

**PLANNING CONSIDERATIONS FOR COVID-19 CONTACT TRACING
IN THE ELECTRIC POWER INDUSTRY
MAY 11, 2020**

OVERVIEW:

As organizations begin to consider when and how to transition employees from working remotely to return to the workplace, they also should consider contact tracing programs as a tool to identify and assist employees who potentially are exposed to the novel coronavirus (COVID-19). These programs are designed to protect workers, their families, and their communities by slowing or stopping the transmission of the virus.

The ESCC's Responsible Reentry and Return to Workplace Tiger Team has collected contact tracing plans that are being developed and used across the electric power industry. Based on those materials, the team has drafted a set of basic planning considerations that can help organizations develop approaches that fit local conditions. The Tiger Team will continue to work with investor-owned electric companies, public power utilities, and electric cooperatives to identify and share leading practices for contact tracing.

In general, contact tracing includes the following steps:

- **Report:** An employee reports that he/she has symptoms of COVID-19, has tested positive for the virus, or has had contact with a person who has a confirmed COVID-19 case to the organization's human resources (HR) staff or to an appropriate person (e.g., his/her supervisor) who alerts the HR staff.
- **Mitigate:** The employee is sent home and asked to self-quarantine. All affected workplace areas and vehicles are cleaned and disinfected.
- **Investigate:** HR staff interviews the employee to identify his/her close contacts in the workplace and to provide guidance on seeking medical attention.
- **Inform:** HR staff informs the employee's close contacts of their exposure and provides guidance on mitigation steps.
- **Track and Follow-Up:** HR staff conducts follow-up interviews with the employee and his/her close workplace contacts to track symptoms and to indicate when/if he/she can return to the workplace.

Any contact tracing effort should be developed in coordination with organized labor (if applicable), HR professionals, and legal counsel, and should be communicated clearly to the workforce and to other stakeholders. In addition, the process should emphasize and value employee confidentiality and adhere to applicable local, state, and federal privacy laws.

PLANNING CONSIDERATIONS:

- **Starting the Contact Tracing Process:** Contact tracing should begin after an employee tells HR staff or an appropriate person (e.g., his/her supervisor) that he/she has symptoms of COVID-19, has tested positive for the virus, or has had contact with a person who has a confirmed COVID-19 case. The organization should ensure that the employee is sent home immediately and that affected workplace areas and vehicles are cleaned. Furthermore, the supervisor should alert the organization's HR team to begin identifying and tracing the employee's close contacts.
- **Defining "Close Contacts":** The Centers for Disease Control and Prevention (CDC) [defines](#) a close contact as "someone who was within 6 feet of an infected person for at least 15 minutes starting from 48 hours before

illness onset until the time the patient is isolated.” Contacts can include, but are not limited to, family members, co-workers, customers, vendors, or contractors.

- **Engaging with the Potentially Infected Employee and Exposed Contacts:** An organization’s HR staff should interview the employee and then conduct tracing interviews with his/her close contacts. As part of the interview process, organizations should:
 - Develop a standard set of questions and talking points for interviews with the potentially infected employee to identify his/her close contacts; determine when/where the exposure with the contacts occurred; and provide guidance on seeking medical attention.
 - Conduct interviews with the employee and his/her contacts by phone, excluding the employee’s manager(s) since sensitive medical and personal information will be discussed.
 - Maintain confidentiality by not identifying the individual who reported symptoms. Contacts only should be informed that they may have been exposed to an individual who has COVID-19 or who has been in close contact with someone who has COVID-19. They should not be told the identity of the person. Organization also may consider using an authorization form for an employee to sign giving his/her approval to release his/her identity voluntarily.
 - Provide clear guidance on steps a contact should take and indicate when he/she can return to the workplace. The CDC [recommends](#) that contacts stay home and maintain social distancing (at least 6 feet) until 14 days after their last exposure, in case they also become ill. The CDC also recommends that the contacts monitor themselves by checking their temperature twice daily and watching for a cough or shortness of breath.
 - Consider whether to inform close contacts who are not employees, or work with local health authorities to provide that information for their contact tracing efforts.
 - Conduct follow-up interviews to determine whether contacts develop symptoms. If so, the organization should suggest they reach out to their medical providers for further health guidance.
- **Tracking and Follow-Up Protocols:** Organizations should consider using an encrypted database system to track information collected during the contact tracing interviews. Tracked information may include: the date of an employee’s onset of symptoms and/or positive test result; a list of all close contacts; and the date/locations of the contacts’ exposure. Organizations should consider using employee ID numbers in the database, instead of names, to help ensure confidentiality. The database system can facilitate follow-up interviews with infected employees and their contacts. All close contacts should be informed if an employee who reported symptoms receives a negative test result. Contacts who are also employees may return to the workplace after verifying that they are still asymptomatic.
- **Use of Technology:** The Tiger Team is continuing to work with the electric power sector to identify technologies that could facilitate or automate the contact tracing process. One organization indicated that it is using an app-based system to capture data from a variety of IT systems (such as fleet information and badging systems) to reduce the time required in a manual tracing process. The information then is made available to the HR team via a database and dashboard. Meanwhile, the tech industry is developing other tools, such as case management and proximity tracking systems, that primarily are designed for public health organizations. For instance, Apple and Google have partnered on a platform that helps public health organizations develop apps that use Bluetooth technology to automate contact tracing. While only public health authorities will have access to this platform, organizations in the sector eventually may be able to use some of the approaches and tactics to assist in their contact tracing efforts.
- **Engagement with State/Local Governments and External Tracing Programs:** Public health authorities likely will establish contact tracing programs for tracking exposure within communities. Organizations should consider engaging with those health authorities and state/local governments to establish protocols for being notified about potential employee exposure points outside work facilities.