

Restarting Your Construction Operations in the COVID-19 Era

Depending on the project location, construction operations throughout the United States have been ordered to stop or limit work or have been allowed to remain operational. Regardless of the current status of your project jobs, the method in which construction sites will operate in the future has changed significantly. Knowing this "new norm" will require adjustments as your organization may begin phasing workers back into your locations and resuming operations.

What should the construction industry be considering and preparing for in order to get back to business as safely as possible? As you re-open your business, protecting employees, customers, contractors and vendors will be essential.

Construction-specific considerations

Prior to beginning work on a project site that has been temporarily shut down due to the COVID-19 pandemic, contractors should consider implementing the following basic loss control measures to ensure a safe transition back to normal, safe working conditions:

- Determine and abide by any current municipal, county, state and federal mandates and applicable infectious disease protection protocols for your jurisdiction (e.g., required personal protective equipment (PPE), questions, training, etc.).
 - OSHA Guidance for the construction workforce
 - OSHA Guidance on preparing workplaces
- Ensure proper COVID-19 safety training protocols are established.
- Ensure employees volunteering to use N95 or any rated respiratory PPE is trained in the PPE use and has been given the required training.



- Consider and manage any supply chain difficulties which could lead to further project delays.
- Ensure there is an adequate supply of employee PPE such as dust masks, filtering facepieces (N95 respirators), face shields, etc.
- Assemble a small team to walk the site and document all conditions via video or photo. Consider having subcontractor representatives accompany the group to offer input and evaluate their scope of work.
- Follow safety protocols for restarting utilities (e.g., arc flash protection for switchgear, natural gas supplies, etc.).
- Have third-party restoration contractor relationships and contracts established if necessary.

 Note: It is recommended to use a third party for water damaged area repair greater than 10 square feet.
- Ensure portable restrooms and break areas are <u>cleaned</u>, <u>disinfected</u> and properly spaced before reopening the site.
- Assess and perform any necessary machine inspections and/or recertifications (cranes, hoists, conveyors, HVAC, mechanical, etc.) per applicable regulations and manufacturer recommendations.
- Contact the project's general contractor or owner to discuss possible alterations to scope, schedule or protocols that differ from when the project initially shutdown.
- Determine if previously utilized medical services, such as clinics, remain available.
- Determine if local emergency services remain available.
- Inspect and ensure site and public traffic control protocols and devices remain effective.
- Ensure general public protective systems remain effective, including but not limited to fencing, barricades, lighting, signage and sidewalks/walkways.
- Ensure service/vendor availability remains unchanged (e.g., trash removal, janitorial services, food/concessions, etc.).

Universal protocols and considerations

No matter the industry, there are standard protocols and procedures to consider when evaluating, planning and reopening a location. These universal protocols include:

- The <u>federal</u>, state and local guidelines to lift the mandatory stay-at-home orders will guide the reopening of many organizations. Coordination of these and any updated strategies will be crucial in the resumption of business operations.
- Establishing a local pandemic response team.
- Increasing cleaning and disinfecting of shared and "high-touch" areas within your facility.
 - Please see Lockton's dedicated document here.
- Promoting and maintaining consistent social distancing.
- Potential limits on the number of people allowed in any one area/building.
- Consider staggering start times and workdays of employees.

- Protecting your employees with proper PPE.
- Addressing concerns from employees who may be reluctant to return to work.
- Providing training to employees regarding best practices and safe workplaces related to COVID-19 exposure.
- Ensuring idle equipment is ready for operations.
- Supporting employees that will continue to work remotely.
- Creating a response and communication plan if employees become ill after returning to work.
- Updating and revising your business continuity program with lessons learned.
- · Providing appropriate signage.

Initial programs and specific teams

As organizations begin to create policies to restart their business operations and return their workforce, we recommend the following aspects be considered for early implementation:

- Appoint corporate and local multidisciplinary leadership teams to oversee the entire process and make critical decisions.
- Create working committees or subcommittees to:
 - Notify utilities and pertinent government entities.
 - Ensure all regulatory authorities, such as those dealing with environmental permitting, are notified.
 - Audit equipment to ensure permits are current, such as pressure vessels.
 - Inspect and restart HVAC systems and make sure potable water supplies are safe.
 - Consult with any state or federal emergency reopening orders to determine if increased ventilation requirements will be necessary.
 - Inspect and test any long-idle equipment to assure it's in working order.
 - Design restart procedures, including computer systems, in accordance with manufacturer's specifications.
 - Assess raw materials and inventory on hand, restart supply chain and alert critical vendors.
 Keep an eye out for any raw material spoilage or shelf-life considerations.

- Identify necessary and "missed" preventative maintenance, equipment testing and lubrication cycles.
- Repatriate any critical records, drawing, etc. removed from the site.
- Test and prepare emergency generators and similar back-up systems, including fuel tanks.
- Reassess and implement security needs.
- Establish and spearhead communication protocols to employees, vendors and the media.
- Address post COVID-19 Employee Assistance Program (EAP) related issues.
- Appoint a team who will be the first to enter the facility and perform initial property and process inspections. Make sure this site team is properly trained, issued appropriate PPE and has established a plan before entering.

Operations

There are many aspects of your organization other than construction specifically. The following portion will help you address other key operational factors:

Business supply list

Organizations should evaluate having protective and preventive supplies available for their employees and visitors. The supplies and their location may vary by the unique situation for your facility and operational needs. These supplies may include:

- Hand sanitizer (CDC recommends at least 60% alcohol based).
- Sanitizing wipes (CDC recommends at least 70% alcohol based).
- Disinfectants and disposable towels for workers to clean their work surfaces and equipment.
- Proper face masks; the CDC and OSHA recommends that PPE be selected based upon the hazards of each individual workers.
- Disposable (non-latex) gloves.
- Body temperature devices.
- Display posters promoting hand-washing; ask your local public health authority or visit the WHO website.

Employees

- For those who do return, many may not have conducted their assigned duties in 60+ days, what kind of refresher training will be needed? Did they miss any scheduled safety training that will need to be completed?
- If employees were furloughed, how many are going to be able or want to return to work?
- For those employees that are reluctant to return to your workplace, what can be done to reassure them that it is safe? Do you have an EAP program that can provide guidance and services for employees?
- Specific guidelines may also need to be established for employees with preexisting or high-risk medical factors.

 This may include, but not limited to, the continued offering of voluntary remote work options for these workers.
- If furloughed employees do not return, how will new and/or replacement employees be hired? What timeframe is needed to locate and hire these new employees? How will orientation and training be completed in what could be tight time frames?
- An <u>evaluation</u> should be completed to determine if employees can remain working remotely and/or help stagger entry into the facilities during certain time periods. Remote working guidelines should continue to be followed and updated, as needed. This process will help create needed distance between workers and their work areas.
- Business travel <u>policies</u> should be updated to promote and identify essential situations. Updated guidelines during business-related travel should also be reviewed and modified, if needed.

Visitors

- Organizations can consider limiting their visitors to "critical business" only. The use of alternative mediums of conducting in-person meetings, such as video conferencing, should be considered.
- Similar to your employees, a policy can be created which requires visitors to be screened via body temperature devices.
- Screening questionnaires related to COVID-19 symptom and exposures can also be evaluated for use.
- Make sure visitors and customers have access to locations where they can wash their hands with soap and water.

Facilities

- Increased cleaning and disinfecting per <u>CDC guidelines</u> will need to be completed do you have the internal staff to perform or will a third party be utilized? How does this impact operations workload or cost?
- Many companies were moving to hoteling or shared spaces before the pandemic what are the mechanics in the "new normal?" Who will clean and disinfect the shared spaces between each employee's use? Is this going to be done in-house or by a third party? If in-house, is everyone willing and properly trained?
- Consideration should be given to configure office space and staggered employee reentry, which will allow for adequate spacing between work areas. This may also include physical barriers and shields between workers, as well as with any customers or visitors.
- Depending upon the location of an organization's facilities, alternative temporary or pop-up offices can be evaluated to avoid public transportation or large number of commuters.
- For elevators and stairs, signage should remind individuals to follow needed social distancing criteria.
- Identified areas on flooring in a facility can also be utilized to remind individuals of the needed physical separation with others.
- Minimize group meetings or large gatherings.

Equipment/vehicles

- If equipment and/or vehicles sat idle, what start up procedures, maintenance and/or inspections are needed to get this equipment ready for regular day to day operations? Do you have the staff to complete or are your vendors prepared to assist? What is the timeline to get everything operational?
- Are state-mandated inspections or registrations overdue for any company owned vehicles, trailers, etc.
- Any special equipment and/or start up requirements or protocols that need to be communicated?
- Startup operations involve many non-routines or seldom used procedures, is everyone involved in the startup familiar with the procedures and properly trained?

Claims considerations

- Review physical plant, stock, fleet and equipment for damage.
- Consider any increased cyber vulnerability with increased work from home or movement back to online operations.
- Any increased FDA or other federal scrutiny accompanying supply chain revision, rerouting, etc.
- Consider challenges with returning furloughed or new employees to work.
- · Review and restart random drug testing and other screening protocols.
- Review and restart fit for duty and physical capabilities testing exams.
- Restart transitional modified duty programs for employees previously off work or working modified duty due to pre-closure workers' compensation claims.
- Rebuild job banks.
- Reestablish wellness programs.
- Work with workers' compensation carriers and employment attorneys to assure statutory compliance.
- Confirm procedures in place to thoroughly investigate all reported accidents, including first aid cases and near misses.
- Coordination of continued leave for COVID-19 sick leave or workers' compensation with FMLA and ADA guidelines.
- Establish a plan to deal with a potential increase in claim filing due to layoffs.

Communication

If your business was impacted by the pandemic (e.g., confirmed transmission in your facility), proactive communication will be crucial to ensure that your customers and local community know that you are "open for business." Provide clear and concise information describing any process or procedures your company has implemented to protect your employees, customers and community moving forward. It is expected that both customers and employees returning to their "normal" activities may experience a psychological hesitation of feeling safe. Communications of the proactive actions taken to reopen facilities and keeping individuals free from known exposures will be invaluable in successfully moving forward.

Business continuity

Once you return to your site, it is recommended that your business continuity program (BCP) be reviewed and updated accordingly based on the outcomes and lessons learned through this pandemic so your organization is prepared for the future. All facets of your business should be examined (e.g., IT infrastructure, software and video conference platforms, remote working policy, etc.) and reviewed.

See Lockton's article on Business Continuity.

Business insurance considerations

As workers, customers and visitors reenter facilities, sound risk management techniques should be utilized for the proactive safety of individuals and the protection of the organization. Entities should follow proper investigation and documentation techniques for injuries and damages which may occur. All potential losses should be reported by organizations to their applicable insurance policies in a timely manner.

MORE INFORMATION ON COVID-19 RELATED LOSSES CAN BE FOUND AT:

Coronavirus Insurance Coverage and Claim Guidance

Property Business Interruption and Civil Authority COVID-19 Claim and Coverage Guidance

COVID-19 and Employment Practices Related Claims

Employer Liability Coverage and Strategy Guide

Managing workers' compensation for remote workers