

	Safety & Health Program	Issue Date:
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Title: CORVID-19 Risk Management Plan		Revision #:

PURPOSE

This risk control plan has been developed to protect our employees, protect our customers, protect our subcontractors, and prevent/minimize the spread of coronavirus disease 2019 (COVID-19) at our office, shop, and project locations. In addition to the general guidance within this Plan, specific jobsites may be subject to additional measures.

Important - This risk control plan has been developed based on what is currently known about COVID19. The Centers for Disease Control and Prevention (CDC), NYS Department of Health (NYSDOH), Erie County Department of Health (ECDOH), and OSHA are updating and providing information as it becomes available and it is imperative that all communications have a date and time listed.

SCOPE

This plan applies to all company employees both in the office and on our projects. This plan also applies to suppliers or subcontractors working at our facility and on our projects.

RISK ASSESSMENT

COVID 19 has been confirmed in our community. People in NYS and Erie County where ongoing community spread of the virus that causes COVID-19 has been reported are at elevated risk of exposure, with the level of risk dependent on the location. As of March 20, 2020 NYS enacted the "New York State on PAUSE" executive order, a 10-point policy to assure uniform safety for everyone. It includes a new directive that all non-essential businesses statewide must close in-office personnel functions effective at 8PM on Sunday, March 22.

The **NYS Executive Order 202.6 "New York State on PAUSE"** permits Essential Business to remain operating during this time. Construction has been determined to be an Essential Business under the executive order. Essential Businesses must continue to comply with the guidance and directives for maintaining a clean and safe work environment issued by State and Local Departments of Health.

COVID-19 is a new disease and there is limited information regarding risk factors for severe disease. Based on currently available information and clinical expertise, older adults and people of any age who have serious underlying medical conditions are at higher risk for severe illness from COVID-19. Some recent review of data has noted an increased risk of younger aged individuals experiencing more severe symptoms and cases.

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GENERAL INFORMATION

Coronavirus disease 2019 (COVID-19) is a respiratory illness that can spread from person to person.

COVID-19 is spreading from person to person. It is communicable. The virus is thought to spread mainly between people who are in close contact with one another (within 6 feet) through respiratory droplets produced when an infected person coughs or sneezes. It may also be possible to get COVID-19 by touching a surface or object that has the virus on it and then touching your mouth, nose or possibly eyes. Current reporting has indicated that the COVID-19 virus can live on different surfaces from hours to days.

SYMPTOMS OF COVID-19

Patients with COVID-19 have experienced mild to severe respiratory illness with symptoms of:

- Fever (100.4° F or greater)
- Cough
- Shortness of Breath.

It is thought that symptoms may appear 2– 14 days after exposure. COVID-19 appears to be most communicable when persons are exhibiting symptoms. See Symptoms Poster Appendix A.

The majority of the population that contracts COVID-19 will experience mild to moderate symptoms similar to the Flu. For others, especially those at higher risk, severe complications from this virus include pneumonia in both lungs, multi-organ failure and in some cases death.

HIGHER RISK INDIVIDUALS

Early information shows that some people are at higher risk of getting very sick from this illness. Higher risk individuals include:

- Older adults
- People who have serious chronic medical conditions, such as:
 - Heart disease,
 - Diabetes,
 - Lung disease.

Higher risk individuals should pay attention for potential symptoms (listed above). If a higher risk individual develops severe symptoms of

COVID-19 (see below) they should immediately consult with their medical provider via telephone or call 911:

- Difficulty breathing or shortness of breath;
- Persistent pain or pressure in the chest;
- New confusion or inability to arouse;
- Bluish lips or face.

Important Note – This list is not all inclusive

CONTROLS - SOCIAL DISTANCING MEASURES

To slow the spread of COVID-19 through U.S. communities, the CDC, NYSDOH & ECDOH have encouraged individuals to practice “social distancing” measures. Social distancing is a public health practice that aims to prevent sick people from coming in close contact with health people in order to reduce opportunities for disease transmission. It includes large-scale measures such as canceling group events, closing public spaces, avoiding crowds, and maintaining a recommended distance between person to person.

Per CDC, DOH, and **NYS Executive Order 202.6 “New York State on PAUSE”** the Company mandates the following social distancing measure at all of our locations and projects:

1. Maintain 6 feet of distance between each other. Whenever possible and it is SAFE to do so, employees shall remain 6 feet or more from each other while performing their work.
2. Work group size shall be limited to the number of employees required to safely perform the task.
3. Work locations shall be coordinated between all contractors at the project, owners, clients, etc. to avoid contact with others.
4. When required work shifts shall be staggered to limit exposure.
5. Company employees and subcontractors shall remain as isolated as possible; coordinate breaks and lunch times and locations to keep an adequate distance from each other.
6. Non-essential visitors shall not be allowed at our office or on our project sites. Examples of essential visitors include safety personnel, government agencies, etc.
7. Suppliers and vendors that are delivering material, equipment, etc. shall be informed to not send a sick driver.
8. Non-essential gatherings of individuals of any size for any reason (e.g. parties, celebrations or other social events) are canceled or postponed at this time
9. Employees shall refrain from practices such as handshakes or hug when greeting others.

CONTROLS – ACCOUNTABILITY

The main office will keep a daily roster of all essential visitors to the company. The roster shall contain the name of the driver/supplier, company name,

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direct contact phone number, time in/out.

Job site General Contractors are now requiring a daily log of workers at each project. The log must contain the employee name, company name, direct contact phone number, time in/out, and area worked on the project that day. Raken Daily Report will be used for this submission.

CONTROLS – SCREENING

The Company reserves the right to perform daily temperature screening of essential employees, essential subcontractor workers, and essential visitors entering our facility.

CONTROLS - EMPLOYEE ILLNESS POLICY

The following serve as Company protocols for the handling employee or subcontractor worker report and/or observation of illnesses. These protocols will remain in effect until further notice. In addition to the protocols outlined below, all orders and directives provided by project general contractors, project owners, and NYSDOH/NYSDOH shall be implemented.

General Guidelines

- Workers who have symptoms of COVID-19 are required not report to the work. Symptoms include fever of 100.4° F or greater, cough, and/or shortness of breath. Company employees must notify their supervisor via telephone. Do not report to work.
- If an employee experiences the start of COVID-19 type symptoms while at work, they must immediately report them to their supervisor, and leave work. The supervisor or foreman must be immediately notified.
- Workers who have symptoms of COVID-19 or with confirmed COVID-19 must remain off work until they are free of fever (100.4° F) or greater using thermometer for at least 72 hours, without the use of fever-reducing or other symptom-altering medicines (e.g. cough suppressants).
- A healthcare provider's note is not required for company employees or subcontractors who are sick with acute respiratory illness to validate their illness or to return to work. We understand that healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way.

Employee Reports COVID-19 Symptoms

- If an employee or subcontractor employee claims to have symptoms such as fever, cough, or shortness of breath instruct them to leave the project site immediately and advise them to call their medical provider for guidance. Report this to the supervisor or foreman immediately.
- The employee's supervisor shall ask the employee to provide a list of all known individuals at the project location or work place which they have had close contact with over the previous 14 days. Close contact is defined as working within 6 feet or less. This list will be

provided to the office.

Employee Appears Ill but Denies Being Ill

- If an employee or subcontractor employee is displaying symptoms such as fever, cough, or shortness of breath (or is reported by others to display such symptoms) but denies having such symptoms and will not leave the jobsite voluntarily, instruct the employee that they must leave the jobsite. The employee will not be permitted to return until they show no signs of illness or fever (100.4 or greater), without the use of a fever reducing medicine, for 72 hours or provide evidence they can return from a licensed health care provider.

Employee Reports Having Close Contact with Confirmed COVID-19 Case

- If an employee or subcontractor employee has had close contact with an individual who has a confirmed positive test result for COVID-19, instruct the employee to stay home or leave the work immediately. The employee will not be permitted to return to work until they have been symptom-free for 14 days from the last date of contact or provide evidence of a negative test for COVID-19.
- The employee's supervisor shall also ask the employee to provide a list of all known individuals at the work location which they have had close contact with over the previous 14 days. Close contact is defined as working within 6 feet or less. This list will be provided to the office.

Employee Reports Testing Positive for COVID-19

- If an employee or subcontractor employee voluntarily informs a supervisor they have tested positive for a COVID-19 infection, the supervisor must confidentially report it to the office immediately.
- The employee's supervisor shall instruct the employee they are not permitted to return to work until they can provide evidence of a negative test for COVID-19 or are released from isolation by their County DOH.
- The employee's supervisor shall also ask the employee to provide a list of all known individuals at the work location which they have had close contact with over the previous 14 days. Close contact is defined as working within 6 feet or less. This list will be provided to the office.
- If an employee or subcontractor employee is confirmed to have COVID-19 infection at a work, the company will inform individual identified workers who had close contact with the employee of their possible exposure to COVID-19 in the workplace. The company will work with the local Department of Health in notifying workers. The Company will maintain confidentiality as required by the Americans with Disabilities Act (ADA). The individual workers should then self-monitor for symptoms (i.e., fever, cough, or shortness of breath) and follow local County DOH recommendation.
- In the unlikely case the infected employee has reported to work (County DOH would mandatory quarantine or isolate employee upon positive test) instruct the employee that they must leave work immediately and will not be permitted to return until they can provide evidence of a negative test for COVID-19 or a sufficient amount of time to recover has passed (14 days) and they show no signs of illness or fever

(100.4 or greater), without the use of a fever reducing medicine, for 72 hours. Report this to the office immediately.

Essential Employee Option

Per **NYS Executive Order 202.6 “New York State on PAUSE”**, The company reserves the right to enact Essential Employee Work/Return to Work Guidelines, as delineated by the Erie County DOH. These guidelines permit essential employers to allow employees exposed to or recovering from COVID-19, to work under the following conditions:

- Employees who have been in contact with confirmed or suspected COVID-19 cases who are without symptoms (asymptomatic) should continue to work. Employees who are asymptomatic contacts of confirmed or suspected cases should self-monitor twice a day (temperature, symptoms), and undergo temperature monitoring and symptom checks at the beginning of each shift and at least every 12 hours.
- If employees who are asymptomatic but have contact with a potential COVID-19 case develop symptoms consistent with COVID-19, they should immediately stop work and isolate at home. All employees with symptoms consistent with COVID 19 should be dealt with as if they have this infection regardless of the availability of test results.
- Employees with confirmed or suspected COVID-19 who have maintained isolation for at least 7 days after illness onset and have been at least 72 hours fever-free (without medication) and with other symptoms improving may return to work.

CONTROLS - SICK LEAVE

In response to the outbreak of COVID-19 in NYS, Governor Andrew M. Cuomo has guaranteed workers job protection and financial compensation in the event they, or their minor dependent child, are subject to an order of mandatory or precautionary quarantine or isolation issued by the state of New York, the Department of Health, local board of health, or any government entity duly authorized to issue such order due to COVID-19. Most employees will get financial compensation by using a combination of benefits. These benefits are not available to employees who are able to work through remote access or other means.

Paid Family Leave can also be used to care for a family member with a serious health condition.

CONTROLS - TRAVEL

General All Company work related travel outside

WNY is suspended.

Employee has Recently Traveled to NYC or Outside the Country

- If an employee has traveled to a Level 3 country listed on the CDC watch/alert list (China, Hong Kong, Iran, South Korea, and Italy) within the last 14 days, they must leave work immediately or should be instructed to stay home. This applies regardless of whether the employee is displaying symptoms such as fever, cough, or shortness of breath, or has tested positive for COVID-19.
- The employee will not be permitted to return to work until they have been symptom-free for 14 days from the date they departed from that location.
- If an employee has had close contact with the traveling individual, that employee should follow the same precautions listed above for employees who have had close contact with an individual who has a confirmed positive test result for COVID-19.

CONTROLS - HYGIENE PRACTICES

Employees and subcontractors are expected to follow these hygiene practices:

- Cover nose and mouth with a tissue when coughing or sneezing (or an elbow or shoulder if no tissue is available). Wash hands as soon as possible after.
- Wash hands prior to:
 - Preparing food,
 - Eating or drinking,
 - Smoking,
 - Treating a cut or wound,
 - Applying cosmetics, chap stick or sunscreen,
 - After blowing your nose, coughing or sneezing,
 - After touching garbage,
 - After using the toilet, and
 - After touching shared or frequently touched items.
- Wash hands with soap and water for at least 20 seconds. Scrub front and back, under finger nails, nail beds and in between fingers. Rinse thoroughly. Refer to Appendix B for Hand Washing Steps. If soap and water is not available, use hand sanitizer.
- Washing hands with soap and water is the preferred method, however when not readily available use an alcohol-based hand sanitizer that contains at least 60% alcohol. Hand sanitizer should be applied to all surfaces of the hand including nail beds until dry, this should take about 20 seconds.
- Do not touch your face, eyes, nose or mouth.
- Do not take your phone with you to the restroom or leave it in a pocket or bag; do not touch your phone while eating. Disinfect your phone / phone case frequently.
- Do not share any office supplies or personal protective equipment: Safety glasses, respirators, harness, gloves, etc.
- Sharing respirators and gloves is strictly forbidden.

CONTROLS - SANITATION & CLEANING PROCEDURES

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Current evidence suggests that novel coronavirus may remain viable for hours to days on surfaces made from a variety of materials. Routinely cleaning and disinfecting frequently touched surfaces is a best practice measure for prevention of COVID-19 and other viral respiratory illnesses in community settings. Routinely clean and sanitize all frequently touched surfaces in the workplace:

Office

- Clean and disinfect door handles/knobs, table/desk tops, chair arms, workstations, kitchen countertops, faucet handles, toilet seats and flush handles, glass windows, drawer and filing cabinet handles, and if sharing of office supplies is absolutely necessary, disinfect between uses.

Project Sites

- Clean and disinfect door handles/knobs, plan table surfaces, break table surfaces, desks, handles to heavy equipment, handles to job boxes, doors handles to portable bathrooms, windows, ladder and stair rails, elevated work platform controls, heavy equipment controls, steering wheels, work tables, shared hand and power tools.
- If sharing of personal protective equipment is required, then disinfect in between uses.
- Sharing respirators and gloves is strictly forbidden.

Cleaning Surfaces

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective.
- Diluted household bleach solutions can be used if appropriate for the surface. Follow manufacturer's instructions for application and proper ventilation. Check to ensure 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.
- Prepare a bleach solution by mixing:
 - 5 tablespoons (1/3rd cup) bleach per gallon of water or
 - 4 teaspoons bleach per quart of water
- Products with EPA-approved emerging viral pathogens 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.).
- For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces. After cleaning:

- If the items can be laundered, launder items in accordance with the manufacturer’s instructions using the warmest appropriate water setting for the items and then dry items completely.
- Otherwise, use products with the EPA-approved emerging viral pathogens claims that are suitable for porous surfaces
- Linens, Clothing, and Other Items That Go in the Laundry
- Do not shake dirty laundry; this minimizes the possibility of dispersing virus through the air.
- Wash items as appropriate in accordance with the manufacturer’s instructions. If possible, launder items using the warmest appropriate water setting for the items and dry items completely. Dirty laundry that has been in contact with an ill person can be washed with other people’s items.
- Clean and disinfect hampers or other carts for transporting laundry according to guidance above for hard or soft surfaces.

MORE INFORMATION

For more information and updates regularly monitor:

NYS State DOH COVI D-19 <https://www.health.ny.gov/diseases/communicable/coronavirus/>ERIE County Department of Health

COVID-19 <http://www2.erie.gov/health/coronavirus> CDC COVI D-19 <https://www.cdc.gov/coronavirus/2019-ncov/index.html>