COVID-19
Construction Project and Vendor Safety Education, Planning, Response & Safety Requirements

Washington University in St. Louis
Revised June 2020
Washington University, its vendors and contractors recognize the potential of exposure to Coronavirus (COVID-19) on our projects and in our offices and the impact it could have on our people and the University mission.

All projects require jobsite specific safety plans and employee self-screening for all vendors and contractors. The complexity of a plan will vary by the size of the jobsite. Contractors are ultimately responsible for all of their safety plans and implementation. If their method varies, it must not conflict with the University plan.

All vendors and contractors are required to monitor the University’s COVID-19 website and are responsible for compliance with university policy related to all work-sites.

Accordingly, we have the following plan in place in the event of an individual being suspected of having and/or tests positive for COVID-19 and was present on a contractor project site or in a university space.
How do you protect yourself?

Know How it Spreads

• There is currently no vaccine to prevent coronavirus (COVID-19).
• The best way to prevent illness is to avoid being exposed to this virus.
• The virus is thought to spread mainly from person-to-person.
  • Between people who are in close contact with one another (within about 6 feet).
  • Through respiratory droplets produced when an infected person coughs or sneezes.
• These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

Take Steps to Protect Yourself

• Clean your hands often
  • Wash your hands often with soap and water for at least 20 seconds especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
  • If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
  • Avoid touching your eyes, nose, and mouth with unwashed hands.
• Avoid close contact
  • Avoid close contact with people who are sick.
  • Put distance between yourself and other people if COVID-19 is spreading in your community. This is especially important for [people who are at higher risk of getting very sick (link is external)].

Contractor/Vendor Education Guide for Preventive Measures on the Job Site

How do you protect others?

Stay home if you’re sick
  • Stay home if you are sick, except to get medical care. Learn what to do if you are sick (link is external).

Cover coughs and sneezes
  • Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
  • Throw used tissues in the trash.
  • 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 that contains at least 60% alcohol.

Wear a face mask while on the School of Medicine campus
  • The Medical Campus has moved to universal masking and all contractors, vendors and employees must mask while they are in any campus facility for any reason. The campus is considering the mask essential PP.

Clean and disinfect
  • Clean AND disinfect frequently touched surfaces (link is external) daily. This includes tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
  • If surfaces are dirty, clean them: Use detergent or soap and water prior to disinfection.
  • Complete disinfection guide (link is external)

Source: Centers for Disease Control and Prevention (CDC) COVID-19 Webpage
Planning & Responding to COVID-19

Purpose of Plan

- Protect people and reduce the spread of the virus
- Sustain business and service operations
- Provide access to internal and external expertise
- Ensure compliance with contractual, university and regulatory requirements, including reporting and risk mitigation processes
- Provide access to locations for ongoing information and updates

Important Resources

School of Medicine COVID-19 website

Operations & Facilities Management COVID-19 website
Section 1: Protection of People and Reduction of the Spread of COVID-19

Communicate and document conversation with the individual with or suspected of COVID-19

- Confirm individual is receiving the care and testing they need – communication should occur by phone if at all possible, and, if on the jobsite, should be done outdoors while maintaining a six-foot social distance.

- Determine if the individual knows when and where they may have been exposed.

- Confirm areas and people the individual has had contact with and what days and time – gather as much information as possible since possible exposure.

- Direct the individual not to report to work and to self-quarantine to avoid contact with all other people to avoid spreading the illness.

- The employee entity (University, Contractor or Vendor) of the employee in question is required to let them know of where they are expected to test, their company policy, and all available resources and benefits available to them at this time. If a subcontractor employee, they will be directed to check benefits and additional requirements with their employer.

- If an individual receives notification of a possible exposure or testing of a positive diagnosis of COVID-19 while at the project or office, please isolate them immediately and provide them with PPE to wear (mask and gloves).
Section 2 – Identification & CDC Guidelines

Identify persons, physical locations and contact information of all those who came in close contact with exposed worker.

- Follow the CDC definitions at all times when this identification is in process:
  - CDC definition of close contact is being within 6 feet (2 meters) of a COVID-19 case for a prolonged period of time; close contact can occur when caring for, living with, visiting, working with, or sharing a health care waiting area or room.
  - Having direct contact with an infectious secretion of a COVID-19 case (e.g. being coughed on).

Section 3: Separate & Inform

Separate and inform workers with close contact and provide direction

- The contractor, vendor or university representative will inform those who were in close contact, both verbally and in writing of the situation.

  - The identity of the individual with COVID-19 must remain private.

  - The Centers for Disease Control and Prevention recommends these individuals limit public activities.

  - Employees or individuals (contractor, vendor or university) should self-quarantine all employees who had potential exposure and ask them to self-quarantine for 14 days from the day they had contact.

  - Employees or individuals sent home to self-quarantine should self-monitor symptoms for 14 days and if any symptoms are noticed are given direction to contact public or occupational health for testing. Employees may return to work with the approval of occupational health clearance but must be fully masked to return.

During self-quarantine employees and individuals are restricted from entering or returning to any vendor, contractor or to the job site for any reason.
Section 4: Quarantine & Self-Care

Employees and individuals under quarantine should refer to the CDC guidelines for requirements and recommendations for daily self-monitoring.

• Employees and individuals in quarantine are not to go to school or work and should remain in their home and avoid all contact with others, including those within their own home to prevent potential exposure.


• Inform exposed individuals and employees to call their doctor for medical advice: If they have been exposed to COVID-19 and develop a fever and symptoms, such as cough or difficulty breathing.
• Returning to work requires occupational health and your physician clearance.

Section 5: Communication
Requirement – Requirement to Inform

Whether you are a vendor, contractor or a member of the university project or operations team member, you are required to follow the university, company and regulatory process in place for all involved organizations and the regulatory agencies involved in the emergency response process in the St. Louis City, St. Louis County or local jurisdiction.

- Maintain the privacy of the employee or individual testing positive with COVID-19.
- All entities involved will inform their organizations as required in the established safety plan.
- All individuals in the impacted area (physical location) who have been identified as being potentially exposed will be notified by their employer.
- The parties will work together to ensure there are no gaps and voids in the incident response plan and the review is done across the involved organization.
  - Example – construction project may involve Project Manager of the owner, campus partners or customers, contractor employees and subcontractors.
- Stick to the facts. Share facts of the situation – the response is to protect our employees, customers and the public.

Section 6: Sustain Business Operations

The Incident Commander (first entity to respond and control site) is responsible for stopping all work in the area associated with the exposed area in question. Once a suspected case is confirmed, the Incident Commander should take control of the site and secure it to prevent potential exposure.

- The contractor, subcontractor, vendor and university leader will become the incident commander for the response and will review with EH&S and Safety Officers to determine if the project or activity can occur in the immediate area outside of the secured area or if the job needs to stop while site mitigation occurs.

- A site mitigation process has been established for university space and our Emergency Response Contractor, Woodard, will be utilized for this mitigation work at WUSM. Woodard and CATCO will be utilized for this mitigation work on the Danforth Campus. Contractors may use other vendors or their own services to mitigate control areas utilizing approved mitigation protocols approved by the university. All mitigation will follow the CDC direction and should be considered the corrective direction. [https://www.cdc.gov/coronavirus/2019-ncov/prepare/disinfecting-building-facility.html](https://www.cdc.gov/coronavirus/2019-ncov/prepare/disinfecting-building-facility.html)

- A contractor with an active project site will utilize CDC Mitigation standards for site mitigation.

- The project or area vacated or paused for mitigation can be reopened with the permission of EH&S and the Assistant Vice Chancellor of Operations and Facilities for the School of Medicine, for BJH locations by EH&S and the Vice President of Facilities, for the Danforth Campus by EH&S and the Assistant Vice Chancellor of Facilities Planning & Management, and/or the designated Vice President, or Vice Chancellor of other university areas as defined by the project or area assignment. [https://www.cdc.gov/coronavirus/2019-ncov/prepare/disinfecting-building-facility.html](https://www.cdc.gov/coronavirus/2019-ncov/prepare/disinfecting-building-facility.html)

- Refer to COVID-19 construction guidelines for recommendation to project work force provided by the university for all active construction projects on campus.
Section 7: Access to Internal and External Expertise

The Incident Commander of the entity with the employee notification is responsible for notifying all other partners, clients and customers involved in the business area, service or project as well as both parties EH&S and Safety officers.

- All Contractor Project Safety Plans must include a project emergency call list. This list should be in place prior to any project activation. It is the responsibility of the Project Manager and contractor to keep this list current throughout the life of the project and will assist with the notification process.

- If a large portion of the workforce is impacted by the exposure, a business secondary mitigation may be required to maintain business continuity for the unaffected project areas. Important pre-planning objectives include:
  - It may be required for the project to remain active that this plan be in place as part of the project risk mitigation plan prior to the start of the construction project. The Project Manager assigned by the university is responsible for this plan and operationalizing this plan with their partners. Pre-planning for this possibility is encouraged.
  - All large projects will require a risk mitigation plan by trade and project component at the start of construction.
  - Ensure site safety at all times. If a job has to be paused for safety, it remains safety first at all times and this will be supported by the campus and its partners.
Section 8: Compliance with Regulatory Obligations

• All parties will monitor and comply with the recommendations, requirements and guidelines from the CDC, WHO and other agencies with authority and expertise in the area of COVID-19.

• All parties will review and comply with all governmental guidance including OSHA CFR 1904 Recordkeeping requirements.

• All parties will follow university and campus requirements and regulations, including those in place for the COVID-19 Pandemic.

Sources:


https://www.osha.gov/

https://coronavirus.med.wustl.edu/
OSHA Provides Guidance on Recording Workplace Exposures to COVID-19

• OSHA recordkeeping requirements at 29 CFR Part 1904 (link is external) mandate covered employers record certain work-related injuries and illnesses on their OSHA 300 log.

• COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are met:

  • The case is a confirmed case of COVID-19 (see CDC information (link is external) on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19);

  • The case is work-related, as defined by 29 CFR 1904.5 (link is external); and

  • The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (link is external) (e.g. medical treatment beyond first-aid, days away from work).
Appendix of Supplemental Resources

• COVID-19 Construction Project and Vendor Safety Response Plan Requirements and Resources
• Construction Response Plan Template (Contractor & Vendor Use) – required with supporting safety plan
• AGC Proactive Measure for Addressing COVID-19 Self Screening and response tool
• Resource for identifying symptoms of COVID-19
• CDC Crisis & Emergency Communication Tool
  • Be First
  • Be Right
  • Be Credible
  • Express Sympathy
  • Promote Action
  • Show Respect
• COVID-19 Construction Guidelines – on the job
• COVID-19 Construction Guidelines COVID-19 Vendor Letter (University)
• Large Project Shutdown Checklist (full shutdown)
• Contractor template examples (WUSM & Danforth)
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