



Crane Agency

Sample COVID-19 Exposure, Prevention, Preparedness and Response Plan – Construction Industry

The novel Coronavirus, or COVID-19, is a respiratory disease caused by the SARS-CoV-2 virus. It has spread very rapidly throughout the world and in the United States. Current research indicates that [social distancing](#) is the most effective method to slow the spread of COVID-19. Research also suggests individuals are infectious before they show symptoms of the disease, and some can carry it without developing any symptoms at all. Therefore, it is likely that a percentage of individuals with COVID-19 may go undetected while spreading the virus.

Crane Agency has created a sample COVID-19 Exposure, Prevention, Preparedness, and Response Plan to assist clients during this time. Given the severe threat COVID-19 poses to healthcare systems and our most vulnerable population, it is recommended that all businesses who are currently operational and deemed as "essential" complete a [Hazard Recognition risk assessment, per OSHA guidelines](#). This evaluation will help determine risk levels for employees within your organization. We also suggest that businesses effectively communicate changes in policies and procedures related to COVID-19 to all employees. Completing a Hazard Recognition risk assessment is a crucial step to help prevent the rapid spread of this disease and decrease the risk to your workforce, their families, and your community, even if the number of cases in the areas surrounding your business is low.

The information provided throughout this document is reflective of current guidance available from the U.S. [Centers for Disease Control and Prevention](#) ("CDC") and the U.S. Department of Labor [Occupational Safety and Health Administration](#) ("OSHA"). This document is a "sample template" that individual contractors should review carefully and tailor to their work and job site needs. It does not constitute legal advice and should not be construed on its own as fulfilling a contractor's overall obligations to ensure a safe, and

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healthful work environment. This template is subject to change as updates from the CDC, OSHA, and other public officials become available. Contractors should review this information carefully and make adjustments based on local jurisdictional guidance, as well as operational needs.

Response Overview

At **(Insert Company Name)**, we take the health and safety of our employees very seriously. The novel Coronavirus or COVID-19, a respiratory disease caused by the SARS-CoV-2 virus, poses a significant threat to our healthcare system and our most vulnerable population. **(Insert Company Name)** has been deemed "essential" during this declared national emergency. To keep our employees and job sites safe, while maintaining operations, we will implement a COVID-19 Exposure Prevention, Preparedness, and Response Plan, detailed in this document.

All Managers and Supervisors must be familiar with this Plan and be prepared to answer questions from employees. Managers and Supervisors must always set a good example by following this Plan, which includes social distancing, as well as the practice of good personal hygiene and job site safety to prevent the spread of COVID-19. Managers and Supervisors must encourage these same behaviors from all employees.

Responsibilities of Managers and Supervisors

Strong actions are required to stop the spread of COVID-19. Below are some recommended steps:

1. Determine each employee's exposure risk classification, corresponding controls, and PPE needs as indicated in OSHA Publication #3390, titled "Guidance on Preparing Workplaces for COVID-19". This document can be found on the OSHA website and is linked here: <https://www.osha.gov/Publications/OSHA3990.pdf>. It is critical to revisit and review this information frequently because guidance has, and will continue to change as we learn more about COVID -19.

April 3, 2020 Update: CDC continues to study the spread and effects of the novel Coronavirus across the United States. Recent studies show a significant portion of

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Responsibilities of Managers and Supervisors (continued)

individuals with COVID-19 lack symptoms ("asymptomatic"). Research also indicates those who are "pre-symptomatic" can transmit the virus to others even before showing signs of illness. This means that the virus can spread between people interacting in close proximity—for example, speaking, coughing, or sneezing—even if those people are not exhibiting symptoms. In light of this new evidence, CDC recommends wearing cloth face coverings in public settings where other social distancing measures are challenging to maintain (e.g., grocery stores and pharmacies), **especially** in areas of significant community-based transmission.

It is critical to emphasize that maintaining 6-foot social distancing remains essential to slowing the spread of the virus. CDC is additionally advising the use of simple cloth face coverings to slow the spread of the virus and help people who may have the virus and do not know it from transmitting it to others. Cloth face coverings fashioned from household items or made at home from common materials at low cost can be used as an additional, voluntary public health measure. For further information, please review the CDC "[Recommendation Regarding the Use of Cloth Face Coverings](#)".

2. Close office(s) and production areas to nonessential staff and visitors;
 - a. Determine who can work from home and for who it is necessary to be at the office.
 - b. Implement no-touch trashcans.
 - c. Supply hand sanitizer, wipes, and other sanitization tools at entrances and other key locations.
 - d. Adapt office/operations to accommodate at least six-foot distance between team members, implement multiple shifts, alternating days off if possible, and [ensure proper physical /social distancing](#) guidelines can be met and enforced.
 - e. Move potentially infectious people to a location away from other employees and provide them with a mask until they can be sent home and for medical follow up.
3. Provide the appropriate technology to support remote work (telework) where applicable;
 - a. Invest in virtual communication tools such as Microsoft Teams, etc.
 - b. Ensure that your team members understand how to use the technology provided and which tools to use in specific cases.

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Responsibilities of Managers and Supervisors (continued)

4. Postpone all work-related travel, both international and national;
 - a. Postponing all nonessential personal travel is recommended. If you must travel, take necessary precautions recommended by health authorities to prevent being infected by COVID-19.
5. Supervisors will provide employees with up-to-date education and training on COVID-19 risk factors and protective behaviors (e.g., cough etiquette and care of PPE).
 - a. Training should include necessary instruction on how to use protective clothing and equipment in the context of their current and potential duties.
 - b. PPE guidance should demonstrate how to put it on, use/wear it, and take it off correctly.
 - c. All training materials should be easy to understand and available in the appropriate language and literacy level for all employees.
6. Establish Management Groups where appropriate. These groups may include a "Task Force" to keep track of COVID-19 developments in **(Insert City, County, and State)**. A group or task force may also be needed to monitor available CDC and OSHA guidance on the virus and adapt employee communications and work operations.
 - a. Schedule regular weekly meetings with all team members to ensure that everyone is engaged.
 - b. Schedule at least a bi-weekly check-in with your group/task force to update your company response based on recent developments.
 - c. Review any employee/supervisor ideas and concerns submitted with the company management team for implementation.
 - d. Anticipate a loss in productivity from your team members due to the stressful situation and be sensitive to this fact.
7. [Perform worksite/job site cleaning according to best practices as indicated by the CDC](#) and current COVID -19 threat at the company as required by regulatory agencies.
 - a. Strictly maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
 - b. When choosing cleaning chemicals, consult information on the Environmental Protection Agency ("EPA") [approved disinfectants for use against the SARS-COV-2 list](#).

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Responsibilities of Managers and Supervisors (continued)

- c. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses.
 - d. Follow the manufacturer's instructions for the use of all cleaning and disinfection products (e.g., concentration, application method, and contact time, PPE).
8. Constant employee communication and morale is essential. Expect higher levels of stress and anxiety among employees, as well as feelings of isolation from working remotely.
- a. Management and Supervisors should frequently communicate with employees to ensure that everyone is handling stress well, and offer support as needed.

Job Site Protective Measures

(Insert Company Name) has instituted the following protective measures at all job sites.

1. General Safety Policies and Rules

- a. Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the job site and return home.
- b. Safety meetings will be by telephone, if possible. If safety meetings are conducted in-person, attendance will be collected verbally, and the foreman/superintendent will sign-in each attendee. Participation will not be tracked through passed-around sign-in sheets or mobile devices. During any in-person safety meetings, avoid gathering in groups of more than ten people, and participants must remain at least six (6) feet apart.
- c. Employees must avoid physical contact with others and direct employees/contractors/visitors to increase personal space to at least six (6) feet, where possible. Where work trailers are used, only necessary employees should enter the trailers, and all employees should maintain social distancing while inside the trailers.
- d. All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone.

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Job Site Protective Measures (continued)

- e. Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- f. The company understands that due to the nature of our work, access to running water for handwashing may be impractical. In these situations, the company will provide no less than 60% alcohol-based hand sanitizers or wipes.
- g. Employees should limit the use of co-worker's tools and equipment. To the extent tools must be shared, the company will provide no less than 60% alcohol-based wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- h. Employees are encouraged to limit the need for N95 respirator use by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
- i. Should the use of any respiratory protection be necessary, Table 1 shall be followed to select the appropriate protection.
 - <https://www.osha.gov/silica/Table1sect1926.1153.pdf>
- j. The company will divide crews/staff into two (2) groups where possible so that projects can continue working effectively if one of the split teams is required to quarantine.
- k. As part of the division of crews/staff, the company will designate employees into dedicated shifts, at which point, employees will remain with their dedicated shift for the remainder of the project. If there is a legitimate reason for an employee to change shifts, the company will have sole discretion in making that alteration.
- l. Employees are encouraged to minimize ridesharing. While in a vehicle, employees must ensure adequate ventilation.

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Job Site Protective Measures (continued)

- m. If practical, employees should use/drive the same truck or piece of equipment every shift.
- n. In place of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

(Insert any additional precautions specific to your Business/Operations/Projects)

2. Workers entering Occupied Building and Homes

- a. When employees perform construction and maintenance activities within occupied homes, office buildings, and other establishments, these work locations present unique hazards with regards to COVID-19 exposures. All such workers should evaluate the specific risks when determining best practices related to COVID-19.
- b. During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The company will provide alcohol-based wipes for this purpose.
- c. Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.
- d. Should a contractor enter an occupied residence to perform work duties, he or she shall make contact with the occupant over the phone daily, to qualify the situation.

3. Job Site Visitors

- a. Visitors at a job site, including inside the trailer or office, will be limited to only those who are necessary.

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Job Site Protective Measures (continued)

- b. All visitors will be screened in advance of arriving on the job site. If the visitor answers "yes" to any of the following questions, he/she should not be permitted to access the job site:
 - 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 have 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?
- c. Site deliveries will be permitted but should be appropriately coordinated in line with the employer's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if possible.

4. Personal Protective Equipment and Work Practice Controls

- a. In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
 - Gloves: Gloves should always be worn while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the job, then any kind of glove is acceptable, including latex gloves. Employees should avoid sharing gloves.
 - Eye protection: Eye protection should always be worn while on-site.
 - Employees should wear N95 respirators if required by the work and if available.
- b. Due to the current shortage of N95 respirators, the following Work Practice Controls should be followed:
 - Keep dust down by using engineering and work practice controls, specifically using water delivery and dust collection systems.
 - Limit exposure time to the extent practical.

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Job Site Protective Measures (continued)

- Isolate workers in dusty operations by using a containment structure or distance to limit dust exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.

- c. A rigorous housekeeping program should be implemented to reduce dust levels on the job site.

Job Site Cleaning and Disinfecting

The company has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas.

- Jobsite trailers and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper personal protective equipment ("PPE"), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.
- Any trash collected from the job site must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable job site toilets should be cleaned by the leasing company at least twice per week and disinfected on the inside. The company will ensure that hand sanitizer dispensers are available and filled. Frequently touched items (i.e., door pulls and toilet seats) will be disinfected often.
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- If an employee 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 company will clean those areas of the job site that a confirmed-positive individual may have come into contact with before employees can access that workspace again.
 - <https://www.osha.gov/Publications/OSHA3990.pdf>

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Job Site Cleaning and Disinfecting (continued)

- The company will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (these can be used if appropriate for the surface).
- The company will maintain Safety Data Sheets of all disinfectants used on site.

(Insert any additional cleaning requirements if you use hazardous chemicals on site.)

COVID-19 - Drug Testing & Fleet Safety Compliance

Employee Drug Testing

(Insert Current Employee Drug Test Policy)

Because of the increased risk, facility closures, unavailability of testing sites, and supply shortages, many companies are suspending previously required employee drug testing. All businesses need to communicate how they will handle pre-employment, random, reasonable suspicion, and post-accident drug testing in light of the new realities presented by COVID-19. Please specify your policy in this section.

Drug Testing for DOT-regulated CDL Drivers

As a U.S. [Department of Transportation](#) ("DOT") regulated employer, **(Insert Company Name)** must comply with all applicable DOT drug testing requirements. In light of COVID-10, however, compliance with DOT-required post-accident and random drug and alcohol testing may not be possible because of a lack of collection sites, Breath Alcohol Technicians (BAT), Medical Review Officers (MOR), and Substance Abuse Professionals (SAP). **(Insert Company Name)** will make all reasonable efforts to locate the necessary resources, including mobile collection services if fixed-site collection services are unavailable.

If **(Insert Company Name)** is not able to find a provider to conduct DOT drug or alcohol testing due to supply shortages, facility closures, or state or locally impose quarantine requirements – or other impediments – we will contact the employee to document why the

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COVID-19 - Drug Testing & Fleet Safety Compliance (continued)

testing was not completed. Also, if the employee feels uncomfortable – or is afraid to go to a clinic or collection site for a drug test – we will work the employee to verify that the collection site has taken necessary precautions to minimize the risk of exposure to COVID-19.

Because of DOT regulations, newly hired operators of CDL equipment cannot perform safety-sensitive driving duties until a "negative" pre-employment drug test is documented.

DOT Hours-of-Service Rules

Because of a recent relief order by the DOT, some drivers may now be exempted from the requirements in Parts 390 through 399 of the [Federal Motor Carrier Safety Regulations](#) (FMCSRs) through May 15, 2020, and includes rules for hours of service, driver qualification, and vehicle inspection, among others. Please contact **(Insert Supervisors Name)** to see if your position qualifies for the exemption. Drivers who are eligible for the exemption do not need to carry any documentation when using the exception, but may not drive while too ill – or too fatigued – to drive safely. For more information, please see "[Expanded Emergency Declaration Under 49 CFR § 390.23 No. 2020-002 \(Relating to COVID-19\)](#)".

Responsibilities of Employees

Maintain best practices to ensure successful remote work capabilities:

- **Communication:** Frequently communicate the status of on-going projects and daily work to your Manager. There is no such thing as over-communication; however, please use online notifications respectfully.
- **Tolerance:** Assume the best of intentions with written messaging. Without in-person interaction, it may be harder to interpret the meaning and tone of a message.
- **Availability:** Some team members may be caring for family members at home. Please advise your co-workers of your schedule and circumstances, so that we can best adapt workflows at this time.
- **Scheduling:** Divide your day in deep work when you prefer not to be disturbed, and shallow work when you are available to colleagues. Communicate these schedules with management and your colleagues.

To minimize the spread of the virus, we must all do our part. The best way to prevent illness is to avoid exposure to COVID-19. As set forth below, **(Insert Company Name)** has instituted

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Responsibilities of Employees (continued)

various best practices at your jobsites and throughout our organization. All employees must follow these guidelines. If an employee a specific question about this Plan or COVID-19, please ask your Manager or Supervisor. If your Manager or Supervisor cannot answer the question, please contact **(Insert Individual's Name and Title)**.

OSHA and the CDC have provided the following preventative guidance to all workers, regardless of exposure risk to help [stop the spread](#):

- Frequently wash your hands with soap and water for at least 20 seconds. Employees should always wash their hands when they are visibly soiled and after removing any PPE.
- [Handwashing signage should be posted in the restrooms.](#)
- When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering your face for coughs and sneezes.
- Avoid close contact with people who are sick.
- Surgical masks, N95 respirators, or homemade cloth face coverings may be a tool to reduce COVID-19 transmission. They should be used per OSHA guidelines based on the risk level of those employees. Risk levels can be found at the following link: <https://www.osha.gov/Publications/OSHA3990.pdf>.

[CDC also recommends the use of cloth face coverings to help slow the spread](#), which should:

- Fit snugly but comfortably against the side of the face
- Be secured with ties or ear loops
- Include multiple layers of fabric
- Allow for breathing without restriction
- Be able to be machine laundered and dried

Employees must familiarize themselves with the [symptoms of COVID-19, as defined by the CDC](#). Employees must report to their Manager or Supervisor immediately if they are experiencing any signs or [symptoms of COVID-19](#).

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Responsibilities of Employees (continued)

Symptoms of COVID-19 may appear 2-14 days after exposure to the virus and can include:

- Fever
- Cough
- Shortness of breath/difficulty breathing
- Chills
- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell

If an employee develops a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT COME TO WORK and call your healthcare provider right away. Likewise, if an employee comes into close contact with someone showing these symptoms, call your healthcare provider right away and then call your supervisor or Human Resources at (Insert Individual's Name and Title).

During this time, please take the appropriate amount of time off to recover from illness. A note from your doctor is not needed to take sick leave during this time, as not to overwhelm our medical system. Any absence due to illness will automatically be approved, and compensation for sick leave will be administered per company guidelines.

CDC Interim Guidance for Persons with COVID-19 (not in Healthcare Settings)

For Persons with COVID-19 Under Isolation:

The decision to discontinue isolation^[1] should be made in the context of local circumstances. Options now include both;

- 1) A time-since-illness-onset and time-since-recovery (non-test-based) strategy, and**
- 2) A test-based strategy.**

- 1. Time-since-illness-onset and time-since-recovery strategy (non-test-based strategy)^[2]**

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CDC Interim Guidance for Persons with COVID-19 (continued)

Persons with COVID-19 who have symptoms and received direction to care for themselves at home may discontinue isolation under the following conditions:

- At least three days (72 hours) have passed *since recovery* defined as resolution of fever without the use of fever-reducing medications **and**
 - Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and,**
 - At least seven days have passed *since symptoms first appeared*.
2. **Test-based strategy** (simplified from initial protocol) Previous recommendations for a test-based strategy remain applicable; however, a test-based approach is contingent on the availability of ample testing supplies and laboratory capacity as well as convenient access to testing. For jurisdictions that choose to use a test-based strategy, this protocol has been simplified so that *only one swab is needed at every sampling*.

Persons who have COVID-19 who have symptoms and received direction to care for themselves at home may discontinue isolation under the following conditions:

- Resolution of fever without the use of fever-reducing medications **and,**
- Improvement of any respiratory symptoms (e.g., cough, shortness of breath) **and,**
- Negative results of an FDA Emergency Use Authorized Molecular Assay for COVID-19 from at least **two** consecutive nasopharyngeal swab specimens collected ≥ 24 hours apart^[3] (total of two negative specimens).

Persons with laboratory-confirmed COVID-19 who have not had any symptoms may discontinue isolation when at least seven days have passed since the date of their first positive COVID-19 diagnostic test and have had no subsequent illness provided they remain asymptomatic. For three days following discontinuation of isolation, these persons should continue to limit contact (stay 6 feet away from others) and limit the potential of dispersal of respiratory secretions by wearing a covering for their nose and mouth whenever they are in settings where other people are present. In community settings, this covering may be a barrier mask, such as a bandana, scarf, or cloth mask. This covering does not refer to a medical mask or respirator.

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Footnotes: CDC Interim Guidance for Persons with COVID-19

[1] Note that recommendations for discontinuing isolation in persons known to be infected with COVID-19 could, in some circumstances, appear to conflict with recommendations on when to discontinue quarantine for persons known to have been exposed to COVID-19. CDC recommends 14 days of quarantine after exposure based on the time it takes to develop illness if infected. Thus, it is possible that a person known to be infected could leave isolation earlier than a person who is quarantined because of the possibility they are infected.

[2] This recommendation will prevent most but cannot prevent all instances of secondary spread. The risk of transmission after recovery, is likely substantially less than that during illness; recovered persons will not be shedding large amounts of virus by this point if they are shedding at all. Certain employers can choose to apply more stringent criteria for certain returning workers where a higher threshold to prevent transmission is warranted. These criteria can include requiring a longer time after recovery or requiring they get tested to show they are not shedding virus. Such persons include [healthcare workers](#) in close contact with vulnerable persons at high-risk for illness and death if those persons get COVID-19. It also includes persons who work in critical infrastructure or with high-value human assets (e.g., military) where introduction of COVID-19 could cause major disruptions or reduce national security. Lastly, persons who have conditions that might [weaken their immune system](#) could have prolonged viral shedding after recovery. Such persons should discuss with their healthcare provider how best to assess if they are safe to return to work; this might include getting tested again to show that they are not shedding virus.

[3] All test results should be final before isolation is ended. Testing guidance is based upon limited information and is subject to change as more information becomes available.

Additional COVID-19 References & Resources

- [AGC Sample COVID Safety Response Plan 3/2020](#)
- [CDC Coronavirus \(COVID-19\) Resource Page](#)
- [CDC Signage & Print Resources](#)
- [Coronavirus.gov – White House, CDC & FEMA COVID-19 Guidance](#)
- [Federal Motor Carrier Safety Administration](#)
- [Founder Institute Sample Coronavirus Plan for Businesses](#)
- [OSHA Publication #3990 3/2020](#)
- [OSHA COVID-19 Standards](#)
- [Department of Transportation Coronavirus Resources](#)

You can also find additional resources on the Crane Agency website:

- [Crane Agency.com Coronavirus-Preparedness-Resources 3/2020](#)
- [Crane Risk Management COVID-19 FAQs 3/2020](#)

Please contact your Crane Agency Broker Team with questions.