



TO: Contractor Members of the General Contractors Association of Hawaii, Building Industry Association of Hawaii, and Pacific Resource Partnership

DATE: April 9, 2020

SUBJECT: Sample COVID-19 Jobsite Policy (Hawaii)

These are unprecedented times. The COVID-19 Pandemic has crippled our state, country and the world and disrupted our lives in ways we never imagined were possible. For the most part, Hawaii’s Construction Industry has fortunately been deemed “essential” and entrusted to continue working. That trust comes with a great responsibility to ensure every jobsite – large and small, vertical and horizontal, commercial and residential – has appropriate measures in place to ensure the safety and health of the individuals who work there and, by extension, our island communities at large.

Our three industry associations – General Contractors Association of Hawaii (GCA), Building Industry Association of Hawaii (BIA), and Pacific Resource Partnership (PRP) – represent the vast majority of contractors in the State of Hawaii. We are asking you – our members – to commit to following the guidance and safety requirements government officials have provided to protect your workers from COVID-19. The ability to work through this public health crisis is a privilege; a privilege that can easily be taken away.

Beyond that, it should be noted that the Occupational Safety and Health Administration (OSHA) has made a determination that COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. Contractors should read and understand [OSHA’s guidance on COVID-19](#).

The best way to protect yourselves is to implement a good COVID-19 jobsite policy and ensure every individual on every jobsite is following it to protect themselves and others from the coronavirus. Many of you have already implemented your own COVID-19 policies but, for those who have not, attached hereto is a Sample COVID-19 Jobsite Policy that you are encouraged to review. You are welcome to use the sample policy to meet your company’s needs – whether it is simply to compare against your own policy and adopt measures your policy doesn’t include, or to adopt the policy in its entirety. Your company should tailor these guidelines to reflect your specific type of work and/or circumstances and rely upon official sources, such as The Centers for Disease Control and Prevention (CDC), the Hawaii State Department of Health (DOH), and OSHA for up-to-date information and recommendations.

Finally, thanks to the following organizations who lent their knowledge, time and support to the Sample COVID-19 Jobsite Policy:



DISCLAIMER

These materials are provided for general informational purposes only, are not intended to constitute legal advice, and should not be interpreted by you as legal advice. Legal advice is dependent upon the specific circumstances of each situation, and relevant law often changes. The situation is rapidly evolving, and you should consult with competent legal counsel before relying upon or using any informational materials provided to you.

HAWAII CONSTRUCTION INDUSTRY SAMPLE COVID-19 JOBSITE POLICY

This policy is intended to prevent the introduction and spread of coronavirus (COVID-19) at construction jobsites and applies to anyone accessing a jobsite including, but not limited to employees, subcontractors, vendors, visitors, union representatives, and clients. The COVID-19 public health emergency is rapidly evolving and, as such, this plan is subject to change and shall be interpreted in a manner that is consistent with and in the furtherance of the orders and guidance of federal, state and local officials.

INFECTION CONTROL MEASURES

Active Screening

Active screening of workers, as a requirement to entering the jobsite, may be conducted before the start of each shift at the entrance of the project site. Active screening is to continue throughout the day, as necessary, for individuals seeking access to the jobsite. A supervisor or company designated individual shall be present on the jobsite to enforce COVID-19 policies.

Active screening involves the inquiry by an employer into an employee's medical status. The EEOC recognizes the screening need as permissible given the current pandemic circumstances. The ADA places restrictions on the inquiries an employer may make into an employee's medical status, however, it is recognized that there is a need to identify an employee's health status to identify signs and symptoms of exposure. It is important to note that **a person may be infected with the COVID-19 coronavirus without exhibiting recognized symptoms.**

Active screening will permit people into the project site only if they are determined as "No Identifiable Risk." This may be achieved by administering a brief questionnaire to all individuals outside the site entrance. A sample COVID-19 Health Assessment Questionnaire accompanies this policy.

Active Screening Process with COVID-19 Health Assessment Questionnaire:

- Individuals waiting on and going through the active screening process must maintain at least 6 feet distance from other people.
- The assigned screener shall review the questions on the COVID-19 HEALTH ASSESSMENT QUESTIONNAIRE with the individual being screened, while maintaining at least 6 feet distance from the individual.
- If a person answers 'Yes' to any of the questions, ask them to leave the workplace or jobsite immediately and seek medical evaluation.
- If "No" is answered to all of the questions, the person may proceed onto the jobsite.
- If a person refuses to be screened, the person may not proceed onto the jobsite.

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Alternative Active Screening

- A company and/or employer may choose to implement jobsite active screening without the use of written assessment forms. Other options include signage at the jobsite entrance requiring all those seeking access to the jobsite to affirm “No” to all questions before access is granted.
- A company and/or employer may choose to take the temperatures of those seeking access to a jobsite. If you choose to monitor temperatures, please follow and comply with manufacturer guidelines and best practices as set forth by the CDC and EEOC.

Good Personal Hygiene Practices

Always incorporate good personal hygiene practices on every jobsite.

- Hand washing facilities and/or hand sanitizers are to be provided in easily accessible locations on the jobsite. Frequent and thorough hand washing (with soap and water for at least 20 seconds) should be required, at minimum, anytime workers touch their face, face mask, cough, sneeze, use the restroom, and before eating or drinking.
- Where access to running water for hand washing is infeasible, workers should be provided and use a hand sanitizer containing at least 60% ethyl alcohol.
- Avoid touching your eyes, nose, and mouth as this is the route of entry for the virus into your body.
- Practice good respiratory hygiene by covering your cough or sneeze with a tissue, then throwing the tissue in the trash. If a tissue is not available, use the inside of your elbow. Immediately wash your hands with soap and water for at least 20 seconds. If soap and water are not readily available, clean your hands with a hand sanitizer containing at least 60% ethyl alcohol.
- Workers must stay home if they are sick. Workers are reminded to keep in touch with the company while they are out regarding the status of their health.

Worker Safety

- Workers are encouraged to follow COVID-19 precautionary measures such as hand washing, avoiding contact with other workers, and good personal hygiene practices before they access the jobsite and after they leave the jobsite.
- Workers are to avoid close contact with others by maintaining social distancing of 6 feet for less than 10 minutes where practical.
 - The State of Hawaii Emergency Order (2020-02) mandates social distancing of 6 feet for construction where feasible. Where this is infeasible (physically or practically impossible), workers are to wear cloth/fabric face masks and other appropriate personal protective equipment as identified by their supervisor, which complies with COVID-19 practices.
- Workers are to avoid ride-sharing where the separation of six feet not achievable.
- Workers are to avoid congregating in groups of more than 10 people (this includes meetings, meals, breaks, etc.) and are to maintain social distancing.
- In addition to other personal protective equipment (PPE), every person on the jobsite must wear safety glasses or a face shield, at minimum.

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- Cloth/fabric face coverings are not respirators and are intended to slow the spread of the virus and help people who may unknowingly have the virus from transmitting it to others. Cloth face covering should:
 - Fit snugly but comfortably against the side of the face;
 - Be secured with ties or ear loops;
 - Include multiple layers of fabric;
 - Allow for breathing without restriction; and
 - Be able to be laundered and machine dried without damage or change to shape.
- N95 filtering facepieces (respirators) or other air purifying respiratory protection are regulated by OSHA and should be reserved for work which requires the use of such protection. Mandated use of N95 respirators or greater requires compliance with the 29 CFR 1910.134 Respiratory Protection Standard.
- Workers are encouraged to limit the need for the use of N95 filtering facepiece respirators by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
 - If N95 filtering facepieces are provided for use by employees on a voluntary basis, the supervisors must notify the employee of the criteria contained in 29 CFR 1910.134 Appendix D: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppD>. This should be documented.
- No sharing of PPE is allowed.
- The sharing of tools and/or equipment is limited to an as-needed basis only. Tools or equipment which is shared must be sanitized using an EPA approved COVID-19 disinfectant prior to and after use.
- Personal tools are not allowed in gang boxes. All company-provided tools stored within the gang boxes must be sanitized using an EPA approved COVID-19 disinfectant prior to and after use.

Cleaning and Disinfecting

- Clean AND disinfect frequently touched surfaces.
- If surfaces are dirty, clean them with detergent or soap before disinfecting.
Note: When choosing cleaning chemicals, use EPA approved disinfecting products and follow the directions for use. All cleaning chemicals shall be included in the MSDS records on the jobsite.

Food, Beverage and Ice Handling

- Remove all common (Igloo, etc.) water jugs from the jobsite.
- Workers are encouraged to bring their own personal water containers for their personal use only. Bottled water will be provided as appropriate.
- Workers are to label all drinking bottles with their name to avoid sharing.
- The use of ice machines on the jobsite is discouraged. If ice machines will be used, the following policies are to be followed:
 - Access will be limited to before the start of shift(s) and at lunch break.
 - The ice machine will be locked when not in use.
 - The company will designate Authorized Person(s) to dispense ice. Authorized Person(s) must be free of symptoms or sickness.

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- Authorized Person(s) are to use disposable, sanitary gloves when dispensing ice and use processes to void cross-contamination while dispensing ice.
- An ice scoop is to be used for dispensing ice. The Authorized Person is responsible to ensure the ice scoop is cleaned and stored properly after each use.
- If the Authorized Person(s) dispensing ice becomes symptomatic or ill, drain, clean, and disinfect the ice machine before further use.
- Remind workers there is no sharing of food or drink on the jobsite.
- Reinforce good hygiene practices before and after eating.
- Eating areas should be cleaned after each use.
- Eating group sizes are to be limited to 10 or less persons spaced 6 feet apart.

CLEAN JOBSITE CHECKLIST

As part of your regular cleaning and disinfection of your jobsite, use this checklist to focus on the following areas as applicable to your project:

- Schedule frequent cleaning and disinfection of portable toilets. Recommended ratio for workers to portable toilets is 1:10.
- Ensure eating areas are cleaned after each group.
- Provide disinfecting wipes/sprays so tools and/or equipment that must be shared can be cleaned/disinfected between uses.
 - Sanitation/Disinfection wipes/sprays should be provided in each piece of shared equipment for workers to clean/sanitize before and after use, including controls, seats, seatbelts and other high-frequency touched surfaces associated with operation of the equipment.
- Establish cleaning protocols and schedules in high-contact work spaces.
- Provide additional tools, equipment, PPE, signage to ensure potentially infected areas can be cleaned thoroughly and safely. This includes, but is not limited to:
 - Barrier tape, stanchions, cones, or other temporary barricading methods.
 - Disposable gloves.
 - Respirator and/or face shield.
 - Protective clothing (i.e. Tyvek suit).
 - Consult OSHA guidelines for use of personal protective equipment.
- Disinfect/sanitize all common or high traffic areas including, but not limited to:
 - Handrails
 - Gang box handles and locks
 - Storage room/container door handles and locks
 - Doorknobs
 - Lunch areas
 - Other shared/common areas
 - Restrooms
- Disinfect all packages and supplies arriving to project sites. This does not include large deliveries, such as major equipment.
 - To the extent practicable, delivery personnel should remain in their vehicles.
 - Keep all packages outside upon arrival.

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- Use disposable nitrile/latex gloves when handling packages.
- Disinfect all boxes and contents using an EPA-approved disinfecting product, including the outside of shipping boxes and any internal shipping boxes.
- Remove the contents of all boxes and disinfect using the disinfectant spray.
- Immediately place all parts, supplies, and other contents where they belong.
- Place all packaging material in a trash bag and place them outside.
- Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers. Jobsite trailers should be disinfected at least once per day.
- Trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- When employees perform construction and maintenance activities within occupied homes, office buildings, and other establishments, these work locations present unique hazards with regards to COVID-19 exposures. All such workers should evaluate the specific hazards when determining best practices related to COVID-19.
 - During this work, employees must disinfect the work areas upon arrival, throughout the workday, and immediately before departure.
 - Employees should remind other occupants to keep a personal distance of 6 feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.

To Disinfect

Refer to the EPA List N: Disinfectants for Use Against COVID-19 <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

- Diluting your household bleach:
 - To make a bleach solution, mix:
 - 5 tablespoons (1/3 cup) bleach per gallon of water
 - OR
 - 4 teaspoons bleach per quart of water
 - Follow the manufacturer's instructions for application and proper ventilation. Verify that the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.
- Alcohol solutions:
 - Ensure solution has at least **60% ethanol** or **70% isopropyl** alcohol.
- Other common EPA-registered household disinfectants:
 - Products with EPA-approved emerging viral pathogen claims are expected to be effective against COVID-19 based on data for harder to kill viruses. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method, and contact time, etc.).

EXPOSURE/POTENTIAL EXPOSURE PROTOCOLS

In the event of a suspected or laboratory-confirmed case of COVID-19 on the project, please follow these additional guidelines, as established by the CDC, to protect, clean and disinfect your jobsite:

- Potentially Infected/Infected Worker
 - Isolate the potentially infected or infected worker from others until he/she can depart from the jobsite.
 - Provide the potentially infected or infected worker with a respirator, if available, to prevent additional exposure to others.
 - Any employee interacting with a potentially infected or infected worker must wear an N95 respirator, if available. Consult OSHA guidelines for use of respirator equipment.
 - Workers who have had **close contact (within 6 feet for about 10 minutes)** with the potentially infected or infected worker within the past 14 days need to leave the site and take measures to self-isolate for 14 days **in accordance with current CDC guidelines.**
 - If no symptoms occur over 14 days, the worker may return to work; the worker must call to check in with their supervisor before returning to the jobsite.
 - If the worker develops COVID-19 or flu-like symptoms during isolation, direct the worker to seek medical evaluation and self-isolate for 14 days. Do not allow the worker to return to work until they have been fever-free (without the aid of medication) for 72 hours prior to the return from self-isolation **in accordance with current CDC guidelines.**
 - Identify personnel who had close contact with the worker and notify them of their potential exposure to COVID-19, without releasing the person's name.
 - Workers who have not had close contact with the infected worker within the past 14 days can continue working **in accordance with current CDC guidelines**, unless:
 - They develop flu-like symptoms or symptoms of COVID-19. If symptoms develop, direct worker to leave immediately and take measures to self-isolate for 14 days **in accordance with current CDC guidelines.**
 - Identify personnel who had close contact with the worker and notify them of their potential exposure to COVID-19, without releasing the person's name.
- Site/Areas
 - Assess the areas visited and occupied by the potentially infected or infected worker and temporarily close off those areas.
 - Determine if the project site can remain open or whether a temporary shutdown is necessary to clean/disinfect if the risk of spreading the virus is unknown or uncertain.
 - Use appropriate PPE – disposable gloves and gowns, respirator/face shield.
 - Post appropriate signage and/or barricades as necessary.
 - Wait 24-72 hours, if possible, before cleaning and disinfecting to minimize potential for exposure to respiratory droplets.
 - Open outside doors and windows (if any) to increase air circulation in the area.
 - Clean and disinfect all areas used by the potentially infected or infected worker, focusing on frequently touched surfaces.

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Social Distancing

Social distancing of at least 6 feet is required where possible. Some suggestions to achieve this are:

- Control jobsite access to ensure completion of the Illness/Health Assessment prior to start of work.
- Toolbox talks and foreman meetings shall be conducted in smaller groups to meet the 10-person limit while maintaining 6 feet distance between individuals. If meetings are conducted in-person, attendance will be collected verbally and the meeting leader will sign-in each attendee, to avoid sharing pens. Attendance will not be tracked through passed-around sign-in sheets or mobile devices.
- Hold multiple small stretch and flex sessions to keep group size to less than 10 people, spaced 6 feet apart.
- To the extent practicable, stagger lunch periods, project start/arrival and end times.
 - Note: Union contractors should consult their current Collective Bargaining Agreements to avoid violating contractual obligations.
- Create separation plans so multiple crews maintain required 6 feet spacing and eliminate trade stacking of work in same location (i.e., one subtrade per floor).
- Ensure adequate restroom and handwashing facilities are available.
- Provide safe distance floor/ground markings where people congregate (i.e., restrooms, wash stations, etc.).
- Implement administrative controls where social distancing cannot be achieved.
 - For example, additional controls for hoists may include, but are not limited to:
 - Limit the max number of occupants.
 - Limit the number of stops made (every third floor; ground, fourth, seventh, etc.).
 - Limit gate opening/closing to hoist operator.
 - Increase cleaning and disinfecting schedules of hoist.
 - Provide additional PPE to lift operators (fabric/cloth face cover face shield, disposable gloves, etc.).
 - For concrete pours, require additional PPE, such as fabric/cloth face cover, face shields, gloves, etc.

Report all illnesses, absences, or potential exposures to the Safety Department and your direct supervisor. Consult OSHA and CDC guidelines for definitive best jobsite practices/mandatory requirements: <https://www.osha.gov/Publications/OSHA3990.pdf> and <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

Nothing contained in this policy shall be interpreted to guarantee or assure the health, safety or wellbeing of anyone entering the jobsite, or that the jobsite will be free of COVID-19. In no event shall this document give rise to an independent cause of action or provide any additional personal or governmental rights or liabilities.

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COVID-19 HEALTH ASSESSMENT QUESTIONNAIRE

To be administered daily before allowed entry to site. Please use your own pen to complete the questionnaire.

_____ (Company) is committed to maintaining a safe workplace for everyone. In light of the recent Coronavirus (COVID-19) developments, effective immediately, access to the worksite is limited. Only individuals who complete and pass active screening requirements are permitted access.

PROCEED HOME IF YOU:

- Are experiencing problems breathing, have a cough or fever.
- Develop these symptoms while on site. REPORT THIS TO YOUR SUPERVISOR IMMEDIATELY.
- Answer 'Yes' to any of the questions below.

If you are experiencing symptoms (cough, fever, or shortness of breath), you must be isolated for 14 days after the onset of symptoms. After 14 days, it is only safe to leave isolation if your symptoms are improving and you don't have a fever for 72 hours immediately prior to the end of your isolation. Isolation may be longer for individuals who have more severe illness.

1. Are you currently experiencing a fever (100.4 F or 38.0 C or above) OR symptoms of lower respiratory illness such as cough, shortness of breath, or difficulty breathing?
 Yes No Comment _____
2. Have you had a fever (greater than 100.4 F or 38.0 C) OR symptoms of lower respiratory illness such as cough, shortness of breath, or difficulty breathing in the past 14 days?
 Yes No Comment _____
3. Have you, or anyone in your family, come into close contact (within 6 feet for longer than 10 minutes) with someone who has a suspected or confirmed COVID – 19 diagnosis in the past 14 days either at home or on a jobsite, etc.?
 Yes No Comment _____
4. Have you traveled outside of Hawaii in the past 14 days?
 Yes No Comment _____

Privacy Notice: Any information provided in this questionnaire will be kept confidential and used for purposes of preventing the spread of COVID-19.

Print Name: _____ Signature: _____

Employer: _____

Date: _____

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