

CPWR- The Center for Construction Research and Training
Recommendations:
COVID-19 Plan for Union Training Centers

12 August 2020

The purpose of this plan is to outline the steps that every training center employee and trainee can take to reduce the risk of exposure to COVID-19. The plan describes how to prevent trainee exposure to coronavirus, protective measures to be taken at the training center, personal protective equipment and hands-on training practice controls to be used, cleaning and disinfecting procedures, and what to do if a Training Center staff or trainee becomes sick.

Insert Training Center Name takes the health and safety of our trainees and Staff 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 training centers supporting the construction industry, which has been deemed “essential” during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Plan for Insert Training Center Name to be implemented throughout the Training Center and at all our training locations. We have also designated a COVID-19 officer to monitor available U.S. Center for Disease Control and Prevention (“CDC”), Occupational Safety and Health Administration (“OSHA”), and state and local health department guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Training Center may also amend this Plan based on operational needs.

I. Responsibilities of Training Center Directors and Trainers

The Training Center Director, Trainers and Staff must be familiar with this Plan and be ready to answer questions from trainees and visitors. Training Center Directors, Trainers and Staff must always set a good example by following this Plan. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Training Center Directors, Trainers and Staff must encourage this same behavior from all trainees.

II. Responsibilities of Trainees

We ask every one of our trainees to help with our prevention efforts while at the training center. In order to minimize the spread of COVID-19 at our Training Center, we all must play our part. As set forth below, the Training Center has instituted various housekeeping, social distancing, and other best practices at our training center. All trainees must follow these. In addition, trainees are expected to report to the Training Center Director or Trainers if they experience signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask the Training Center Director or Trainers. If they cannot answer the question, please contact Add Title Here.

OSHA and the CDC have provided the following control and preventative guidance to all trainees, 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 sanitizer with at least 60% ethanol or 70% isopropanol.
- Avoid touching your eyes, nose, or mouth with hands.
- Follow appropriate respiratory etiquette;
 - Cover your mouth and nose with a tissue when you cough or sneeze
 - Throw used tissues in the trash
 - If you don't have a tissue, cough or sneeze into your elbow, not your hands
 - Bend your arm, and make sure you sneeze into, not over, your elbow
- Immediately wash your hands after blowing your nose, coughing or sneezing.
- Avoid close contact with people who are sick.
- Maintain at least six (6) feet physical distance while in shared spaces.

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

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, repeated shaking with chills, muscle pain, sore throat, new loss of taste or smell and headache.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT COME TO THE TRAINING CENTER** 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. Training Center Protective Measures

The Training Center has instituted the following protective measures at all training locations.

A. General Safety Policies and Rules

- All staff, students and visitors must wear a face mask upon entering a Insert Training Center Name building. Training Center Staff must wear a face mask in common areas outside of their personal workstation/office, such as classrooms, hallways, copy room, conference rooms, kitchen/break area, and restrooms. Face masks must be worn in all

hands-on areas, regardless if they are indoors or outdoors, if social distancing (minimum of 6 feet) cannot be maintained.

- Face masks will be made available and are located in the **INSERT LOCATION**. Personal facemasks, homemade or purchased, are also acceptable as long as they meet CDC guidelines for face coverings - <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html>.
- Prior to beginning training, trainees will be briefed on the new exposure controls and class expectations for conducting training.
- The Training Center will provide soap, running water, and single use towels or air dryers for frequent handwashing and will ensure they are replenished throughout the training day. When soap and water are not available, alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol will be provided.
- Any trainee/visitor showing symptoms of COVID-19 will be asked to leave the Training Center and return home.
- During all in-person training classes, avoid gathering in groups of more than 10 people and trainees must remain at least six (6) feet apart. In-person training sessions will be limited by the available classroom size to maintain social distancing. Classroom seating will be arranged to ensure trainees maintain at least six (6) feet between each trainee.
- Consider providing barriers or screens between seated participants.
- The trainer station (desk, chair, workstation, etc.) will be located a minimum of six feet from the trainees.
- Access and egress
 - Provide separate points of access and egress for the training center and the classroom (if possible) and designate one as an entrance and one as an exit. For example, have participants enter from the back of the room and exit from the front of the room to minimize face-to-face contact.
 - Arrange for a one-way flow through the training center and classroom to minimize face-to-face cross-traffic.
 - When filling the classroom: Have participants enter from the rear entrance of the room; ensure the first participant entering the room is seated furthest from the entry-point (and nearest to exit); and continue to fill from the front to the back to minimize participants passing by each other while filling the room.
 - Promote that only one participant leaves at a time during the training class to avoid face-to-face cross-traffic.
 - Upon leaving the training classroom, unseat participants in order, starting with those closest to the exit and ending with those farthest from the exit.
- Trainees must avoid physical contact with others (No hand shaking, high-fives or fist bumps) and direct others to increase personal space to at least six (6) feet, where possible.

- Attendance will be collected verbally, and the trainer will sign-in each trainee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. Technology applications should be considered, such as Adobe Sign or DocuSign, when rules, policies or regulations require students to physically sign a sign-in sheet. Signing in using technology should be done through a student's personal mobile device (laptop, smartphone or tablet) or a device (laptop or tablet) assigned by the training center specifically to that student for use during training.
- If tests, exams, assessments, etc. are administered, answer sheets will be placed on desk before trainees arrive. Trainees will grade themselves. Trainers will take completed post-test with gloved hands and place in manila envelope. Paperwork should be quarantined for a minimum of 72 hours before being opened and filed.
- If self-grading of tests, exams, assessments, etc. is not allowed, trainers should establish a collection area where trainees will place their completed test, exam, assessment, etc. for grading. Trainees will maintain at least six (6) feet between themselves and other trainees as they approach/leave the collection area. Trainers will take the materials with gloved hands and grade each test, exam, assessment, etc. and record the score. Trainees can verbally be told if they passed or failed, or trainer can post grades, ensuring trainee anonymity, in the classroom. Trainers will take completed post-test with gloved hand and place in manila envelope. Paperwork should be quarantined for a minimum of 72 hours before being opened and filed.

Technology applications can be considered, such as Kahoot! Pro, QuizStar, Hot Potatoes, Articulate Quizmaker, or Quizlet, when administering tests/quizzes/exams. Using technology should be done through a student's personal laptop, mobile device (smartphone or tablet) or a device (laptop or tablet) assigned by the training center specifically to that student for use during training.

- Trainee breaks and lunches will be staggered, if practicable, to reduce the size of any group at any one time to less than ten (10) people. Trainees will be released by seating rows to maintain social distancing. A distance of six (6) feet will be maintained during lunch and breaks.
- In lieu of using a common source of drinking water, such as a water fountain, cooler or bubbler, trainees should use/be provided individual water bottles.
- Trainees are encouraged to bring food from home and not share with others.
- If lunch is to be provided by the Training Center, lunches should be prepared off site and individually packaged "box lunches." No buffet style meals should be provided. Drinks should be in bottles or cans and sealed. If coffee is provided, a designated staff member at the Training Center will prepare cups of coffee using food handling techniques and good hygiene eliminating the risk of multiple students using a single coffee pot.
- Trainees must clean their hands by washing them with soap and water for at least 20 seconds. When hand washing isn't available, use an alcohol-based hand sanitizer with

greater than 60% ethanol or 70% isopropanol. Soap and water should be used if hands are visibly dirty.

- Trainees shall clean their hands frequently, including before and after going to the bathroom, before and after eating, and after coughing, sneezing, or blowing their nose.
- The use of books, manuals, student guides, handouts, pens, pencils, highlighters and markers should be eliminated where practical. If needed, they should be one-time use only. If books, manuals, student guides or other paper-based training materials need to be saved, trainers will take the materials with gloved hands and quarantine them for a minimum of 72 hours before being reused.
- Trainees should not use other trainees' personal protective equipment (PPE) and training materials (i.e., manuals, pens, highlighters, notepads, etc.) and limit the use of other trainees' tools and equipment. To the extent PPE, tools and equipment must be shared, the Training Center will provide alcohol-based wipes, or other disinfecting materials, to clean PPE, tools and equipment before and after use. When cleaning PPE, tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Trainees are encouraged to minimize ridesharing.
- One instructor will operate audio/visual equipment and will be responsible for cleaning the equipment at the end of class using a disinfecting wipe and gloved hand.
- All classroom-based props/demonstration materials will now be handled by the trainers. The trainer utilizing the prop/demonstration materials will be responsible to sanitize the prop/demonstration materials before and after each use.

B. Performing Temperature Screenings on Employees

- Temperature screening should be done on ALL Training Center employees and should not be done on a selective or case-by-case basis.
- Strict temperature testing protocols should be uniformly followed in administering any temperature screening program. These protocols should be based on clear medically based criteria for how employee temperatures are measured, what cutoffs are used for determining normal versus "trigger" temperature readings, what actions are taken when a "trigger" reading appears, and what records are kept. Medical advice should be obtained in establishing these protocols, and guidelines from public health authorities should be followed.
- Employee names, temperature readings, and other medical information (including information that is either documented or simply known to Training Center staff) should be kept strictly confidential. Such information should be shared only with Training Center personnel based on a need-to-know basis tied to their administration of the screening program. In addition, Training Center staff may share the information with public health authorities when required to do so. This will help to

avoid potential liability for invasion of employee privacy. When information is shared, only what absolutely must be shared should be disclosed.

- Personnel who administer the temperature screening should be provided with proper personal protective equipment (PPE) and trained in how to use it, given clear testing protocols, trained in how to follow those protocols, trained in proper disposal of biowaste (if any), and monitored and screened for signs of COVID-19 themselves. Recommended PPE includes, respiratory protection, safety glasses/googles/face shield, gloves, and gowns.
- A Training Center Director that undertakes a temperature screening program should keep abreast of updates from public health authorities, as much remains unknown about the Coronavirus. Changes in public health guidance may dictate changes in the Training Center's program.

C. Training Center Visitors

- The number of visitors to the training center will be limited to only those necessary for the work.
- All visitors will be screened in advance of arriving at the training center. If the visitor answers "yes" to any of the following questions, he/she should not be permitted to access the training center:
 - Have you been confirmed positive for COVID-19?
 - Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
 - Have you been in close contact with any persons who has been confirmed positive for COVID-19?
 - Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- Training center deliveries will be permitted but should be properly coordinated in line with the training center's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles when practical.
- All visitors must wear a face mask upon entering a Insert Training Center Name building. Personal facemasks, homemade or purchased, are acceptable as long as they meet CDC guidelines for face coverings. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html>

D. Personal Protective Equipment and Work Practice Controls

- All shared Training Center Personal Protective Equipment (PPE) will be cleaned and disinfected after each trainee use. Shared PPE may include, but is not limited to:

- Respirators;
 - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Trainees should wear reusable, elastomeric N95 respirators if required by the work.
- Hearing Protection: Earmuffs
- Gloves
- Hard hats;
- Safety Glasses;
- Chemical Protective Clothing
- Welding Masks and Flame-Resistant Clothing

IV. Job Site Cleaning and Disinfecting

The Training Center has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used Personal Protective Equipment (PPE), tools and equipment, and other elements of the training center environment, where possible.

- Office areas, classrooms, common areas, high contact surfaces, bathrooms and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper PPE, as recommended by the CDC.
- Trash collected from the training center must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable toilets used on-site should be cleaned by the leasing company at least twice per week and disinfected on the inside. The training center will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.
- Vehicles and equipment/tools should be disinfected at least once per day and before change in operator or rider.
- If a training center employee or trainee has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, the Training Center will disinfect those areas of the training center that a confirmed-positive individual may have come into contact with before training center staff and trainees can access that space again.
- The Training Center will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant;
 - Alcohol solution with at least 60% ethanol or 70% isopropanol; or

- Diluted household bleach solutions (these can be used if appropriate for the surface).
- The Training Center will train employees on the hazards of the cleaning chemicals used in the Training Center in accordance with OSHA’s Hazard Communication standard (29 CFR1910.1200).
- The Training Center will maintain Safety Data Sheets of all disinfectants used on site.

V. Training Center Exposure Situations

Trainee Exhibiting COVID-19 Symptoms

If a trainee exhibits COVID-19 symptoms, the trainee must remain away from the training center until he or she is symptom free for fourteen (14) days without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The Training Center will similarly require a trainee, that reports to the training center with symptoms, to return home until they are symptom free for fourteen (14) days.

Training Center Employee Exhibiting COVID-19 Symptoms

If a Training Center employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for fourteen (14) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The Training Center will similarly require an employee, that reports to work with symptoms, to return home until they are symptom free for fourteen (14). To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

Training Center Employee Tests Positive for COVID-19

A Training Center employee that tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least fourteen (14) days have passed since the date of his or her first positive test and have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;¹ and (2) at least fourteen (14) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Training Center will require an employee to provide documentation clearing their return to work.

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

Trainees that have come into close contact with a confirmed-positive COVID-19 individual, will be directed to stay away from the training center for 14 days from the last date of close

¹ Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

Training Center Employee Has Close Contact with a Tested Positive COVID-19 Individual

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to 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 the Training center learns that an employee has tested positive, the Training center will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert the Training Center Director of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

VI. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported by a training center employee, the Training Center will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. "In-patient" hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an "illness." However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, the Training Center will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would *not* be work-related, and thus not recordable.

The Training Center's assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Training center will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

VII. Confidentiality/Privacy

Except for circumstances in which the Training Center is legally required to report workplace occurrences of communicable disease, 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 an employee's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. The Training Center reserves the right to inform other employees that a co-worker (without disclosing the person's name) has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health.

VIII. General Questions

Given the fast-developing nature of the COVID-19 outbreak, the Training Center may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Add Title Here.

Employee Notification

DATE: DATE
TO: CLOSE CONTACT EMPLOYEE
FROM: TRAINING DIRECTOR

We have been informed by one of our employees/trainees/vendor/etc working/training/visiting at TRAINING SITE that he/she has a confirmed case of COVID-19, commonly known as “Coronavirus,” based on test results obtained on DATE. Per Training Center policy, this employee/trainee/vendor/etc has been directed to self-quarantine until permitted to return to work or prohibited from entering the training center until they provide documentation clearing their return.

We are alerting you to this development because, based on the Training Center’s investigation, we believe that you may have come into contact with the confirmed-positive case, on or about DATE. Based on Training Center policy we are directing you not to report to work (i.e., self-quarantine) until, at least, 14 days from last contact with confirmed case. In the interim, we encourage you to seek medical advice and a COVID-19 test, especially if you are exhibiting symptoms of the virus.

If you do not test positive for COVID-19, or experience symptoms, by 14 days from last contact with confirmed case, you may return to work. However, please inform TRAINING CENTER CONTACT if any of the following occur during your self-quarantine: you experience flu-like symptoms, including fever, cough, sneezing, or sore throat; or you test positive for COVID-19.

We are committed to providing a safe environment for all of our employees and a safe environment for our students. It is in the interest of those goals that we provide this information out of an abundance of caution.

We also want to take this opportunity to remind you that one of our core values as a training center is respect for and among our employees. We will treat information regarding the identity of employees with suspected or confirmed cases of COVID-19 as confidential to the extent practicable and will comply with applicable laws regarding the handling of such information. Further, per Training Center policy, we will not tolerate harassment of, or discrimination or retaliation against, employees or anyone.

Please contact TRAINING CENTER CONTACT AWARE OF APPROPRIATE PROTOCOLS at PHONE NUMBER if you have any questions or concerns.

For more information about COVID-19, please visit the CDC website at:
<http://www.cdc.gov/coronavirus/2019-ncov/index.html>