



GDPM Planning & Development Related Construction Projects

COVID-19 Exposure Prevention, Preparedness, & Response Plan

GDPM takes the health and safety of our tenants, employees and contractors very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. This is particularly true for the construction industry, which has been deemed “essential” in many locations including Dayton, Ohio. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan.

This Plan is based on currently available information from the CDC, OSHA, the State of Ohio, and Montgomery County Health Department and is subject to change based on further information provided by the CDC, OSHA, and other public officials. GDPM may also amend this Plan based on operational needs.

This Plan does not constitute legal advice and should not be construed on its own as fulfilling a contractor’s/subcontractor’s (“contractors”) overall obligations to ensure a safe and healthy work environment. Contractors should also consult with state and local ordinances regarding work in the Montgomery County, Ohio area. As the COVID-19 outbreak develops, the information and recommendations contained in this document may change and thus, contractors should continue to monitor developments in the area. Contractors are responsible for the health and safety of their workers and are encouraged to adopt and maintain any supplemental practices or policies that they believe necessary or advisable to safeguard their employees and subcontractors from the threat of COVID-19.

I. Responsibilities of Superintendents and Project Managers

The jobsite Superintendents and Project Managers must be familiar with this Plan and be ready to answer questions from contractors and their employees. The jobsite Superintendent and/or Project Manager must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. The Superintendent and/or Project Manager must require this same behavior from all contractors, employees and subcontractors. Failure to strictly adhere to the requirements of this plan will result in disciplinary action including written warnings, suspension, discharge, or termination of a contract.

II. Responsibilities of Contractors

For the purposes of this plan, the term contractor includes contractors and their employees, agents, and invitees, and subcontractors and their employees, agents, and invitees. It is the responsibility of the contractor directly contracted with GDPM to perform a task to disseminate copies of this plan and/or the information contained herein to their employees, agents, invitees and to their subcontractors and their employees, agents and invitees.

We are asking every one of our contractors to help with our prevention efforts while at GDPM jobsites. In order to minimize the spread of COVID-19 at our jobsites, we all must play our part. As set forth below, GDPM has instituted social distancing, and other best practices at our jobsites. All contractors must strictly follow these practices. In addition, contractors are expected to report to the jobsite Superintendent and/or Project Manager if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask the Superintendent, Project Managers and / or GDPM's Sr. Manager of Planning & Development.

OSHA and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.
- Avoid touching other workers on or off of the jobsite.

- Practice social distancing by maintaining at least a six foot distance from others on the jobsite to the extent possible.

In addition, contractors must familiarize themselves with the symptoms of COVID-19:

- Coughing;
- Fever of 100.4 degrees Fahrenheit or higher;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

III. Jobsite Protective Measures

GDPM has instituted the following protective measures at all jobsites.

General Safety Policies and Rules

- Any GDPM Planning & Development construction manager/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home. GDPM requests that all construction managers/contractors/visitors take their own temperatures prior to coming to the worksite, and verify temperature is below 100.4 degrees Fahrenheit at sign in. As an alternative, GDPM may determine that taking construction manager/contractor/visitor temperatures at worksites is appropriate and restrict access based upon temperature readings.
- Safety meetings will be by telephone, if possible. If safety meetings are conducted in-person, attendance will be collected verbally and the project manager/superintendent will sign-in each attendee. During any in-person safety meetings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.
- Contractors must avoid physical contact with others and maintain personal space of at least six (6) feet, where possible.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone or video conference.

- Contractors should stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- GDPM understands that due to the nature of construction work, access to running water for hand washing may be impracticable. In these situations, contractors must have available and provide alcohol-based hand sanitizers and/or wipes.
- Contractors should adopt protocols to limit the sharing of vehicles, tools, and equipment to the maximum extent possible, and to ensure frequent cleaning of tools, equipment, and frequently touched surfaces. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Contractors should provide employees with personal protective equipment such as gloves, goggles, face shields, and face masks as appropriate for the activity being performed.
- Daily entry screening shall be conducted for all workers and visitors entering the worksite, using the questionnaire provided as Appendix A.

Workers entering Occupied Building and Units

- When contractors perform construction and maintenance activities within occupied units, it presents unique hazards with regard to COVID-19 exposure. All contractors should evaluate the specific hazards when determining best practices related to COVID-19.
- During this work, contractors must sanitize the work areas upon arrival, throughout the workday, and immediately before departure.
- The contractor should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.
- Face coverings, gloves, and other PPE must be worn at all times.
- Face coverings should be provided to the tenants.

Jobsite Visitors

- The number of visitors to the jobsite, will be limited to only those necessary for the work.
- All visitors will be screened upon arriving on the jobsite, using the questionnaire provided as Appendix A. If the visitor answers “yes” to any question, he/she should not be permitted to access the jobsite.
- Site deliveries will be permitted but should be properly coordinated in line with minimal contact protocols. Delivery personnel should remain in their vehicles if at all possible.

Personal Protective Equipment and Work Practice Controls

In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), Contractors shall also ensure the following is available for their employees and subcontractors:

- **Gloves:** Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Employees should avoid sharing gloves.
- **Eye protection:** Eye protection should be worn at all times while on-site.
- **Face shields or masks:** Face shields or masks are required to be worn at all times while on-site.

Face Coverings

Face coverings are required on the jobsite. A face covering is a cloth, bandana, or other type of material that covers a person's nose and mouth. The CDC lists five criteria for "cloth face coverings": the 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.

Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan.

IV. Jobsite Exposure Situations

Contractor Exhibiting COVID-19 Symptoms

If a contractor (including contractor workers) exhibits COVID-19 symptoms, they must remain at home (or off-site) until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). GDPM will similarly require a contractor that reports to work with symptoms to leave the jobsite until they are symptom free for 72 hours (3 full days).

Contractor Tests Positive for COVID-19

A contractor that tests positive for COVID-19 must alert the Superintendent and/or Project Manager and will be directed to not enter the jobsite. Any contractor who becomes aware of a

workers positive COVID-19 case must immediately alert the jobsite Superintendent and/or Project Manager. Contractors that test positive may return to the jobsite when at least fourteen (14) days have passed since the date he or she has been symptom free, and have not had a subsequent illness.

Contractor Has Close Contact with a Tested Positive COVID-19 Individual

Contractors that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to either: (1) continue to work, provided they remain asymptomatic; or, if they are symptomatic or GDPM chooses to follow more conservative protocols, (2) self-quarantine for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time. If a contractor learns that he or she has come into close contact with a confirmed-positive individual outside of the jobsite, he/she must alert the superintendent and/or Project Manager of the close contact.

V. Confidentiality/Privacy

Except for circumstances in which GDPM is legally required to disclose information, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of a contractor's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of other contractors, tenants, and employees and to detect situations where the potential for transmission may increase. GDPM reserves the right to inform other contractors, tenants, and employees that a contractor (without disclosing the contractor's name) has been diagnosed with COVID-19 if the other contractors might have been exposed to the disease so the contractors, tenants and employees may take measures to protect their own health.

VI. As a Construction Worker, How Can I Protect Myself?

All construction workers shall be provided with the following information.

Potential sources of exposure include having close contact with a coworker or member of the public who is ill with COVID-19 and touching your nose, mouth, or eyes after touching surfaces contaminated with the virus or handling items that others infected with COVID-19 have touched. Actions you should be taking now include the following:

- Don't go to work if you are feeling sick.
- Don't go to work if you have a fever.
- Don't go to work if you have a cough or shortness of breath.
- Avoid contact with sick people.

- Don't shake hands when greeting others.
- Avoid large gatherings or meetings of 10 people or more.
- Stay at least 6 feet away from others on job sites and in gatherings, meetings, and training sessions.
- Cover your mouth and nose with tissues if you cough or sneeze or do so into your elbow.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Bring food and water bottles from home to the job site and do not share.
- Drive to worksites or parking areas by yourself—no passengers or carpooling.
- Clean and disinfect frequently touched surfaces such as shared tools, machines, vehicles and other equipment, handrails, ladders, doorknobs, and portable toilets. Clean and disinfect frequently touched surfaces periodically throughout the shift but also:
 - At the beginning and end of every shift
 - After anyone uses your vehicle, tools, or workstation
- Limit tool sharing if possible.
- Practice proper hand hygiene. This is an important infection control measure. With appropriate hand hygiene. When possible, wash your hands regularly with soap and water for at least 20 seconds or use an alcohol-based hand sanitizer containing at least 60% alcohol. Key times to clean hands include:
 - Before and after work shifts and breaks
 - After blowing your nose, coughing, or sneezing
 - After using the restroom
 - Before eating and before and after preparing food
 - After touching objects which have been handled by coworkers, such as tools and equipment
 - Before putting on and after taking off work gloves
 - After putting on, touching, or removing cloth face coverings
 - Before donning or doffing eye or face protection (safety glasses, goggles, etc.)
- Do not touch your eyes, nose, or mouth.
- Use tissues when you cough, sneeze, or touch your face. Throw used tissues in the trash and wash your hands or use hand sanitizer containing 60% alcohol if a sink to wash your hands is not available.

VII. As a Contractor, How Can I Reduce Transmission Among Workers?

The CDC suggests Contractors implement the following protocols to further reduce workplace transmission:

Maintain Safety Protocols and Information

- Take steps to help prevent the spread of COVID-19 if an employee is sick.
 - Actively encourage sick employees to stay home.
 - Sick employees diagnosed with COVID-19 shouldn't return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments.
- Provide employees with accurate information (in a language they understand) about COVID-19, how it spreads, and risk of exposure.
 - Provide workers with basic facts.
 - Conduct toolbox talks on all job sites to explain the protective measures in place.
- Be aware that some employees may be at higher risk for severe illness. Implement specific policies to minimize face-to-face contact for these employees or assign work tasks that allow them to maintain a distance of at least 6 feet from other workers, customers, and visitors, or to telework if possible.
- Provide training to employees on proper handwashing practices and other routine preventative measures. This will help prevent the spread of many diseases, including COVID-19.
- Provide employees with access to soap, clean running water, and materials for drying their hands, or if soap and water are not readily available provide alcohol-based hand sanitizers containing at least 60% alcohol at stations around the establishment for use by both workers and customers.
 - Place handwashing stations and/or hand sanitizers in multiple locations (including in or adjacent to portable restrooms) to encourage hand hygiene.
- Explore alternative ways to promote hand hygiene if there is difficulty sourcing hand sanitizer and running water is not available on site. Some examples may include:
 - Install temporary or mobile handwashing stations, making sure there is an adequate supply of water, soap, and single-use paper towels.
 - Provide a large (5+ gallon) bucket with a lid and tap that can be used to provide water for handwashing. If this method is used, the water tap should be regularly cleaned and disinfected, and the contaminated wastewater must be collected and treated in

accordance with local laws and environmental regulations. Provide fresh clean water daily.

- Depending on the size or configuration of the job site, there may need to be multiple handwashing stations available to accommodate the workforce while maintaining social distancing, and stations may need to be restocked during the course of the day to maintain adequate handwashing supplies.
- Develop and implement social distancing guidance for the workplace to maintain a distance of at least 6 feet between workers when possible.

Maintain a healthy work environment

- Institute measures to physically separate and increase distance between employees, such as the following:
 - Modify work schedules to stagger work, provide alternating workdays or extra shifts to reduce the total number of workers on a job site at any given time.
 - Restrict access to reduce the number of workers in enclosed and confined areas at one time. Confined and enclosed areas (e.g., trailers, small rooms in buildings under construction) should be identified and access should be restricted to essential personnel only. Enclosed spaces (e.g., toilets, break areas) are potential transmission areas and should be treated accordingly. Time spent in these areas should be minimized.
 - Rearrange administrative area workstations so that workers can stay at least 6 feet away from other workers.
 - Install shields or barriers, such as plexiglass barriers, where possible.
 - Remove or rearrange chairs and tables or add visual cue marks in break areas to support social distancing practices between workers. Identify alternative areas to accommodate overflow volume.
 - Disinfect break or lunchroom areas between each group using the areas.
 - Maintain social distancing when visiting lunch trucks or construction site vendors.
 - Limit casual (social) conversations that normally occur at work.
 - Cancel or postpone in-person meetings/trainings whenever possible. If you must meet, spread out to a distance of 6 feet or more between attendees.
 - Reduce the number of individuals at meetings, including worker orientations, to increase the distance between individuals.
- Conduct a hazard assessment to determine if hazards are present, or are likely to be present, for which workers may need personal protective equipment (PPE). CDC and OSHA have recommended PPE for some types of work activities when engineering and administrative controls cannot be implemented or are not fully protective.

- Employers are required to determine, select, provide, and train on correct PPE use and application for their workers' specific job duties.
- Place posters that encourage staying home when sick, cough and sneeze etiquette, signs and symptoms of COVID-19, and proper hand hygiene practices at the entrance to the workplace and in other workplace areas where they are likely to be seen.
- Provide tissues and no-touch disposal receptacles for employees to use.
- Clean and disinfect frequently touched surfaces. If the surfaces are visibly dirty, clean them prior to disinfecting. To disinfect, use products that meet EPA's criteria for use against SARS-CoV-2^{external icon}, diluted household bleach solutions that are prepared according to the manufacturer's label for disinfection, or alcohol solutions with at least 70% alcohol, and that are appropriate for the surface. Follow manufacturer's directions for use.
 - Clean workspaces and breakrooms at least once per shift or as often as workers change workstations.
 - Provide worker training on manufacturer's directions for disinfectant use and provide workers with any additional PPE required for disinfection.
- Provide disposable disinfectant wipes (when available) so that surfaces commonly touched can be wiped down.
- Follow all applicable local, state, and federal regulations and public health agency guidelines.

Maintain healthy business operations

- Designate a safety and health officer to be responsible for responding to COVID-19 concerns at every jobsite. Workers should know who this person is and how to contact them.
- Implement flexible sick leave and supportive policies and practices. Consider drafting non-punitive emergency sick leave policies if sick leave is not offered to some or all employees. Employers should not require a positive COVID-19 test result or a healthcare provider's note for employees who are sick to validate their illness, qualify for sick leave, or to return to work.
- Provide information on whom to contact if employees become sick. If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA).
- Reach out to local public health officials to establish ongoing communications to facilitate access to relevant information before and during a local outbreak.

Implement a COVID-19 Exposure Control Plan

The Occupational Safety and Health Act requires construction employers to provide a safe and healthy workplace. To do this, construction industry employers should develop a comprehensive COVID-19 exposure control plan, which includes control measures, symptom checking, social distancing, hygiene and decontamination procedures, and training. An

exposure control plan and the following recommendations should be followed before any onsite worker is found to have COVID-19 because many people with COVID-19 are asymptomatic and can potentially spread disease.

To implement a COVID-19 exposure control plan, employers should:

- Designate a site-specific COVID-19 officer at every job site.
- Plan for office staff to have the ability to work from home.
- **Training:** Train workers with the most recent information on the hazard and control measures, including social distancing, handwashing facilities on site, and how high-touch surfaces are disinfected.
- **Screening:** Ask workers to self-identify symptoms of fever, coughing, shortness of breath, chills, muscle pain, headache, sore throat, and new loss of taste or smell each day, before the shift, mid-shift, and at home. Screen all workers for fever at the beginning of shifts and when they become ill on the job. Thermometers must be ‘no touch ’or ‘no contact’.
- Workers with COVID-19 and other workers who have had close contact with those workers should be put on sick leave. Local health departments should be notified. The area where the sick person worked should be immediately disinfected.
- Ensure affected workers receive paid sick leave as required under the Families First Coronavirus Response Act (FFCRA).The U.S. Department of Labor’s poster about paid sick leave under the FFCRA should be posted at the workplace. A copy can be found here: https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA_Poster_WH1422_No_n-Federal.pdf
- **Social distancing:** Implement social distancing procedures:
 - Create at least 6 feet of space between workers by staging/staggering crews.
 - Modify work schedules to stagger work, provide alternating work days or extra shifts to reduce the total number of employees on a jobsite at any given time to ensure physical distancing. The recommendation for shifting individual employees should be at the sole discretion of the Local Business Manager or their Representative.
 - Identify choke points where workers are forced to stand together, such as hallways, hoists and elevators, ingress and egress points, break areas, and buses, and put in place policies to maintain social distancing.
 - In elevators and personnel hoists, ensure six feet distance between passengers in all directions and equip operator with appropriate respirator and other personal protective equipment.
 - Minimize interactions when picking up or delivering equipment or materials. Organize the placement of materials to minimize movement on the work site.

- **Decontamination:** Clean and disinfect high-touch surfaces on jobsites and in offices; such as shared tools, machines, vehicles and other equipment, handrails, doorknobs, and portable toilets, frequently, per CDC guidelines:
 - <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>
 - Make disinfectants available to workers throughout the worksite and ensure supplies are frequently replenished.
- **Personal hygiene:** Provide soap and running water whenever possible on all jobsites for frequent handwashing. If it is not possible to provide running water, disclose the reasons to your workers. Provide alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol as a backup only if providing running water is impossible. Encourage workers to leave their workstations to wash their hands before and after going to the bathroom, before eating, and after coughing, sneezing, or blowing their nose.
- **Respiratory protection:** If workers need to be near each other to perform tasks or when working in close quarters, such as confined space work, they should wear a NIOSH-approved respirator implemented under a full respiratory protection program. NIOSH-approved respirators include filtering face piece and elastomeric negative or positive pressure half or full face piece respirators equipped with N95, N99, N100, R95, P95, P99, or P100 filters.
 - Cloth face coverings are not respirators and do not replace physical distancing or respirators required when workers are in close proximity. However, cloth face coverings should be provided in other circumstances when required or recommended by state or local governments.

Respirator Images:



VIII. General Questions

Given the fast-developing nature of the COVID-19 outbreak, GDPM may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact the jobsite Superintendent and/or Project Manager.

Other Resources Include:

Dayton and Montgomery County Public Health: COVID-19 Updates:
<https://www.phdmc.org/coronavirus-updates>

Ohio Department of Health: Guidance to Reopen Businesses:
<https://coronavirus.ohio.gov/wps/portal/gov/covid-19/responsible-restart-ohio/Sector-Specific-Operating-Requirements/>

NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, April 27, 2020
[https://www.cpwr.com/wp-content/uploads/publications/NABTU CPWR Standards COVID-19.pdf](https://www.cpwr.com/wp-content/uploads/publications/NABTU_CPWR_Standards_COVID-19.pdf)

CDC Information:
[CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019](#)

[CDC Prepare your Small Business and Workers for the Effects of COVID-19](#)

[NIOSH COVID-19 Workplace Safety and Health Topic](#)

[CDC COVID-19](#)

[OSHA COVID-19](#)

Appendix A – Health Screening Questionnaire

Name: _____ Date: _____

Company Name: _____

- 1) Have you been confirmed positive for COVID-19?
 YES
 NO
- 2) Do you have (or have you had in the past 72 hours) a fever of 100.4 degrees Fahrenheit or above?
 YES
 NO
- 3) Do you have (or have you had in the past 72 hours) any acute respiratory illness symptoms (such as fever, cough, or shortness of breath), or digestive symptoms (such as diarrhea, vomiting, or abdominal pain)?
 YES
 NO
- 4) Have you traveled in the last 14 days?
 YES
 NO
- 5) Have you been in close contact with any persons who have been confirmed positive for COVID-19 and are also exhibiting acute respiratory illness symptoms?
 YES
 NO
- 6) Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
 YES
 NO

Any person checking YES to any question may not enter jobsite.