

Consolidated Electrical Contractors: COVID-19 Exposure Prevention, Preparedness, & Response Plan For Field & Office Work

Consolidated Electrical Contractors takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. This is particularly true for the construction industry, which has been deemed “essential” during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented throughout CEC and at all of our jobsites. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. CEC may also amend this Plan based on operational needs.

I. Responsibilities of Managers and Supervisors

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.



II. Responsibilities of Employees

We are asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites, we all must play our part. As set forth below, CEC has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask your manager or supervisor. If they cannot answer the question, please contact **Robert Werbrouck**.

OSHA and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. 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 for coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK** and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away and contact **Lisa Bozung**.



III. Job Site Protective Measures

CEC has instituted the following protective measures at all jobsites.

A. *General Safety Policies and Rules*

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- Safety meetings will be by telephone, if possible. During any in-person safety meetings or Toolbox Talk viewings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart. Toolbox Talk participation should be handled individually as much as possible; if a single person is logging participation on a device, they shouldn't allow others to use the device.
- 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.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone.
- 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.
- CEC understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, CEC will provide alcohol-based hand sanitizers and/or wipes.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, CEC will provide alcohol-based cleaner to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- 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.



- Employees are encouraged to wear a face mask while ride-sharing. While riding in company vehicles employees must wear a face mask when there are more than one person in the vehicle.
- Avoid shaking hands. Instead, opt for non-contact forms of greeting.
- If practicable, employees should use/drive the same truck or piece of equipment every shift.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

B. Workers entering Occupied Building and Homes

- 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 hazards when determining best practices related to COVID-19.
- During this work, employees must sanitize the work areas, tools, & vehicles upon arrival, throughout the workday, and immediately before departure. CEC will provide alcohol-based cleaner in individual spray bottles for this purpose.
- 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.

C. Job Site Visitors

- The number of visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.
- 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 jobsite:
 - 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 has 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?
- Site deliveries will be permitted but should be properly coordinated in line with the employer's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
 - Eye protection: Eye protection should be worn based on task being completed and job site requirements.
 - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Employees should wear N95 respirators if required by the work and if available.
- Wearing disposable facemasks is highly encouraged. If disposable facemasks are not available, individuals can wear multi-layer cotton facemasks that must not be shared and must be cleaned after every shift by the individual wearing it.
- 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 through the use of water delivery and dust collection systems.
 - Limit exposure time to the extent practicable.
 - 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.



IV. Job Site Cleaning and Disinfecting

CEC 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 jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider. During this work, employees must sanitize the work areas, tools, & vehicles upon arrival, throughout the work day, and immediately before departure. CEC will provide alcohol-based cleaner in individual spray bottles for this purpose.
- 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, CEC will clean those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that workspace again.
- CEC 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).



V. Jobsite Exposure Situations

- **Employee Exhibiting COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). CEC will similarly require an employee that reports to work with symptoms to return home until they are symptom free for 72 hour (3 full days). To the extent practical, employees are required to obtain a doctor's note clearing them to return to work.

- **Employee Tests Positive for COVID-19**

An employee that tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least seven (7) days have passed since the date of his or her first positive test, and have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;¹ and (2) at least seven (7) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. CEC will require an employee to provide documentation clearing their return to work.

- **Employee Has Close Contact with a Tested Positive COVID-19 Individual**

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to self-quarantine for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

If CEC learns that an employee has tested positive, CEC will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

¹ Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).



VI. CEC Daily Crew Health Assessment

CEC will be conducting daily crew health assessments to ensure our jobsites stay hazard-free. Prior to the beginning of work every day, employees will need to fill-out a short questionnaire related to potential contact with COVID-19 infected individuals and COVID-19 symptoms. The questionnaire must be completed before starting work.

VII. Office Protective Measures

A. General Safety Policies and Rules

- Stay home if you are sick
 - Inform Lisa Bozung V.P. of Admin if you have a sick family member at home with COVID-19.
- Wash your hands often with soap and water for at least 20 seconds. Use hand sanitizer with at least 60% alcohol if soap and water are not available. We will do our best to have this available at all our offices.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow. Throw used tissues in the trash and immediately wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer containing at least 60% alcohol. Learn more about coughing and sneezing etiquette on the CDC website.
- Clean AND disinfect every 3 hours common touched objects and surfaces such as workstations, keyboards, telephones, handrails, bathroom and doorknobs. (In put; clean all surfaces in the morning when you arrive to your office or work stations, repeat the process at lunch time, and before you leave. Dirty surfaces can be cleaned with soap and water prior to disinfection. Other Areas may be assigned in each office. Cleaning products should be at least 60% alcohol based, which will we have available.
 - Focus on high-touch areas — that’s faucet handles, doorknobs, stair rails and countertops — the things that you have your hands on all the time.”



- Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If and when you use shared devices in the offices you must clean the service areas you touch before leaving device or equipment; THIS IS A MUST.
- Please do not congregate for your breaks/lunches stagger them to ensure social distancing
- Practice social distancing by maintaining distance (approximately 6 feet or 2 meters) from others when possible. Replace physical contact greetings (e.g. shaking hands) with non-contact forms.
- Wear a mask anytime you are moving throughout the office, CEC will have mask available; if you cannot maintain 6 feet, all parties must wear a mask.
- If you have an individual office with a door, it is recommended that you close your door while working in your office. Mask are not required if your the only one in you're office
- Meetings with non-CEC team members should be held virtually whenever possible. Any and all visitors will need to be screened before entering an office.

VIII. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, CEC will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires construction employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. "In-patient" hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an "illness." However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.



If an employee has a confirmed case of COVID-19, CEC will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

CEC's assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, CEC will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

IX. "Essential" Industry

Several States and localities are issuing orders that prohibit work and travel, except for essential businesses. In general, construction work has been deemed essential and CEC is committed to continuing operations safely. If upon your travel to and from the worksite you are stopped by State or local authorities, you will be provided a letter that you can show the authorities indicating that you are employed in an "essential" industry and are commuting to and from work.

X. Confidentiality/Privacy

Except for circumstances in which CEC is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of an employee's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. CEC reserves the right to inform other employees that a co-worker (without disclosing the person's name) has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health.



XI. General Questions

Given the fast-developing nature of the COVID-19 outbreak, CEC may modify this Plan on a case-by-case basis. If you have any questions concerning this Plan, please contact **Lisa Bozung**.

I have read, understand, and agree to abide by the above policies in order to provide a safe working environment for myself, as well as my coworkers.

Print Name

Signature

Date