

## **PURPOSE**

To provide guidance to NRP Employees on how to prepare for and prevent the spread of new or newly evolved infectious diseases that have the potential to pose a significant public health threat and danger of infection to ourselves, our co-workers and our communities.

## **ENFORCEMENT**

This policy is to be enforced when directed by NRP leadership via company-wide communication. It will no longer be enforced when indicated by company-wide communication.

## **SCOPE**

All Field Employees, Subcontractors, and Suppliers

## **RESPONSIBILITY**

Assistant Superintendents  
 Director of Operations  
 Field Engineer  
 Field Superintendent  
 Project Superintendent  
 Regional Safety Director  
 Safety Coordinator  
 Safety Manager  
 Subcontractors  
 Suppliers  
 VP of Construction Operations  
 VP of Construction Safety

## **INFECTIOUS DISEASE SPREAD PREVENTION**

The health and well-being of our employees, subcontractors, and suppliers comes first, and we do not want to put them at risk of any type of exposure. Our most important line of defense is requiring all employees, subcontractors, and suppliers who may be sick, not feeling well, or may have been exposed to an individual who is sick to stay home. NRP offers ALL employees sick time with the expectation that it be used to take care of oneself or affected family members.

The following guidelines should be followed by all NRP staff, subcontractors, and suppliers.

- No toolbox talks or gatherings in the jobsite trailers.
- All meetings with ten or more people shall be held outside.
- Discontinue the use of community water, coffee, or food
- Employees and subcontractors will be required to leave the jobsite if they are displaying COVID-19 symptoms.
- Refrain from sharing cups, pens, pencils, plan-sets, tablets, laptops, tools, or any other items that may carry germs.
- Frequently washing hands. CDC recommends you wash your hands with soap and water for at least 20 seconds.
  - If facilities are not available, please use dissolving disinfectant liquid (Hand Sanitizer). Allow liquid time to dry and do not wipe off any excess.

- Avoid touching your eyes, mouth, and face.
- Avoid handshakes and close contact with team members, and always wash and sanitize your hands following any contact. Maintain 6 feet of separation as much as possible.
- Keep surface areas clean and disinfect regularly. (Please see Disinfection of Jobsite)
- Every time you apply any personal protective equipment (PPE) to your face, wash hands (as directed above) and then disinfect PPE.
- Wash Clothing and other Reflective Gear regularly.
- No Food Delivery Service or other similar services allowed to service job sites.
- Prior to Eating or Drinking on the job site, make certain to disinfect hands, bottles and surrounding surfaces.

While we do want to ensure the safety of our employees and jobsite workers we always have to keep in mind the laws and regulations under the Health Insurance Portability and Accountability Act (HIPAA) and the Americans with Disabilities Act (ADA). If it comes to your attention that an employee or jobsite worker at your project has become infected with a disease that is being monitored by the Center for Disease Control and Prevention (CDC) please reach out to the Safety Department by emailing [S- IW@nrpgroup.com](mailto:S-IW@nrpgroup.com) for further instruction. Should you have any questions regarding HIPAA and what we can enforce please reach out to your HR Business Partner for clarification. (see Disclosure of Information and Compliance with HIPAA and ADA)

#### **SUBCONTRACTOR RESPONSIBILITY**

Subcontractors must agree not to enter the jobsite if they have knowingly come into contact with anyone who has exhibited symptoms of the virus or have tested positive for the virus in the previous 2 weeks. We as the general contractor, have the right to ask any person to leave the jobsite should we feel they have an illness that is being monitored by the CDC.

Symptoms include:

- Fever
- Cough
- Shortness of breath
- Body Aches
- Sore throat

Each working day, Foreman on the jobsite are to email NRP Field Staff confirming workers they oversee are not exhibiting symptoms of the virus.

#### **FIELD STAFF DAILY LOG**

Field staff must collect emails from any Subcontractor onsite daily confirming workers they oversee are not exhibiting symptoms of the virus, receipt of this message must be logged in the Daily Report for the project.

#### **MEETINGS**

Meetings of 10 or more people must be held outdoors. Distancing of at least 6 feet between individuals should be maintained. Should meetings become ineffective due to distancing, meetings may be modified to communicate with smaller groups or individuals or be held as conference calls.

**SITE WALKS**

During site walks, if field staff encounter anyone exhibiting symptoms of illness, the individual will be told to leave immediately. A message regarding the individual's removal must immediately be sent to the subcontracting company, foreman, and [S-IW@nrpgroup.com](mailto:S-IW@nrpgroup.com).

**REPORTING OF POSITIVE TEST AND RISK MANAGEMENT**

If any individual tests positive for an infectious disease, subcontractor management must contact the Project Manager & Project Superintendent promptly with information about the trade the individual was performing. If a field staff employee of NRP tests positive, he or she must notify Lawry Kardos ([LKardos@nrpgroup.com](mailto:LKardos@nrpgroup.com) / 440-263-5944)

When a Project Manager or Project Superintendent receives notification of a positive test, he or she must immediately contact Human Resources via Lawry Kardos ([LKardos@nrpgroup.com](mailto:LKardos@nrpgroup.com) / 440-263-5944) , who will get in touch with local health authorities and CDC for guidance regarding appropriate measures to take. After reporting to Human Resources, begin identifying any individuals who would have interacted with the infected individual in the previous 2 weeks. Human Resources will coordinate with the Safety Department to communicate with those who were in contact with the infected individual to seek medical attention immediately. The Safety Department will coordinate communication and provide further guidance. The Executive VP of Construction must coordinate with Human Resources and Safety to determine how to proceed.

NRP may, under direction of Executive VP of Construction as a precaution and at the direction of the CDC and local Health Authorities, take one or all of the following preventative measures:

- Modify project schedule.
- Suspend the job site until further notice

**JOBSITE CLEANING SUPPLIES**

Make sure to keep the follow items stocked at all times in your job office.

- Hand Soap (if facilities are available on site)
- Hand Sanitizer
- Paper towels
- Disinfectant Spray (i.e. Lysol, Clorox, etc.)

**DISINFECTION OF JOBSITE**

High-touch surfaces, such as counter tops, doorknobs, cellphones and toilet flush handles should be disinfected regularly since some pathogens can live on surfaces for several hours or days. Use products that say "disinfectant" on the label and include an EPA registration number. These are required to meet government specifications for safety and effectiveness. First, you should remove dust and grime before using the disinfectant. Second, the disinfectant needs to remain on the surface before it dries or is wiped off. Check the label for wait times to make sure the virus kill is effective.

## POSTINGS

The following flier must be posted throughout the jobsite:



## ***SAFETY BULLETIN- COVID-19 JOBSITE PRACTICES***

Based on the continued emphasis on social distancing and related policies throughout the country due to COVID-19, we are making the following changes to the daily operations at NRP jobsites:

- NRP job trailer is to be kept to “Authorized” or “Essential” personnel only
  - Please post a sign on your door notifying them of access and providing information for them to contact you remotely if assistance is needed
- Cease weekly subcontractor meetings from being conducted in trailers
  - Conduct meetings in outside areas
  - If possible, conduct in larger rooms such as a clubhouse
  - Choose a space that will prevent any unnecessary physical contact and allows attendees to maintain the 6-foot safe social distance
- Cease showing of the Safety Orientation video
  - In lieu of playing the video, please have new subcontractors read and sign the Code of Safety Practices at a location outside of the job trailer and file the document as usual.
- Limit accepting or handling of paperwork from subcontractors if not necessary
- Look to rent hand washing stations to put on job site
  - Contact the company that currently rents your Portable Toilets to you
  - If they do not have any, please contact your safety manager to discuss some alternative options
- Keep hand sanitizer in stock and in trailer
  - Have hand sanitizer located by entry door for use immediately upon entry
    - The availability of hand sanitizer is very scarce currently. If you’re unable to get any, please contact your safety manager to work on alternative methods
    - Would recommend keeping any extra hand sanitizer stored in a safe, possibly locked, location
- Spray and disinfect door handle(s) periodically throughout the day
- Post Safety Bulletin on proper hand washing on construction sites

This is an ever-changing event and we will continue to keep a very close eye on the situation. As changes occur, we will update and redistribute as needed. Our goal is to put you all in the best situations to keep you safe and we feel the list provided above will help to achieve this goal.

## DEPLOYMENT OF HAND-WASHING FACILITIES

Hand-washing stations must be present on all jobsites. These stations must be maintained with soap and water. Hand-washing guidance must be posted on these stations (see below) along with instructions, in both English and Spanish, for who to contact if the station is inoperable or short of soap, water, or towels.

English:



## ***SAFETY BULLETIN-*** ***Hand Washing on Construction Sites***

### **PREVENTION CAN BE THE BEST MEDICINE!**

It is of the utmost importance to follow the CDC's hygiene recommendations on all NRP Project Sites.

### **WHEN?**

- After using the bathroom
- Before, during, and after preparing food
- Before eating food
- Before and after caring for someone at home who is sick with vomiting or diarrhea
- After changing diapers or cleaning up a child who has used the toilet
- After blowing your nose, coughing, or sneezing
- After touching an animal, animal feed, or animal waste
- After handling pet food or pet treats
- After touching garbage

### **HOW?**



**Wet** your hands with clean, running water (warm or cold), turn off the tap and apply soap.

**Lather** your hands by rubbing them together with the soap. Be sure to lather the backs of your hands, between your fingers, and under your nails.

**Scrub** your hands for at least 20 seconds. Need a timer? Hum the "Happy Birthday" song from beginning to end twice.

**Rinse** hands well under clean, running water.

**Dry** hands using a clean towel or air dry them.

**Keeping hands clean is one of the most important things we can do to stop the spread of germs and stay healthy.**

Spanish:



## *Boletín de Seguridad - Lavado de manos en sitios de construcción*

### **PREVENTION PUEDE SER LA MEJOR MEDICINA!**

Es de suma importancia seguir las recomendaciones de higiene de los CDC en todos los sitios del proyecto NRP.

#### **¿Cuándo?**

- Después de usar el baño
- Antes, durante y después de preparar los alimentos
- Antes de comer alimentos
- Antes y después de cuidar a alguien en casa que está enfermo de vómitos o diarrea
- Después de cambiar pañales o limpiar a un niño que ha usado el inodoro
- Después de sonarse la nariz, toser o estornudar
- Después de tocar un animal, alimento para animales o desechos animales
- Después de manipular alimentos para mascotas o golosinas para mascotas
- Después de tocar la basura

#### **¿Cómo?**



**Humedezca** las manos con agua limpia y corriente (caliente o fría), apague el grifo y aplique jabon.

**Enjabona** tus frotándolas con el jabon. Asegurese de envolver la part posterior de las manos, entre los dedos y debajo de las unas.

**Frota** tus manos durante al menos 20 segundos. ¿Necesitas un temporizador? Hum la canción “Feliz Cumpleanos” de principio a fin dos veces.

**Enjuague** bien las manos con agua limpia y corriente.

**Seque** las manos con una toalla limpia o sequelas al aire.

**Mantener las manos limpias es una de las cosas más importantes que podemos hacer para detener la propagación de gérmenes y mantenernos saludables.**

### **DISRUPTION IN OPERATIONS**

In the event your job site is inaccessible it is imperative that we track this occurrence in our daily reports along with any deliveries that had to be turned away.

### **SUPPLY CHAIN INTERRUPTIONS**

In the event that our standard approved vendors experience supply chain interruptions and are unable to procure needed supplies you must reach out to your VP and Director of Operations for further instructions.

**CONSEQUENCES OF POLICY VIOLATION**

Employees who fail to comply with this policy may be subject to appropriate disciplinary action, up to and including immediate termination of employment.

**MEDIA**

All incoming media requests must be directed to our Marketing department ([pr@nrpgroup.com](mailto:pr@nrpgroup.com)). They will direct all inquiries to the CDC and/or local health authorities, who are better qualified to answer their questions at that time. DO NOT answer any questions that might be asked by the media.

**Disclosure of Information and Compliance with HIPAA and ADA**

According to the U.S. Department of Health and Human Services (HHS), HIPAA privacy rules only apply to covered entities and business associates. Covered entities are health plans, health care clearinghouses, and those health care providers that conduct one or more covered health care transactions electronically, such as transmitting health care claims to a health plan. Business associates generally are persons or entities (other than members of the workforce of a covered entity) that perform functions or activities on behalf of, or provide certain services to, a covered entity that involve creating, receiving, maintaining, or transmitting protected health information.

Communications between employers and employees is governed by the HIPAA Privacy Rule. The rule would not apply when an employee tells an employer they have contracted an infectious disease or are self-isolating because they are displaying symptoms of an infectious disease. HIPAA would apply if an employer is informed about an employee testing positive, if the employer is notified about the positive test by the employer's health plan.

Protected Health Information (PHI) can be disclosed without first receiving authorization from a patient for treatment purposes, including treating the patient or treating other patients.

With a highly infectious disease, it is essential for public health authorities to be notified as they will need information in order to ensure public health and safety. It is permissible to share PHI with public health authorities such as the Centers for Disease Control and Prevention (CDC) and others responsible for ensuring the safety of the public, such as state and local health departments. These disclosures are necessary to help prevent and control disease, injury, and disability. In such cases, PHI may be shared without obtaining authorization from a patient.

Disclosures of PHI are also permitted to prevent and lessen a serious and imminent threat to a specific person or the public in general, provided that such disclosures are permitted by other laws. Such disclosures do not require permission from a patient. In such cases, these disclosures are left to the discretion and professional judgment of healthcare professionals about the nature and the severity of the threat.

<https://www.hipaajournal.com/hipaa-compliance-and-covid-19-coronavirus/>

The Americans with Disabilities Act (ADA) prohibits employers from asking questions that could force employees to disclose disabilities. The law only allows employers to ask about serious health conditions under a few circumstances. Those are:

1. If you've already disclosed that you have a medical condition and you are seeking a job accommodation under the ADA, or you are requesting medical leave. Then, employers are allowed to ask for documentation to verify the existence or severity of your health issue.
2. If an employer suspects that you're suffering from a condition that might cause you to be unable to perform your job, or might cause you to be unsafe on the job.