

Leading Builders of America

COVID-19 Response: Member Worksite Adaptations

In this time of crisis, residential construction is essential to providing shelter for American families. Critically, over 40,000 new homes are scheduled to be delivered in the next sixty days. Residential construction is also a pillar of the American economy, providing employment for millions of U.S. workers. This is why residential construction has been identified by the U.S. Department of Homeland Security's Cybersecurity and Infrastructure Security Agency (CISA) as an essential service industry during the nation's COVID-19 response (<https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce>.)

In today's unique environment, the challenge is delivering critically needed new housing while minimizing the health risk to our workforce. That workforce includes builders, suppliers, tradesmen and subcontractors. LBA recognizes that during the current crisis, additional safety procedures are needed to protect our workforce.

Residential construction, because of its inherent open-space workplaces, construction task decentralization, and staggered scheduling processes has been able to quickly adapt to the challenges presented by COVID-19. Members of Leading Builders of America, working with their trade partners and subcontractors, are in the process of implementing a number of key provisional jobsite practices to promote social distancing and help limit the potential for transmission of COVID-19. We are seeking to institute these practices in addition to our ongoing commitment to comply with all federal, state, and local health and safety requirements and ordinances, as well as special COVID-related recommendations made by OSHA.

Among the worksite adaptations being put in place are:

- Instructing all workers to regularly and thoroughly **wash hands** with soap and water or use alcohol-based hand sanitizers while on job sites.
- Posting CDC **guidelines for hygiene** in both English and Spanish, together with any locally required signage, in conspicuous locations on all construction sites.
- Recommending along with our trade partners and subcontractors that all workers perform a **daily health assessment** before leaving their home in the morning. If they have a fever, or are exhibiting any other COVID-19 symptoms, or other symptoms of sickness, or if they are in a high risk category, are required or advised to stay home, or have immediate or close family members who are sick, they should stay at home, notify their manager/employer and follow CDC guidelines.
- Requiring that any **worker who displays symptoms of COVID or other illness** to leave jobsites immediately, with notification given to the worker's appropriate management team.
- Requiring that all workers on a jobsite, **maintain a 6-foot distance** between one another whenever possible. Social distancing should also be maintained during all work breaks.

Workers who fail to maintain 6-foot social distancing are subject to reprimand by their appropriate builder, trade partner, or subcontractor employer.

- Having an on-site company **supervisor who will coordinate** and manage the COVID-19 response practices on each jobsite and perform regular jobsite inspections.
- Recommending, in cooperation with our trade partners and subcontractors, that workers on the jobsite **not share equipment or tools** except in instances where tools must be used by more than one worker. Recommending that workers give special consideration to sanitizing tools before being shared between workers.
- Continuing to require **usage of PPE when appropriate to job tasks**, along with encouraging the use of supplemental equipment, such as nitrile or latex gloves, when available. Encouraging trade partners and subcontractors to provide supplemental PPE to their own direct employees.
- Staggering or otherwise altering the **scheduling of trade partners** to minimize the number of trade teams working at a house at a time.
- **Prohibiting gatherings of 10 or more** people at any time on the jobsite, including during lunch and other breaks. Even under normal circumstances, houses under construction do not have more than ten people working in them at any given time.
- Recommending that all workers bring their own water jugs or bottled water to the jobsite; that jobsites cease providing communal drinking water coolers for the time being, and workers **avoid sharing food or personal items**.
- Managing **site deliveries** to limit direct contact between workers, and to minimize the overall headcount on the jobsite.
- Recommending that **the practice of ride-sharing** be discontinued until after the health crisis has abated.
- Cleaning and/or **sanitizing shared surfaces** frequently. Ensuring that portable jobsite toilets are regularly cleaned and/or sanitized. Recommending that **cleaning techniques** such as those employing pressurized air or water sprays not be used during this time in order to ensure that those processes do not result in the generation of bio-aerosols.
- Recommending that units be **cleared of all workers during inspections** to lessen the potential for cross-contamination between trade teams as inspectors or officials move between work areas.
- Conducting only **emergency/selective warranty service and customer care activity** on the interior of homes.
- Notifying builder site supervisors, COVID-response coordinators, trade partners and subcontractors that COVID-related **local and state site requirements**, when different from these workplace adaptations, will prevail on the jobsites.
- Establishing **practices to ensure proper reporting** and notifications should any worker who has been on the worksite be exposed to or diagnosed with COVID-19.

LBA members look forward to continuing a constructive dialogue with government and enforcement officials as we work together with our trade partners and subcontractors to implement these

measures on all our jobsites. OSHA and other regulators have developed enforcement tools to identify workplace safety violations, issue citations and in some instances closing individual construction sites until deficiencies have been addressed. These tools have proven effective to help preserve safe working conditions and should continue to be relied on. Responding to isolated workplace safety violations with an across-the-board moratorium on all construction would be overbroad, unfair to employers that are following workplace safety rules and undermine the industry's ability to provide shelter and jobs for American families.

As the COVID-19 health crisis continues to evolve, so too will LBA members' efforts to ensure that their jobsites are practicing common sense procedures to help reduce the possibility of transmission of the virus. Our members remain focused not only on safeguarding the health of our workers, but also on maintaining the commitment they have to thousands of current and future American homebuyers to complete their homes at a time when having a safe home has never been more important.