COVID-19 on the jobsite, it is essential to

Stay Calm and follow the steps outlined below

**Situation Assessment (2) and Notification Guidelines (3) should be done concurrently **

- Situation Assessment: If a COVID-19 case is confirmed or deemed a Person Under Investigation (PUI) by a medical professional within the past 14 days for someone NOT currently on site.
- Verify Date, Time, and Location of Incident
- a. Is the positive case of COVID-19 confirmed to belong to someone from THIS site?
 Assess risk of Person(s) and Area(s) possibly exposed to COVID-19
 - a. What company did the person work for?
 - b. What day and time was the employee last on site?
 - c. How many employees does that contractor have on site?
 d. Who else was working with the positive employee?
 - Where on the jobsite was the work being performed?
 - f. What materials/equipment were being used by the employee?

Mark off and clean spaces identified in tracing

- g. Does the subcontractor have an office space and/or break area?
- h. How many other subcontractors performed work in the area occupied by the positive employee?
- Discuss proper next steps with the safety representative and Incident Commander using the CDC flowchart (attached).
- Stop Work and Evacuate the office/space occupied by the person(s) who was confirmed positive with COVID-19.
 - The size of the area to be evacuated will depend on the circumstances and judgement of the incident commander in coordination with the VP of HSE and Project Executive.
 - Common areas, including meeting rooms, shared equipment (e.g. copiers/printers), restrooms, kitchenette, should be evaluated.
 - Maintain social distancing during evacuation procedure.
- Restrict access to the identified affected areas.
 - Smaller areas or rooms: cordon off for cleaning and disinfecting. See cleaning guidelines below.
 - Larger areas: cordon off/isolate the areas the person occupied and any high-touch surfaces the person may have come into contact with (and anything within 6 feet of those item)
 - Increase ventilation in larger areas by opening windows/doors and improving airflow if possible. If there is little to no airflow, treat it as a smaller area or room, as described above.

Facility closure

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Enforce appropriate shutdown / cleaning protocols

- Employers should establish site specific response plan for confirmed cases (e.g., investigate, formulate response and cleaning procedures); if a worker goes home from the site with symptoms disinfect the area, supplies, and tools that person worked with immediately.
- Employers should shut down appropriate locations on the site down for deep cleaning (enforce appropriate amount of shutdown time) if there was a confirmed positive case

Communicate exposure to employees

- Employers should conduct workplace contact tracing investigation for confirmed cases and notify those contacted or suspected of being in contact (e.g., notify contractual upstream entity: if subcontractor, notify Contractor; if Contractor, notify Owner)
- Employers should ensure appropriate documentation of positive cases for necessary parties (labor union, health services, health insurance), and record confirmed cases
- Employers should ensure employees who were potentially exposed to a positive case on site to monitor symptoms closely and stay home if there was a high risk of exposure or symptoms occur (while maintaining employee privacy)