

Procedures for Addressing Suspected COVID-19 Exposure or Illness, Returning Employees to Work, and Mitigating Workplace Exposure Risk

Based on Information Extrapolated from CDC Website Guidances on April 12, 2020ⁱ

Workers at Businesses <u>Not</u> on DHS CISA List ⁱⁱ of Critical Infrastructure Workers		Critical Infrastructure Workers on the <u>DHS CISA List</u> (Other than Healthcare Workers)	
Asymptomatic Employee Potentially Exposed to COVID-19		Asymptomatic Employee Potentially Exposed to COVID-19	
Applies to an Employee Who:	<p>(1) is in the same household with, (2) is an intimate partner of, (3) provided care to someone in the household without using recommended infection control precautions, OR (4) has close contact (within 6 feet) for a prolonged period of time (10 minutes or more) with an individual who has confirmed or suspected (symptomatic) COVID-19.</p>	Applies to an Employee Who:	<p>(1) is in the same household with OR (2) has close contact within 6 feet of an individual with confirmed or suspected COVID-19 within the period of time of 48 hours before the individual became symptomatic.</p>
Outside 48-Hour Period	<p>Within 48-Hour Period</p> <p>If the employee's exposure is within the period of time of 48 hours before the individual with whom the employee had contact became symptomatic, follow these procedures:</p>		The employee can continue working and should adhere to the following practices prior to and during the work shift:
If the employee's exposure to the individual is outside of the period of time of 48 hours before the individual with whom the employee had contact became symptomatic, the employee can continue working.	<ol style="list-style-type: none"> Quarantine: Employee should be sent home until 14 days after the last exposure to the individual and should maintain social distance (at least 6 feet) from others at all times. Direct the employee to the CDC website or app for information about self-monitoring, social distancing, and avoiding high-risk people. Recommend That the Employee Seek a Medical Diagnosis. If the employee seeks a medical diagnosis, extend paid sick leave under the Emergency Paid Sick Leave Act (EPSLA), Reason #3. After seeking a medical diagnosis, if the employee is advised by a health care provider to self-quarantine, transition paid sick leave to Reason #2 for up to 80 hours. Complete EPSLA leave request form. Consider Remote Work. If the employee can work remotely, make arrangements for this to occur. In this case, the employee would not qualify for EPSLA. Identify Coworkers Who Had Close Contact With the COVID-Exposed Employee: Consider others at the facility who had <i>close contact</i> with the COVID-exposed employee (within a 6-foot distance) during the 48-hour period since the employee's last exposure to the person with confirmed or suspected COVID-19. Notify Coworkers: Notify coworkers who had <i>close contact</i> with the employee that a coworker with whom they work was possibly exposed to the virus, so they should remain vigilant for any symptoms. Direct them to the CDC website or app for more information. To comply with the Americans with Disabilities Act (ADA) confidentiality provisions, do not refer to the COVID-exposed employee by name. Disinfect and Clean Work Spaces: Follow CDC guidelines for cleaning disinfecting your facility and employee work areas. 		<ol style="list-style-type: none"> Pre-Screen: Take the employee's temperature and assess symptoms prior to the employee starting work and, ideally, before the individual enters the facility. Self-Monitor: As long as the employee does not have a temperature or symptoms, he or she should self-monitor (under the supervision of the employer's occupational health program, if one exists). Wear a Mask: The employee should wear a face mask at all times while in the workplace for 14 days after their last exposure. Employers can issue facemasks or can approve employees' supplied cloth face coverings in the event of a shortage. See CDC guidance pertaining to use of cloth face coverings. Social Distancing: The employee should maintain a distance of 6 feet and practice social distancing as work duties permit in the workplace. Disinfect and Clean Work Spaces: Routinely clean and disinfect all areas, such as offices, bathrooms, common areas, and shared electronic equipment. If the Employee Becomes Sick: If the employee becomes sick during the day, isolate the employee and send him or her home immediately. Follow all steps under "Employee with Symptoms of COVID-19." (below) Return to Work: Follow the appropriate procedures below for returning the employee to work. When possible, obtain a doctor's note to confirm that the employee is released to work.

<p style="text-align: center;">Employee with Symptoms of COVID-19</p> <p style="text-align: center;">Fever, dry cough, shortness of breath, or other COVID-19 symptoms identified by the CDC</p>	
Employee Should Not Be Permitted to Continue Working	
<ol style="list-style-type: none"> 1. Isolate and Send Employee Home: Isolate the employee from others and send the employee home if he or she becomes ill at work. Recommend that the employee seek medical treatment. Direct the employee to the CDC website for information about how to prevent the spread of COVID-19. 2. Close Off Work Area. Close off the area where the employee worked. Open outside doors and windows to increase air circulation in the area. Wait 24 hours before cleaning or disinfecting. If 24 hours is not feasible, wait as long as possible. Follow CDC guidelines for cleaning and disinfecting your facility and employee work areas. 3. Compile Information About People Who Had Contact with the Ill Employee: Obtain information about persons who had <i>contact</i> with the ill employee during the time the employee had symptoms and 2 days prior to symptoms. This can be done by questioning the employee, checking work schedules, or by other methods. 4. Identify Coworkers Who Had Close Contact with the Ill Employee: Consider others at the facility who had <i>close contact</i> with the ill employee (within a 6-foot distance) during the 48-hour period before the employee began to have symptoms to be exposed. 5. Notify Coworkers: Notify coworkers who had close contact with the employee that a coworker with whom they work began to experience symptoms of COVID-19 on XX (date). Direct the coworkers to the CDC website for more information. To comply with the Americans with Disabilities Act (ADA) confidentiality provisions, do not refer to the ill employee by name. 6. Paid Sick Leave: Determine if the employee is qualified for Emergency Paid Sick Leave under the Emergency Paid Sick Leave Act (EPSLA). If so, verbally obtain information from the employee to complete a Sick Leave Request Form. Hold the form for the employee's signature at a later time. Depending on the length of the absence and the employee's condition, consider eligibility for other forms of paid or unpaid leave or for state-mandated or company-sponsored insurance. 7. Return to Work: Follow the appropriate procedures below for returning the employee to work. When possible, obtain a doctor's note to confirm that the employee is released to work. 	
<p style="text-align: center;">Return-To-Work Options for Employee with COVID-19 Who Had Symptoms and Stayed Homeⁱⁱⁱ</p> <p style="text-align: center;">Unless the employee has been advised otherwise by a health care provider or is under a government-mandated quarantine order with different requirements, an employee with COVID-19 who had symptoms and stayed home (home-isolated) can discontinue home isolation and return to work under the following conditions:</p>	
Employee Gets Tested to Confirm He or She is Negative for COVID-19	Employee Does Not Get Tested To Confirm He or She is Negative For COVID-19 ^{iv}
<ol style="list-style-type: none"> 1. Fever is resolved without use of fever-reducing medication, AND 2. Improvement in respiratory symptoms (cough and shortness of breath), AND 3. Two negative final test results in a row, 24 hours apart, with specimens obtained and tested per CDC guidance. 	<ol style="list-style-type: none"> 1. At least 3 full days (72 hours) have passed since resolution of a fever without use of fever-reducing medication, AND 2. Improvement in respiratory symptoms (cough and shortness of breath), AND 3. At least 7 days have passed since symptoms first appeared.
When possible, obtain a doctor's note to confirm that the employee is released to work.	
Employees with laboratory-confirmed COVID-19 who have not had any symptoms may discontinue isolation when at least 7 days have passed since the date of their first positive COVID-19 diagnostic test and with no subsequent illness provided they remain asymptomatic. For 3 days following discontinuation of isolation, these persons should continue to limit contact (stay 6 feet away from others) and limit potential of dispersal of respiratory secretions by wearing a covering for their nose and mouth whenever they are in settings where others are present.	

Employer Safety and Health Practices to Mitigate Employee Exposure Risk
Per CDC and OSHA Guidelines

- 1. Employee Communication:** Employees should be instructed to stay home if they are sick, except to get medical care. They should also be required to notify their supervisor or HR if they have a sick family member at home with COVID-19 or if they believe they may have been exposed to COVID-19. Employers should then follow the CDC guidance for workers who may have had exposure to a person with suspected or confirmed COVID-19 (outlined above).
- 2. OSHA Guidance:** We recommend that employers obtain and read the **Occupational Safety and Health Administration's (OSHA's) [Guidance on Preparing Workplaces for COVID-19](#)** that outlines engineering controls, administrative controls, safe work practices, and PPE requirements. Determine the occupational exposure risk level for all positions at your organization and follow the procedures in the OSHA guidance for mitigating risk. This is critical for employers to establish compliance with OSHA's General Duty Clause, which requires employers to provide employees with a workplace free from recognized hazards likely to cause death or serious physical harm.
- 3. Retail Employers:** Obtain the OSHA Alert [COVID-19 Guidance for Retail Workers](#) and adopt the tips that are listed for reducing employees' risk of exposure to COVID-19.
- 4. General Guidance for Businesses:** Obtain and follow the CDC's [Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\)](#).
- 5. Preventative Cleaning:** To prevent the spread of germs, obtain the CDC's guidance, [Cleaning and Disinfecting Your Facility](#) and follow the surface-specific tips for routine cleaning and disinfecting the workplace. Use [EPA-registered household disinfectants](#) for use against COVID-19, as noted.
- 6. Sick Employees in the Workplace:** If a sick employee is suspected or confirmed to have COVID-19, follow the [CDC's specific steps](#) for cleaning and disinfecting the building or facility after an ill employee has been there.

ⁱ Information on this chart is not intended to be all-inclusive; it is a summary of select CDC information available from www.cdc.gov/coronavirus. Information and guidance on the CDC website is subject to change at any time. Given the dynamic nature of the COVID-19 global pandemic, employers should check the CDC website for the most updated information prior to making employment decisions. Information on this chart is not intended to be legal, medical, or financial advice; nor is it intended to provide recommendations for any specific employment situation.

ⁱⁱ The Cybersecurity and Infrastructure Security Agency (CISA) of the Department of Homeland Security (DHS) has identified 16 infrastructure sectors that are essential for the response to COVID-19. These sectors each have several essential critical workers that CISA believes are necessary for public health and safety, as well as community well-being. The list was developed to help state and local governments and the private sector ensure that employees who are essential to operations of critical infrastructure can continue working with as little interruption as possible. The guidance is intended to offer an initial baseline for government and industry to use when identifying key groups of employees who may require accommodation to ensure that infrastructure function is not degraded during the COVID-19 response. Different jurisdictions may come to different conclusions as to where essential worker accommodation is warranted.

ⁱⁱⁱ CDC testing guidelines are based on limited information and are subject to change at any time as more information becomes available.

^{iv} 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 testing.