



DEPARTMENT OF THE NAVY

**PUGET SOUND NAVAL SHIPYARD
AND INTERMEDIATE MAINTENANCE FACILITY
1400 FARRAGUT AVENUE STOP 2090
BREMERTON WASHINGTON 98314-2090**

IN REPLY REFER TO:
4200
Ser 440/282
April 4, 2020

From: Chief of the Contracting Office, Puget Sound Naval Shipyard and Intermediate Maintenance Facility (Code 440)

To: Contractors Performing under Contracts Awarded by Puget Sound Naval Shipyard and Intermediate Maintenance Facility

Subj: CORONAVIRUS DISEASE 2019 (COVID-19) ALTERNATE WORKFORCE CONTROLS WHEN SOCIAL DISTANCE PROTOCOLS ARE IMPRACTICAL

Encl: (1) OSHA 3990-03 2020, Guidance on Preparing Workplaces for COVID-19

Encl: (2) COVID-19 Screening and Self Assessment Form

Dear Contractor,

This letter provides guidelines to contractors performing under contracts awarded by Puget Sound Naval Shipyard and Intermediate Facility (PSNS & IMF) to assist in the development and rapid implementation of procedures and work controls for the Coronavirus disease 2019 (COVID-19), when personnel must perform work within six feet of each other while performing work. These guidelines shall apply to all contractors performing work on vessels or facilities within the PSNS & IMF Controlled Industrial Area (CIA) and other Naval Bases in the Pacific Northwest.

PSNS & IMF has adopted the policy of “social distancing” as recommended by the U.S. Department of Health and Human Services' Centers for Disease Control and Prevention (CDC) to minimize the spread of the virus that causes COVID-19. However, some work may require workers to be within six feet of each other, in conflict with the recommended practice.

Recommendations from the Occupational Safety and Health Administration (OSHA), as specified in Enclosure (1), define lower exposure risk work as any work that does not require contact with people known to be or suspected of being infected with COVID-19, nor frequent close contact (within six feet) of others. It is recommended that contractors shall adopt guidelines employing social distancing to the maximum extent possible to keep the majority of the workforce in the lower exposure risk category.

Contractors are also reminded to continue to conduct the mandatory daily screening and self-assessment of employee health and COVID-19 risk factors, Enclosure (2), and encouraging proper hygiene and educating the company's workforce.

Medium exposure risk work includes work requiring frequent or close contact (within six feet) of others who are NOT known or suspected to have COVID-19. The information outlined in this letter will assist contractors in developing procedures and work controls for medium

Subj: ALTERNATE CONTROLS FOR WORK WHEN SOCIAL DISTANCING IS NOT PRACTICAL

exposure risk personnel that are consistent with OSHA recommendations and ensure alignment with the PSNS & IMF workforce, which often interacts with the contractor workforce.

Higher exposure risk categories defined by OSHA include healthcare workers and those who are expected to be working closely with people infected with COVID-19. No personnel at PSNS & IMF are expected to be engaged in higher exposure risk work.

All contractors shall consider the necessity of work that requires two or more employees to be within six feet of each other. The use of multiple employees within six feet of one another must not be based on convenience. If the work can be performed by one employee, or with two or more employees maintaining a six-foot distance from one another, then work should proceed in this manner. Consider the use of reach tools or other distancing techniques, if appropriate. It is also preferred that tasks are to be scheduled to be performed in sequence rather than in tandem or parallel in order to limit personnel working within six feet from each other.

When distance or isolation methods are not practical, appropriate mitigation strategies shall be implemented based on OSHA's hierarchy of controls shown in Enclosure (1). The specific controls being used to protect employees for the task shall be discussed during pre-job briefs.

Engineering Controls

(1) Placing physical barriers between employees is likely to be the most effective engineering control. When feasible, install barriers such as clear plastic cough or sneeze guards between personnel.

(2) Ventilation is a common engineering control for inhalable substances. However, in the case of COVID-19 during medium exposure situations, it is not likely to be effective at capturing sputum when a person coughs or sneezes.

Administrative Controls. Administrative controls shall be applied to all work processes. Typical controls include, but are not limited to:

(1) Review of employee health status. Contractor personnel shall complete the self-assessment screening set forth in Enclosure (2), daily prior to reporting to work. Contractor management shall ensure employees have been cleared to work per the screening questionnaire prior to assigning them work within six feet of other personnel.

(2) The CDC individual risk factors that include but are not limited to increased age, asthma, or pregnancy shall be considered when assigning employees to a task.

(3) Wash hands with soap and water for 20 seconds, which is the preferred method prior to beginning work and immediately after. In the absence of hand wash facilities in the immediate vicinity, use hand sanitizer with a minimum of 60 percent alcohol. Disinfect tools and common use items prior to and immediately following work.

Subj: ALTERNATE CONTROLS FOR WORK WHEN SOCIAL DISTANCING IS NOT PRACTICAL

Note: Use Environmental Protection Agency-listed disinfectants and follow manufacturer's instructions for application and contact time.

- (4) Limit access to the work area to prevent unnecessary exposures.
- (5) Minimize time that employees are within six feet of each other.
- (6) Perform adjacent work in closed spaces on separate shifts.
- (7) Avoid touching nose, mouth, and eyes.

Personal Protective Equipment (PPE). While engineering and administrative controls are considered more effective in minimizing exposure, PPE may also be employed as a mitigation strategy.

(1) Depending on the amount of contact anticipated between employees, the use of disposable gloves, face protection such as goggles or face shield, and a surgical or dust mask shall be required when social distancing cannot be maintained.

(a) Disposable gloves may be useful when hand-washing facilities are not available for frequent use. Frequent changing of disposable gloves can be an alternative to hand washing when those facilities are not available.

(b) Face protection such as goggles, face shields, and surgical or dust masks will act as physical barriers and a reminder to personnel not to inadvertently touch their face.

(2) The use of respiratory protection may be needed for performing a medium exposure risk task, as defined by Enclosure (1). Where it is anticipated that respiratory protection would be required to protect employees from COVID-19, contractors shall follow OSHA guidelines as necessary, as defined by Enclosure (1).

(3) Contractor Management, and Health and Safety program managers shall ensure guidance on the proper donning, doffing, use, and disposal of PPE is provided to their respective workforce.

These principles shall be implemented on a go-forward basis, not to delay mission essential work. The Contracting Officer and/or Contracting Officer's Representative's (COR's) concurrence on applying OSHA's hierarchy of controls is not required.

Implementation of these procedures will begin 8 April. Given the speed at which COVID-19 is spreading worldwide and the abnormal spike in demand for all types of PPE, the government recognizes there may be a short ramp up period to obtain the full suite of PPE to perform

Subj: ALTERNATE CONTROLS FOR WORK WHEN SOCIAL DISTANCING IS NOT PRACTICAL

medium risk work. Contractor's shall make every effort to operate in full compliance with this direction as quickly as possible.

For questions regarding this guidance, please contact the appointed COR or Contracting Officer of the applicable contracts this letter applies to.

D. C. CROW
Chief of the Contracting Officer