Requirements & Guidance for Restarting Phase 1 Low Risk Work

Phase 1 Restart COVID-19 Job Site Requirements

Phase 1: Low-risk work resumes. Authorized work complying with the points below may resume. If a work activity requires workers to be closer than six-feet, it is not considered low-risk and is not authorized. Adherence to the physical distancing requirement and the health and safety points below will be strictly enforced.

Background
In support of the Governor’s COVID-19 proclamation, the Washington State Department of Transportation (WSDOT) placed almost all of its construction and other field work on hold. This document provides guidance and requirements for use by WSDOT employees to restarting Phase 1 (Low Risk activities. This guidance will be updated to reflect Phase 2 and Phase 3 protocols as appropriate.

Requirements for Restarting
The following table outlines the requirements for restarting low risk activities. Some activities may fall within the scope of more than one category and supervisors are encouraged to discuss the risk and appropriate approach with their management team. Compliance is required to ensure a healthy workforce. Consistent and strict adherence to the applicable protocols such as Pre-Activity Safety Plan (PASP) and Personal Protective Equipment (PPE) is expected.

Prior to recommencing work all groups are required to develop and have at each job site a comprehensive PASP that contains the COVID-19 exposure control, mitigation, and recovery plan. The PASP must include policies regarding the following control measures: PPE utilization; on-site physical distancing; hygiene; sanitation; symptom monitoring; incident reporting; site decontamination procedures; COVID-19 safety training; exposure response procedures; and a post-exposure incident project wide recovery plan. A copy of the PASP must be available on each work site and available for inspection by state and local authorities. Failure to having a proper PASP on site will result in sanctions, including the job being shut down.

WSDOT is required to have at each job site written notice to employees and visitors the Phase 1 work that will be performed at that job site and signed commitment to adhere to the requirements listed in this document. WSDOT has a general obligation to keep a safe and healthy worksite in accordance with state and federal law. Failure to follow these requirements will be considered a violation of these duties and be penalized accordingly. Under RCW 49.17.060, “each employer shall furnish to each of their employees a place of employment free from recognized hazards that are causing or likely to cause serious injury or death to his or her employees and shall comply with the rules, regulations, and orders promulgated under this chapter.” The Washington State Department of Labor & Industries’ Division of Occupational Safety and Health (DOSH) is responsible for workplace safety and health, including inspections and enforcement, consultation, technical assistance, training, education and grants.

All WSDOT employees are also required to comply with the following COVID-19 worksite-specific safety practices, as outlined in Gov. Jay Inslee’s “Stay Home, Stay Healthy” Proclamation 20-
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25, and in accordance with the Washington State Department of Labor & Industries General Coronavirus Prevention Under Stay Home-Stay Healthy Order (DOSH Directive 1.70) and the Washington State Department of Health Workplace and Employer Resources & Recommendations.

WSDOT must specifically ensure all operations follow the main L&I COVID-19 requirements to protect workers, including:

- Educate workers in the language they understand best about coronavirus and how to prevent transmission and the employer’s COVID-19 policies.
- Maintain minimum six-foot separation between all employees (and customers) in all interactions at all times. When strict physical distancing is not feasible for a specific task, other prevention measures are required, such as use of barriers, minimize staff or customers in narrow or enclosed areas, stagger breaks, and work shift starts.
- Provide personal protective equipment (PPE) such as gloves, goggles, face shields and face masks as appropriate or required to employees for the activity being performed. Cloth facial coverings must be worn by every employee unless they are working alone, (with no chance of human interaction), on the jobsite unless their exposure dictates a higher level of protection under Department of Labor & Industries safety and health rules and guidance. This wording gives us the flexibility to allow people to take off their masks when they are in their vehicles, when they are off working by themselves, when they are not working (i.e. eating, taking breaks, etc.), when they are operating equipment by themselves. Refer to Coronavirus Facial Covering and Mask Requirements for additional details, (the Non-NIOSH approved Filtering Face Piece Respirators, such as KN-95’s, along with higher level respiratory protection, that are approved for use in the Facial Covering and Mask Requirements document can be used for both the Medium and High Risk work activities). A cloth facial covering is described in the Department of Health guidance.
- Ensure frequent and adequate hand washing with adequate maintenance of supplies. Use disposable gloves where safe and applicable to prevent transmission on tools or other items that are shared.
- Establish a housekeeping schedule that includes frequent cleaning and sanitizing with a particular emphasis on commonly touched surfaces.
- Screen employees for signs/symptoms of COVID-19 at start of shift. Make sure sick employees stay home or immediately go home if they feel or appear sick. Cordon off any areas where an employee with probable or confirmed COVID-19 illness worked, touched surfaces, etc. until the area and equipment is cleaned and sanitized. Follow the cleaning guidelines set by the CDC to deep clean and sanitize.

A worker may refuse to perform unsafe work, including hazards created by COVID-19. And, it is unlawful for their employer to take adverse action against a worker who has engaged in safety-protected activities under the law if their work refusal meets certain requirements.

Employees who choose to remove themselves from a worksite because they do not believe it is safe to work due to the risk of COVID-19 exposure may have access to certain leave or unemployment benefits. Employers must provide high-risk individuals covered by Proclamation 20-46 with their choice of access to available employer-granted accrued leave or unemployment benefits if an alternative work arrangement is not feasible. Other employees may have access to expanded family and medical leave included in the Families First Coronavirus Response Act, access to use unemployment benefits, or access to other paid time off depending on the circumstances. Additional information is available here.
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### COVID-19 Site Supervisor

1. A site-specific COVID-19 Supervisor shall be designated by the contractor at every job site to monitor the health of employees and enforce the COVID-19 job site safety plan. A designated COVID-19 Supervisor must be present at all times during construction activities, except on single-family residential job sites with 6 or fewer people on the site. When on an active job site, coordinate with the Contractor’s COVID-19 Supervisor. When not on an active job site, follow the same guidance for Pre-Construction Field Work. Designate one or more employee(s) as a “Physical distance monitor” to ensure physical distancing practices are consistently followed when a workspace is occupied by seven or more persons and 6 feet of separation is difficult to maintain.

### COVID-19 Safety Training

2. A Safety Stand-Down/toolbox talk/tailgate training must be conducted on all job sites on the first day of returning to work, and weekly thereafter, to explain the protective measures in place for all workers. Physical distancing must be maintained at all gatherings. Applies as-is. Complete the WSDOT COVID-19 What you Need to Know mandatory training.

COVID-19 What You Need to Know, is mandatory training in LMS that must be accomplished prior to or at the start of work.

3. Attendance will be communicated verbally and the trainer will sign in each attendee. Applies as-is. Document on PASP. Does not apply. Applies as is.

4. COVID-19 safety requirements shall be visibly posted on each jobsite. Applies as-is. Not applicable, however the PASP’s shall be kept on site, e.g., in a vehicle Not applicable, however the PASP’s shall be kept on site, e.g., in a vehicle Post this Jobsite Safety Tips poster at workplaces. Applies as-is.

### Physical distancing

5. Physical distancing of at least 6 feet of separation must be maintained by every person on the worksite at Applies as-is.
6. Gatherings of any size must be precluded by taking breaks and lunch in shifts. Any time two or more persons must meet, ensure minimum 6 feet of separation.  
   - Applies as-is.  
   - Applies as-is, however the size of any group at any one time is limited to less than ten (10) people.  
   - Applies as-is.

7. Identify “choke points” and “high-risk areas” on job sites where workers typically congregate and control them so physical distancing is always maintained.  
   - Applies as-is.

8. Minimize interactions when picking up or delivering equipment or materials, ensure minimum 6-foot separation.  
   - Applies as-is.

9. To the extent practical allow only one trade/subcontractor at a time on a jobsite and maintain 6-foot separation physical distancing for each member of that trade. If more than one trade/subcontractor must be on the job to complete the job then at a minimum all trades and subcontractors must maintain physical distancing policies in accordance with this guidance.  
   - Applies as-is.  
   - Not applicable, however, when field work involves third parties, the PASP should be reviewed with all participants. Ensure 6 feet of separation.  
   - Not Applicable.

**Personal Protective Equipment (PPE) – Employer Provided**

10. Provide personal protective equipment (PPE) such as gloves, goggles, face shields and face masks as appropriate, or required, for the activity being performed.  
    - Applies as-is.
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<tr>
<th>Rule</th>
<th>Requirement</th>
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<td>11.</td>
<td>Masks, in accordance with Washington Department of Health guidelines, or as required by Washington Department of Labor &amp; Industries (L&amp;I) safety rules, must be worn at all times by every employee on the worksite. 5/22/20: This language is in the process of being modified. Until further updates, please refer to the guidance shown to the right.</td>
<td>For mask requirements see the beginning of this document for the guidance and follow the Coronavirus Facial Covering and Mask Requirements.</td>
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<td>12.</td>
<td>Eye protection must be worn at all times by every employee on worksite. 5/22/20: This language is in the process of being modified. Until further updates, please refer to the guidance shown to the right.</td>
<td>Eye Protection that is appropriate for the hazards associated with the task are to be worn as required.</td>
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<tr>
<td>13.</td>
<td>Gloves must be worn at all times by every employee while on worksite. 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. 5/22/20: This language is in the process of being modified. Until further updates, please refer to the guidance shown to the right.</td>
<td>Gloves that are appropriate for the hazards associated with the task are to be worn as required.</td>
</tr>
<tr>
<td>14.</td>
<td>If appropriate PPE cannot be provided, the worksite must be shut down.</td>
<td>Applies as-is.</td>
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WSF currently operates under general WSDOT directives and the guidelines defined in the following agency communications:
- Safety Bulletin 1420
- Safety Bulletin 1920
- Safety Bulletin 2120

Updated mandatory mask use bulletin is under review.
### Sanitation and Cleanliness

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| 15. Soap and running water shall be abundantly provided on all job sites for frequent handwashing. Workers should be encouraged to leave their workstations to wash their hands regularly, before and after going to the bathroom, before and after eating and after coughing, sneezing or blowing their nose. | When on an active job site, use facilities provided by the contractor.  
When not on an active job site, follow the same guidance for Pre-Construction Field Work.  
Applies as is. Follow #16 when water is not available.                                                                 |
| 16. When running water is not available, portable washing stations, with soap, are required, per WAC 296-155-140 2(a) – (f). Alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol can also be used, but are not a replacement for the water requirement. | 1. Employees must use onsite fixed or portable hand-washing stations if available.  
2. Offsite hand-washing stations may be used if there are within a 3-minute travel distance.  
3. A makeshift hand-washing station with bottled water and soap is also acceptable. Use of hand-sanitizer is permitted if the above options are infeasible and/or impracticable. |
| 17. Post, in areas visible to all workers, required hygienic practices, including not to touch face with unwashed hands or with gloves; washing hands often with soap and water for at least 20 seconds; use hand sanitizer with at least 60% alcohol; cleaning and disinfecting frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, machines, shared tools, elevator control buttons, and doorknobs; covering the mouth and nose when coughing or sneezing as well as other hygienic recommendations by the U.S. Centers for Disease Control (CDC). | Contractor Responsibility  
Ensure the following posters, or equivalent are posted in work areas.  
**CDC Stop the Spread of Germs** poster  
**CDC How to Protect Yourself** poster |
|                                                                          | Applies as is.                                                                                       |
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<tr>
<th>18. Make disinfectants available to workers throughout the worksite and ensure cleaning supplies are frequently replenished.</th>
<th>Ensure hand sanitizer and wipes are readily available.</th>
<th>Applies as is.</th>
</tr>
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<tr>
<td>19. Frequently clean and disinfect high-touch surfaces on job sites and in offices, such as shared tools, machines, vehicles and other equipment, handrails, doorknobs, and portable toilets. If these areas cannot be cleaned and disinfected frequently, the jobsite shall be shut down until such measures can be achieved and maintained.</td>
<td>Wipe down equipment, touch surfaces and vehicles per current guidance. Follow Facilities Standard Daily and Weekly Cleaning &amp; Disinfecting Chart Use disinfecting surfaces PASP# 20200416B on safety web page.</td>
<td>Applies as is.</td>
</tr>
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<td>20. When the worksite is an occupied home, workers should sanitize work areas upon arrival, throughout the workday and immediately before they leave, and occupants should keep a personal distance of at least 10 feet.</td>
<td>Not applicable.</td>
<td>Crews Quarters Applies as-is. Ops</td>
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<tr>
<td>21. If an employee reports feeling sick and goes home, the area where that person worked should be immediately disinfected.</td>
<td>If on an active job site, notify the contractor’s COVID-19 Supervisor. Follow process for Pre-Construction Field Work. Follow current guidance posted on the WSDOT Intranet page under Tools and Resources. Contact Facilities to ensure disinfection protocol is completed.</td>
<td>WSF currently operates under general WSDOT directives and the guidelines defined in the following agency communications: Safety Bulletin 0920 Safety Bulletin 1220 Safety Bulletin 1320 Safety Bulletin 1820 Quick Notice 16357</td>
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### Employee Health/Symptoms

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<tr>
<td>22.</td>
<td>Create policies which encourage workers to stay home or leave the worksite when feeling sick or when they have been in close contact with a confirmed positive case. If they develop symptoms of acute respiratory illness, they must seek medical attention and inform their employer. Follow leave polices and perform health screening via ReadyOp daily.</td>
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<tr>
<td>23.</td>
<td>Have employees inform their supervisors if they have a sick family member at home with COVID-19. If an employee has a family member sick with COVID-19, that employee must follow the isolation/quarantine requirements as established by the State Department of Health. Follow current guidance posted on the WSDOT Intranet page under Tools and Resources.</td>
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<tr>
<td>24.</td>
<td>Screen all workers at the beginning of their shift by taking their temperature and asking them if they have a fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell. Thermometers used shall be ‘no touch’ or ‘no contact’ to the greatest extent possible. If a ‘no touch’ or ‘no contact’ thermometer is not available, the thermometer must be properly sanitized between each use. Any worker with a temperature of 100.4°F or higher is considered to have a fever and must be sent home. Follow the contractor’s screening process or Use the ReadyOp attestation system. Ask employees to take their temperature at home prior to arriving at work or take their temperature when they arrive. Thermometers used at work shall be ‘no touch’ or ‘no contact’ to the greatest extent possible. If a ‘no touch’ or ‘no contact’ thermometer is not available, the thermometer must be properly sanitized between each use. Any worker with a temperature of 100.4°F or higher is considered to have a fever and must be sent home. COVID-19 Supervisor for each department and 2901.</td>
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<td>25. Instruct workers to report to their supervisor if they develop symptoms of COVID-19 (e.g., fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell). If symptoms develop during a shift, the worker should be immediately sent home. If symptoms develop while the worker is not working, the worker should not return to work until they have been evaluated by a healthcare provider.</td>
<td>Follow WSDOT policies, but notify the contractor’s COVID-19 supervisor. Applies except the requirement to be evaluated by a healthcare provider. The employee must continue self-quarantine for up to 7 days or additional 72 hours after the fever has gone and symptoms get better, whichever is longer. WSF currently operates under WSDOT directives and the guidelines defined in the following agency communications: Safety Bulletin 0920, Safety Bulletin 1520, Safety Bulletin 2120.</td>
</tr>
<tr>
<td>26. Failure of employees to comply will result in employees being sent home during the emergency actions.</td>
<td>Applies as-is.</td>
</tr>
<tr>
<td>27. Employees who do not believe it is safe to work shall be allowed to remove themselves from the worksite and employers must follow the expanded family and medical leave requirements included in the Families First Coronavirus Response Act or allow the worker to use unemployment benefits, paid time off, or any other available form of paid leave available to the worker at the workers discretion.</td>
<td>Employees will not be required to work if they believe it unsafe. Follow the COVID-19 Scenarios &amp; Benefits Available guidance posted on the OFM website to determine what leave may apply. Applies as is.</td>
</tr>
<tr>
<td>28. Any worker coming to work on a construction site in Washington from any state that is not contiguous to Washington must self-quarantine for 14 days to become eligible to work on a job site in Washington.</td>
<td>Not applicable. Applies to out of state vendors.</td>
</tr>
</tbody>
</table>
29. 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). The employer should instruct fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.

Notify the contractor’s COVID-19 Supervisor. Follow current guidance posted on the WSDOT Intranet page under Tools and Resources.

Follow current guidance posted on the WSDOT Intranet page under Tools and Resources. Applies as is.

Job Site Visitors

30. A daily attendance log of all workers and visitors must be kept and retained for at least four weeks. The log must include the name, phone number, and email address of all workers and visitors.


REFERENCES

- Governors Phase 1 Construction Restart- Proclamation
- Phase 1 Construction Restart Covid_19 Job Site Requirements
- WSDOT HQ Construction COVID-19 Construction Memos
- EPA disinfectants for COVID-19: https://www.epa.gov/coronavirus
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- OSHA COVID-19 resources: https://www.osha.gov/SLTC/covid-19/
- Hand washing: https://www.youtube.com/watch?v=d914EnpU4Fo&feature=youtu.be
- Washington State Department of Labor and Industries: Coronavirus (COVID-19) Prevention: General Requirements and Prevention Ideas for Workplaces
- USDOL Family First Coronavirus Response Act, effective April 1, 2020 – Dec. 31, 2020
- Face Coverings, Masks, and Respirator Choices: Washington Coronavirus Hazard Considerations for Employers