Implementing and communicating appropriate work policies and procedures:

Given the nature of the pandemic, we need to have good methods in place to ensure that risk of exposure to COVID-19 is identified and managed. Following good risk management, prompt identification and isolation of sick people, where/if appropriate is important in order to protect workers, customers, and others at a worksite.

- OSHA standards, including those for personal protective equipment (PPE, 29 CFR 1910.132) and respiratory protection (29 CFR 1910.134), require employers to assess the hazards to which their workers may be exposed.
- In assessing potential hazards, employers should consider whether or not their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus.
- Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.
- The OSHA Control and Prevention page provides guidance for controlling exposures among workers with risk.

If you haven't already done this, one place to start is to go through OSHA's exposure risk pyramid for reach category of employees and then implement controls based on the effectiveness pyramid (hierarchy of controls) (https://www.osha.gov/Publications/OSHA3990.pdf)
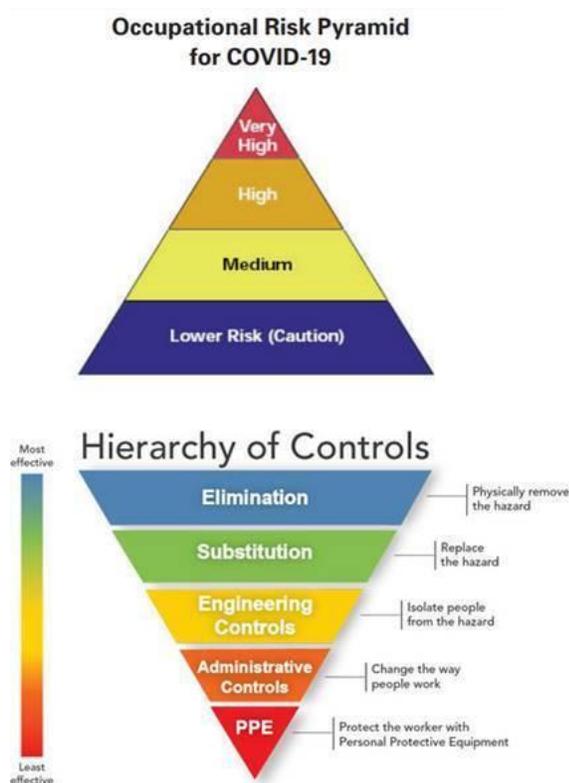
Just for reference, "lower risk (caution)" jobs on the COVID-19 risk pyramid are those that do not require contact with people known to be, or suspected of being, infected with COVID-19, nor frequent close contact with (i.e., within six feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

Per OSHA, additional engineering controls are not recommended for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended. Additional PPE is not recommended for workers in the lower exposure risk group. Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks, but different tasks can change risk category. For example, if workers are having frequent and/or close contact with (i.e., within six feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients, then they move to the medium risk category (see PPE section below for some resources and thoughts on this).

Follow good housekeeping procedures:

- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
- When choosing cleaning chemicals, employers should consult the Environmental Protection Agency's (EPA) COVID-19 disinfectant list (https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2).
- If a sick employee is suspected or confirmed to have COVID-19, follow the CDC cleaning and disinfection recommendations, which have PPE requirements, change depending on the site and operations characteristics, surfaces, and tools/clothing involved.
- FR clothing and tools should be disinfected per the manufacturers recommendations.
    - o Tyndale, for example, states that AR/FR should never be laundered with bleach, as bleach can hamper the performance of AR/FR clothing over time, so they've provided some recommendations: https://tyndaleusa.com/blog/2020/03/23/frc-safety-during-covid-19-disinfecting-frc/.

Once risk levels are identified, consider the best practices to minimize or eliminate them:

Changing the way lineworkers interact and perform work might be one of the best ways to do this, but it means trying to enforce distancing at all times. If you are considering mutual aid, you will need to consider the additional precautions required to keep distance among crews in housing, working, and feeding situations. For more information see, among other things, the mutual aid section of the Electricity Subsector Coordinating Council (ESCC) resource guide at: https://www.electricitysubsector.org/ (starting on page 23 for version 2)

Job briefing and morning meet-up considerations:

- Consider processes and/or procedures that minimize face-to-face contact between employees or assign work tasks that allow them to maintain a distance of six feet from other workers, customers and visitors, or to telework if possible.
- Use a digital system for recording job-site briefings and allow signoff on documents that formerly had to be paper by a digital method, such as text to a supervisor.
- Use multiple vehicles for a single crew where before there might have been one.

- Have all crews muster at different locations in the morning, such as a substation, to further segment work groups.
- Sanitize touchpoints on tools after each use, or ensure each crewmember has their own separate equipment.
- Eliminate co-work as much as possible (adding N-95 masks because two people are working closer than six feet will likely require arc-flash protection in some situations – e.g. face shields).

Equipment pickup considerations:

- Coordinate by radio or cellphone on equipment pickup so that only one crew representative is gathering equipment at a time.
- Ensure there are methods to keep distance in an equipment warehouse (e.g. everyone understands that only on person is allowed in a warehouse row at a time).

Implement engineering controls if needed:

Engineering controls involve isolating employees from work-related hazards. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement. Engineering controls for COVID-19 include:
- Installing high-efficiency air filters.
- Increasing ventilation rates in the work environment.
- Installing physical barriers, such as clear plastic sneeze guards.

Implement administrative controls if needed:

Administrative controls require action by the worker or employer. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard. Examples of administrative controls for COVID-19 include:
- Encouraging sick workers to stay at home.
- Minimizing contact among workers, clients, and customers by replacing face-to-face meetings with virtual communications and implementing telework if feasible.
- Establishing alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full onsite work week.

Personal Protective Equipment (PPE) considerations:

Lineworkers will need all of their regular PPE, but for situations where employees are exposed to risk related to COVID-19, you'll need to determine the level of risk and apply PPE accordingly. The proper way to do this can be found in the OSHA guidance at https://www.osha.gov/Publications/OSHA3990.pdf, but the short version of employer requirements is: Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs. The types of PPE required during a COVID-19 outbreak will be based on the risk of being infected with COVID-19 while working and job tasks that may lead to exposure.

As a refresher, the same standard APPA Safety Manual rules apply to COVID-19 related PPE:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted, as applicable (e.g., respirators).
- Consistently and properly worn when required.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

A brief overview of respirator requirements:
- A respirator (N-95 or higher-level) should be used if you are entering a customer's premises where there is a confirmed or suspected COVID-19 case, and you cannot maintain six-foot social distancing.
- Workers requiring a respirator will need to be fit tested (within the last two years and for the model you will be using), medically cleared, and properly trained on the use of the respirator. See OSHA's Respiratory Protection standard, 29 CFR 1910.134 at www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134
- OSHA's Respiratory Protection eTool may be of assistance https://www.osha.gov/SLTC/etools/respiratory/index.html
- Lots of helpful respirator videos can be found at: https://www.cdc.gov/niosh/topics/respirators/
- When disposable N95 filtering facepiece respirators are not available, consider using other respirators that provide greater protection and improve worker comfort https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html. Please note that homemade respirators do not constitute PPE because the protection they afford is unknown.

Please see these general resources for more information:
- https://www.osha.gov/SLTC/covid-19/controlprevention.html
- https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html
- https://www.electricitysubsector.org/
- https://www.publicpower.org/resource/information-about-coronavirus
- https://www.publicpower.org/covid-19-webinar-recordings (some of the practices outlined above have been discussed on these)