

## Employee COVID Chart (v.9)

### Procedures for Addressing Employee COVID-19 Scenarios, Ending Home Isolation, and Mitigating Workplace Exposure Risk

*Based on Information for Nonhealthcare Workers Extrapolated from CDC Website Guidances on August 6, 2021<sup>1</sup>*

#### New Developments and What You Need to Know About This Version (v.9) of the Chart:

1. On July 27, 2021, the [CDC quarantine guidance](#) for fully vaccinated individuals was updated. Consistent with the agency's March 12, 2021, guidance, fully vaccinated individuals who have been in *close contact* with a COVID+ person still do not need to quarantine if they show no symptoms. However, in an effort to reduce the spread of the Delta variant, the CDC now recommends that such individuals with known exposure to someone who has suspected or confirmed COVID-19 be tested 3-5 days after exposure and wear a mask in public indoor settings for 14 days OR until they receive a negative test. They should also monitor for symptoms of COVID-19 for 14 days following exposure and isolate if they develop symptoms.

In light of the CDC's additional recommendations for fully vaccinated individuals, we have added a new table to the chart that addresses fully vaccinated, asymptomatic employees who are exposed to COVID-19. The new chart is on [page 3](#) and is devoted entirely to this group. It explains procedures to follow when fully vaccinated employees are exposed to COVID-19 and remain asymptomatic, including instructions for what we refer to as an "observation period" of 3 to 14 days (as per the CDC's recommendations explained above). The new chart replaces the former critical infrastructure worker chart, which is no longer relevant for most businesses. [Page 2](#) still includes a reminder about the quarantine exception for fully vaccinated individuals and those who tested positive for COVID-19 within the past 3 months. (*Note: In order to forgo a quarantine and permit the observation period for a fully vaccinated employee who is exposed to COVID-19, we recommend verifying the vaccination status of the individual. Clients using our HR consultation service can contact us to request our Employee Vaccination Status Certification.*)

2. Although the definition of a *close contact* for the purpose of determining exposure to COVID-19 has not changed, the CDC no longer provides all of the examples that we previously cited in the yellow rows on [pages 2 and 3](#). For this reason, these examples have been removed. Essentially, any employee who has been within 6 feet of a COVID+ person (someone who has laboratory confirmed COVID-19 or a clinically compatible illness) for a cumulative total of 15 minutes or more over a 24-hour period starting 2 days prior to specimen collection or the start of symptoms until the COVID+ person meets the criteria for ending home isolation is considered exposed. Such employees, if unvaccinated, should be required to quarantine, following the procedures on [page 2](#). See [page 3](#) for procedures to follow when a fully vaccinated employee is exposed to a COVID+ person.
3. Under the [American Rescue Plan Act of 2021](#) (ARPA), effective April 1, 2021, employers with fewer than 500 employees can continue to receive tax credits for voluntarily providing emergency paid sick leave and/or emergency family and medical leave if they comply with the Emergency Paid Sick Leave Act (EPSLA) and Emergency Family and Medical Leave Expansion Act (EFMLEA), in addition to new eligibility reasons for these leaves under the ARPA. Among others, these requirements include resetting sick leave to 80 hours for use through September 30, 2021. [Pages 2, 3, 4, and 5](#) reflect the ongoing voluntary nature of these leaves.
4. There continue to be [three quarantine options](#) of differing duration for unvaccinated employees (including those who are not yet fully vaccinated) and those whose vaccination status is unknown when such individuals have been exposed to a COVID+ person. The CDC continues to recommend the full 14-day quarantine option for individuals who had [close contact](#) with a COVID+ person. Requiring a COVID-exposed employee to quarantine for 14 days reduces the potential for transmission to the greatest degree (0%-3%) and thus reduces workplace risks to the greatest extent. Employers should evaluate the quarantine options and select the option that is suitable for their risk tolerance, taking into consideration factors such as the work environment, customer and employee characteristics (age and health), extent of contact with and proximity to others (coworkers, customers, and the general public), vaccination status of the workforce, indoor/outdoor setting, size of the workspace, and volume of people in the workspace. [Page 2](#) outlines the options for quarantines.
5. The CDC continues NOT to recommend a [test-based strategy](#) to end home isolation for individuals who contract COVID-19, unless the person is severely immunocompromised. [Page 6](#) reflects this guidance. Employers should treat vaccinated and unvaccinated employees the same in terms of ending home isolation after contracting COVID-19 and should permit employees to decide (often in conjunction with a health care provider) if they will follow the test-based or symptom-based strategy for ending home isolation.

Remember, a person is considered fully vaccinated for COVID-19 2 or more weeks after they received the second dose in a two-dose series of the vaccine OR 2 or more weeks after they receive a single-dose vaccine.

LOTS of important changes in this version due to the Delta variant.

**Unvaccinated Employees: Quarantine Options and Procedures for Asymptomatic Employees Who Are Exposed to a COVID+ Individual (Includes Those Whose Vaccination Status is Unknown)**

<b>Applies to an Employee Who:</b>	Had <i>close contact</i> (within 6 feet for a cumulative total of 15 minutes or more over a 24-hour period) with a <b>symptomatic</b> COVID+ person during the period of time beginning 2 days before <u>symptom onset</u> until the last contact with the COVID+ person <u>OR</u> with an <b>asymptomatic</b> person any time starting 2 days before the date of <u>specimen collection</u> until the last contact with the COVID+ person. (NOTE: A COVID+ person includes a person with laboratory-confirmed COVID-19 or a clinically compatible illness.)	
<b>Does Not Apply to:</b>	Employees who have tested positive for COVID-19 within the past 3 months, have recovered, and remain without COVID-19 symptoms <b>AND</b> employees who have been <b>fully vaccinated</b> and show no symptoms. See <a href="#">page 3</a> for more guidance pertaining to fully vaccinated employees who are exposed to COVID-19.	
<b>Quarantine Options and Estimated Post-Quarantine Transmission Risks:</b>	<b>Quarantine Options for Nonhealthcare Employees Exposed to a COVID+ Person</b>	<b>Estimated Transmission Risk</b>
	<p><b>Preferred Option:</b> The COVID-exposed employee is sent home to quarantine for <b>14 days</b> after the last exposure to the COVID+ person and can return to work after 14 days without testing <u>IF</u> no symptoms have been reported during daily monitoring. (<i>Note: A negative test does not substitute for the 14-day quarantine; the entire 14-day quarantine period must be completed in order to reduce the transmission risk to 0%-3%.</i>)</p> <p><b>Alternative Option 1:</b> The COVID-exposed employee can be sent home to quarantine for <b>10 days</b> after the last exposure to the COVID+ person and may return to work <u>after 10 days without testing</u> <u>IF</u> no symptoms have been reported during daily monitoring. The employee must continue to monitor for symptoms through day 14 and immediately isolate if symptoms develop. The employee should maintain a 6-foot distance from others, wear a mask, wash his or her hands often, avoid crowds, and <a href="#">take other steps to prevent the spread of COVID-19</a>.</p> <p><b>Alternative Option 2:</b> When diagnostic testing resources are sufficient and available, the COVID-exposed employee can be sent home to quarantine <b>for 7 days</b> after the last exposure to the COVID+ person and may return to work after 7 days <u>IF</u> no symptoms have been reported during daily monitoring <b>AND</b> the employee gets tested within 48 hours prior to the time the quarantine ends (that is, no sooner than day 5) and tests negative. The employee must continue to monitor for symptoms through day 14 and immediately isolate if symptoms develop. The employee should maintain a 6-foot distance from others, wear a mask, wash his or her hands often, avoid crowds, and <a href="#">take other steps to prevent the spread of COVID-19</a>.</p>	<b>14 Days, With or Without a Negative Test:</b> 0%-3%
		<b>10 Days, No Testing:</b> 1%-10%
		<b>7 Days + Negative Test:</b> 5%-12%
<b>Workplace Procedures to Follow</b>		
<ol style="list-style-type: none"> <li>1. <b>Require the exposed unvaccinated employee to quarantine using one of the above options and recommend that he or she seek a medical diagnosis.</b></li> <li>2. <b>Determine if the employee qualifies for paid leave under company policy or federal, state, or local regulations.</b> Check your company policies and state and county COVID-related paid leave requirements. If your company has elected to voluntarily provide emergency paid sick and/or family leave under the provisions of the <b>American Rescue Plan Act of 2021</b> (ARPA), verify that the employee is eligible and extend the appropriate leave.</li> <li>3. <b>Consider remote work.</b> If the asymptomatic employee can work remotely while in quarantine, make arrangements for this to occur. If the employee is able to work, he or she would not be eligible for paid leave.</li> <li>4. <b>No need for contact tracing.</b> Employees who had <i>close contact</i> with the quarantined employee <u>do not need to quarantine</u> themselves because they were not directly exposed to the COVID+ person.</li> <li>5. <b>If the quarantined employee tests positive during the quarantine:</b> The employee must begin a home isolation period and may not return to work until fulfilling the applicable return-to-work option outlined on <a href="#">page 6</a>. In many cases, the isolation period will extend past the original 7-, 10-, or 14-day quarantine period. There is no need to notify coworkers that an employee <i>in quarantine</i> tested positive or developed COVID-19 symptoms <u>unless</u> the quarantined employee was tested prior to the day the quarantine began or within 2 days after the quarantine started. In this case, you would identify coworkers who had <i>close contact</i> with the employee based on the CDC criteria in the yellow-colored row above. Such employees should be required to quarantine (following the quarantine option that your company adopted) unless they are fully vaccinated or tested positive for COVID-19 in the past 3 months, are fully recovered, and remain symptom-free.</li> <li>6. <b>Disinfect and clean work spaces:</b> Follow CDC guidelines for <a href="#">cleaning and disinfecting</a> your facility and employee work areas.</li> </ol>		

## Fully Vaccinated Employees: Procedures for Fully Vaccinated Employees Who Are Exposed to a COVID+ Individual and Remain Asymptomatic

<b>Applies to an Employee Who:</b>	Had <i>close contact</i> (within 6 feet for a cumulative total of 15 minutes or more over a 24-hour period) with a <b>symptomatic</b> COVID+ person during the period of time beginning 2 days before <u>symptom onset</u> until the last contact with the COVID+ person <u>OR</u> with an <b>asymptomatic</b> person any time starting 2 days before the date of <u>specimen collection</u> until the last contact with the COVID+ person. (NOTE: A COVID+ person includes a person with laboratory-confirmed COVID-19 or a clinically compatible illness.)
<b>Observation Period Conditions for Fully Vaccinated Employees</b>	<p><b>Fully vaccinated</b> workers who have a known exposure to someone with suspected or confirmed COVID-19 AND who show no symptoms <u>do not need to quarantine</u>; <b>HOWEVER</b>, employers should follow these procedures for such individuals:</p> <ol style="list-style-type: none"><li>1. Verify that the employee is fully vaccinated if you have not already done so. If the employee is unvaccinated or not yet fully vaccinated, follow the procedures on <b>page 2</b>.</li><li>2. Notify the employee that the CDC suggests testing 3-5 days after exposure (not prior to this time period).</li><li>3. Require the employee to wear a mask in public indoor settings for 14 days (e.g., in the workplace, unless the employee works alone or can socially distance from others) <u>OR</u> until he or she receives a negative test result (if the employee elects to get tested).</li><li>4. If the employee tests 3-5 days after exposure and reports a negative result, require the employee to provide proof of the test result in order to work without a mask (if your company permits this for fully vaccinated employees). Verify that the sample was tested a minimum of 3 days after exposure (not sooner).</li><li>5. Notify the employee that the CDC recommends that he or she continue to self-monitor for symptoms for 14 days following exposure. Employers can also monitor the employee for symptoms of COVID-19 with or without use of a health screening questionnaire. (<i>Clients using our HR consultation service can contact our firm for a sample health screening questionnaire.</i>) Require the employee to immediately report to a designated person if he or she develops one or more symptoms of COVID-19. Should this occur, require the employee to isolate and conduct workplace contact tracing (see below for more details). Follow the procedures for ending home isolation on <b>page 6</b>.</li></ol>
<b>Workplace Procedures to Follow</b>	
<ol style="list-style-type: none"><li>1. <b>Follow the procedures above pertaining to the observation period for fully vaccinated employees.</b></li><li>2. <b>No need for contact tracing.</b> Employees who had <i>close contact</i> with the fully vaccinated coworker who was exposed to COVID-19 <u>do not need to quarantine</u> themselves because they were not directly exposed to the COVID+ person.</li><li>3. <b>If the fully vaccinated employee develops symptoms, require him or her to isolate and seek medical care. Then, identify and notify exposed coworkers.</b> Identify coworkers who were exposed to the fully vaccinated COVID+ employee who developed symptoms. This includes coworkers who had <i>close contact</i> with the fully-vaccinated COVID+ employee during the window of time beginning 2 days before symptom onset and ending when the fully vaccinated COVID+ employee left the workplace. Such employees should be required to quarantine (following the quarantine option on <b>page 2</b> that your company adopted) unless they are fully vaccinated or tested positive for COVID-19 in the past 3 months, are fully recovered, and remain symptom-free. Fully vaccinated employees who are identified as <i>close contacts</i> of the fully vaccinated COVID+ employee should be required to follow the conditions under the <u>Observation Period</u> section above. Direct exposed employees to the CDC website for more information. To comply with <b>Americans with Disabilities Act (ADA)</b> confidentiality provisions, do not name the COVID+ fully vaccinated employee.</li><li>4. <b>Determine if employees who must quarantine or isolate qualify for paid leave under company policy or federal, state, or local regulations.</b> Check your company policies and state and county COVID-related paid leave requirements. If your company has elected to voluntarily provide emergency paid sick and/or family leave under the provisions of the <b>American Rescue Plan Act of 2021 (ARPA)</b>, verify that the employee is eligible and extend the appropriate leave.</li><li>5. <b>If an unvaccinated quarantined employee tests positive during the quarantine, follow the procedures in the blue section of page 2, paragraph 5.</b></li><li>6. <b>Disinfect and clean work spaces:</b> Follow CDC guidelines for <u>cleaning and disinfecting</u> your facility and employee work areas.</li></ol>	

**Employee Who Reports Having Symptoms of COVID-19**

CDC Symptoms as of 8/06/21: **Fever (100.4° F or higher) or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, diarrhea**

List does not include all possible symptoms. CDC will continue to update this list as they learn more about COVID-19.

**Fully Vaccinated and Unvaccinated Employees With Symptoms of COVID-19 Should Not Be Permitted to Continue Working**

1. **Isolate and send the employee home.** Isolate the employee from others and send the employee home if he or she becomes ill at work. Direct the employee to the CDC website for information about [how to prevent the spread of COVID-19](#), in the event the employee has COVID-19.
2. **Recommend that the employee seek a medical diagnosis and/or a COVID-19 test.** Do not permit the employee to work while awaiting test results or confirmation of their condition from the healthcare provider.
  - a. If the employee **elects not to get tested or seek a medical diagnosis**, because the employee has one or more symptoms of COVID-19, treat the employee as "suspected COVID-19" and follow the CDC guidelines for ending home isolation for symptomatic individuals, which are outlined on [page 6](#).
  - b. If the employee **elects to get tested and tests negative** OR if the employee **seeks a medical diagnosis** and the healthcare provider confirms that the employee **does not have COVID-19**, the employee can return to work when he or she has recovered. Require the employee to submit the negative test result or the healthcare provider's note confirming that the employee does not have COVID-19 and, if applicable, is released to work.
  - c. If the employee **elects to get tested and tests positive** OR is **diagnosed with COVID-19** by a healthcare provider, the employee should not be permitted to return to work until he or she completes the conditions for ending home isolation for symptomatic individuals, which are outlined on [page 6](#).
3. **Determine if the employee qualifies for paid leave under company policy or federal, state, or local regulations.** Check your company policies and state and county COVID-related paid leave requirements. If your company elected to voluntarily provide emergency paid sick and/or family leave under the provisions of the **American Rescue Plan Act (ARPA)**, verify that the employee is eligible and extend the appropriate leave.
4. **Identify, notify, and quarantine unvaccinated coworkers who were close contacts of the COVID+ employee.** If the symptomatic employee tests positive for COVID-19, is suspected to have COVID-19, or receives a confirmed COVID+ diagnosis by a health care provider, follow any state or local executive orders that require employers to notify some or all employees. If no such order exists, identify unvaccinated coworkers who had *close contact* with the COVID+ employee (per the CDC definition of *close contact* in the yellow-colored rows on [pages 2 and 3](#)) during the period of time beginning 2 days before symptom onset until the last day worked with the employee and require these employees to quarantine, using the quarantine option that your company adopted. Direct employees who need to quarantine to the CDC website for more information. To comply with **Americans with Disabilities Act (ADA)** confidentiality provisions, do not name the COVID+ employee.

**NOTE:** If you use the quarantine option with the lowest risk of post-quarantine transmission (the 14-day quarantine) and you want to maintain this low level of risk, do not forego the 14 days in lieu of a negative test. If you use the 7- or 10-day quarantine, the employee may not return to work until the CDC conditions for the particular quarantine have been satisfied (see [page 2](#)).

5. **Identify and notify fully vaccinated coworkers who were close contacts of the COVID+ employee and coworkers who had COVID-19 in the past 3 months who were close contacts of the COVID+ employee.** Employees who have been **fully vaccinated** and show no symptoms AND employees who have had COVID-19 within the past 3 months, have recovered, and remain without COVID-19 symptoms do not need to quarantine. Fully vaccinated employees who are identified as *close contacts* of the COVID+ employee should be required to follow the conditions under the Observation Period section of the table on [page 3](#). To comply with **ADA** confidentiality provisions, do not name the COVID+ employee.
6. **If you cannot identify close contacts.** If you are uncertain about who may have been exposed to the COVID+ employee, you can notify some or all employees that someone in the building (or in their department or work area, if you limit the group) tested positive for COVID-19 and, while you have no information that they were exposed to the individual, you are notifying them so they are aware. In this situation, because you are unable to identify potentially exposed workers and are providing a broad, general notification that someone in the building/work area/department tested positive for COVID-19, unvaccinated employees may have concerns about their potential exposure. Be prepared for such employees to request time off to test or quarantine, since they don't know if they were exposed or not.
7. **If no employees were exposed to the COVID+ employee.** If no employees were exposed to the COVID+ employee (based on CDC exposure criteria), no further action is necessary.
8. **Disinfect and clean the workspace.** Follow CDC guidelines for [cleaning and disinfecting](#) your facility and employee work areas.

### **Asymptomatic Employee Who Tests Positive for COVID-19**

- 1. Isolate and send the employee home.** Isolate the employee from others and send the employee home if he or she receives notification of a positive test result at work. Direct the employee to the CDC website for information about how to [prevent the spread](#) of COVID-19. Do not permit the employee to return to work until meeting the CDC guidelines for ending home isolation for asymptomatic employees, which are outlined on [page 6](#).
- 2. Determine if the employee qualifies for paid leave under company policy or federal, state, or local regulations.** Check your company policies and state and county COVID-related paid leave requirements. If your company elected to voluntarily provide emergency paid sick and/or family leave under the provisions of the **American Rescue Plan Act of 2021** (ARPA), verify that the employee is eligible and extend the appropriate leave. Leaves under the ARPA run from April 1, 2021, through September 30, 2021.
- 3. Identify, notify, and quarantine unvaccinated coworkers who were close contacts of the COVID+ employee.** Follow any state or local executive orders that require employers to notify some or all employees. If no such order exists, identify unvaccinated coworkers who had *close contact* with the COVID+ employee (per the CDC definition of *close contact* in the yellow-colored rows on [pages 2 and 3](#)) during the period of time beginning 2 days before symptom onset until the last day worked with the employee and require these employees to quarantine, using the quarantine option that your company adopted. Direct employees who need to quarantine to the CDC website for more information. To comply with **Americans with Disabilities Act (ADA)** confidentiality provisions, do not name the COVID+ employee.  
**NOTE:** If you use the quarantine option with the lowest risk of post-quarantine transmission (the 14-day quarantine) and you want to maintain this low level of risk, do not forego the 14 days in lieu of a negative test. If you use the 7- or 10-day quarantine, the employee may not return to work until the CDC conditions for the particular quarantine have been satisfied (see [page 2](#)).
- 4. Identify and notify fully vaccinated coworkers who were close contacts of the COVID+ employee and coworkers who had COVID-19 in the past 3 months who were close contacts of the COVID+ employee.** Employees who have been **fully vaccinated** and show no symptoms AND employees who have had COVID-19 within the past 3 months, have recovered, and remain without COVID-19 symptoms do not need to quarantine. Fully vaccinated employees who are identified as *close contacts* of the COVID+ employee should be required to follow the conditions under the Observation Period section of the table on [page 3](#). To comply with **ADA** confidentiality provisions, do not name the COVID+ employee.
- 5. If you cannot identify close contacts.** If you are uncertain about who may have been exposed to the COVID+ employee, you can notify some or all employees that someone in the building (or in their department or work area, if you limit the group) tested positive for COVID-19 and, while you have no information that they were exposed to the individual, you are notifying them so they are aware. In this situation, because you are unable to identify potentially exposed workers and are providing a broad, general notification that someone in the building/work area/department tested positive for COVID-19, unvaccinated employees may have concerns about their potential exposure. Be prepared for such employees to request time off to test or quarantine, since they don't know if they were exposed or not.
- 6. If no employees were exposed to the COVID+ employee.** If no employees were exposed to the COVID+ employee (based on CDC exposure criteria), no further action is necessary.
- 7. Consider remote work.** If the asymptomatic employee can work remotely while in isolation, make arrangements for this to occur. If the employee is able to work, he or she would not be eligible for paid leave.
- 8. Disinfect and clean the work space.** Follow CDC guidelines for [cleaning and disinfecting](#) your facility and employee work areas.

## Return-to-Work Requirements (Ending Home Isolation) for **Symptomatic Fully Vaccinated and Unvaccinated Employees:**

<b>Ending Home Isolation for Nonhealthcare Employee with COVID-19 Who Had Symptoms and Stayed Home</b> Unless the employee has been advised otherwise by a healthcare provider or is under a government-mandated quarantine order with different requirements, an employee with COVID-19 who <b>had symptoms</b> and stayed home (home-isolated) can discontinue <a href="#">home isolation</a> and return to work under the following conditions:	
<b>Employee Gets Tested to Confirm He or She Is Negative for COVID-19</b> <u>Test-Based Strategy: Only Recommended by the CDC for Severely Immunocompromised Adults</u>	<b>Employee Does Not Get Tested to Confirm He or She Is Negative for COVID-19</b> <u>Symptom-Based Strategy</u>
1. Fever is resolved without use of fever-reducing medication, <b>AND</b> 2. Symptoms have improved, <b>AND</b> 3. Two negative tests in a row, at least <b>24 hours</b> apart (using FDA-approved tests).	1. <u>At least 24 hours</u> have passed since last fever without the use of fever-reducing medication, <b>AND</b> 2. Symptoms have improved [NOTE: Loss of taste and smell may persist for weeks or months and need not delay the end of isolation], <b>AND</b> 3. <u>At least 10 days</u> have passed since symptoms first appeared. [NOTE: For patients with severe illness, the duration of isolation for up to 20 days after symptom onset may be warranted.]
<b>When possible, require <b>symptomatic</b> employees who tested positive to be cleared by a healthcare provider before returning to work.</b>	

## Return-to-Work Requirements (Ending Home Isolation) for **Asymptomatic Fully Vaccinated and Unvaccinated Employees:**

<b>Ending Home Isolation for Nonhealthcare Employee with Laboratory-Confirmed COVID-19 Who Was Asymptomatic and Stayed Home</b> Unless the employee has been advised otherwise by a healthcare provider or is under a government-mandated quarantine order with different requirements, an employee with laboratory-confirmed COVID-19 who was <b>asymptomatic</b> and stayed home (home-isolated) can discontinue <a href="#">home isolation</a> and return to work under the following conditions:	
<b>Employee Gets Tested to Confirm He or She Is Negative for COVID-19</b> <u>Test-Based Strategy: Only Recommended by the CDC for Severely Immunocompromised Adults</u>	<b>Employee Does Not Get Tested to Confirm He or She Is Negative for COVID-19</b> <u>Time-Based Strategy</u>
Two negative tests in a row, at least <b>24 hours</b> apart (using FDA-approved tests). [NOTE: Because of the absence of symptoms, it is not possible to gauge where these individuals are in the course of their illness when they get tested.]	<u>At least 10 days</u> have passed since the date of the employee's first positive COVID-19 diagnostic test <b>AND</b> he or she has continued to have no symptoms since the test. If the employee developed symptoms, then the symptom-based or test-based strategy noted above should be used. [NOTE: Because symptoms cannot be used to gauge where these individuals are in the course of their illness, it is possible that the duration of viral shedding could be longer or shorter than 10 days after the individual's first positive test.]
<b>When possible, require <b>asymptomatic</b> employees who tested positive to be cleared by a healthcare provider before returning to work.</b>	

**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, and should be required to notify their supervisor or HR if they have been exposed to COVID-19 (based on CDC guidelines). Employers should then follow the CDC guidance for workers who had *close contact* with a COVID+ person.
- 2. COVID-19 Vaccinations:** As of August 5, 2021, there is no national COVID-19 vaccine mandate for private employers. Private employers can require employees to receive a COVID-19 vaccination or they can recommend it. As of July 27, 2021, the CDC recommends that all individuals—unvaccinated and fully vaccinated—who are in an area of substantial or high transmission wear a mask indoors in public areas. Also effective July 27, 2021, the CDC issued additional guidance for **fully vaccinated individuals** who have been in *close contact* with a COVID+ person. Refer to **pages 1 and 3** of this chart for details.
- 3. Update Health and Safety Protocols:** As health and safety protocols evolve, employers should revise written health and safety policies and plans, train employees on the new protocols, and require employees to sign an acknowledgement and agreement to abide by them. Safety and health protocols are unique to each business and should consider requirements, standards, and recommendations from a variety of sources, including but not limited to the CDC, OSHA, state and local executive orders, state departments of health (if applicable for the business), and state licensing agencies. Among other protocols, include requirements for masks, social distancing, staying home when ill, routine and enhanced cleaning and disinfection practices, hand-washing, reporting illness and potential exposure to COVID-19, and changes to routine meetings and gatherings. Consider obtaining employees' vaccination status in order to effectively manage health and safety requirements and follow CDC quarantine guidelines.
- 4. Post Notices:** All employers should post the [CDC's COVID-19 posters](#) or similar posters available from their state department of health (or similar resources) to help reinforce safety and health practices and protocols.
- 5. Daily Health Screens:** Depending on your location and industry, health screens may be required or may be part of your COVID-19 prevention protocol. Health screens typically include questioning workers about COVID-19 symptoms prior to the time they enter a facility or office, ride in a company vehicle with other workers, or begin work on customer property. Questions should be worded carefully to ensure that they are not overbroad and are based on current symptoms of COVID-19 and risks of transmission. *[Clients using our HR consultation service can contact our firm for sample health screening forms.]* If temperature checks are included, require employees to sign a notification form with a disclaimer, follow the [CDC guidelines for conducting temperature checks](#), and implement practices to maintain the confidentiality of results.
- 6. Occupational Safety and Health Administration (OSHA) Guidances:** There are several COVID-related OSHA guidances that employers should obtain, read, and follow, including:
  - [Guidance on Preparing Workplaces for COVID-19](#) (March 2020): This guidance outlines engineering controls, administrative controls, safe work practices, and PPE requirements. Using this guidance, employers should determine the occupational exposure risk level for all positions and follow the procedures for mitigating risk.
  - [Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace](#) (UPDATED June 10, 2021): This guidance is for nonhealthcare employers and contains recommendations for implementing a COVID-19 Prevention Program, as well as information about mandatory safety and health standards, such as OSHA's [recordkeeping requirements](#) during the COVID-19 pandemic. OSHA guidance specific to the healthcare industry can be found [HERE](#). Additional industry-specific OSHA guidance can be found [HERE](#).
  - [OSHA Direction](#) (UPDATED July 7, 2021): This document describes policies and procedures for implementing a **National Emphasis Program** that targets certain "high-hazard" industries for COVID-19 workplace investigations. Among the targeted industries are most healthcare entities, grocery stores, full-service restaurants, and limited-service restaurants. The list of "**Secondary Target Industries**" that was included in the original Direction issued on March 12, 2021, has been removed from the updated version. Employers in industries identified as high-hazard by OSHA should ensure that they are diligently complying with OSHA guidelines and requirements, including OSHA's General Duty Clause that requires employers to provide a work environment that is free from recognized hazards that cause or are likely to cause death or serious physical harm.
  - [OSHA Emergency Temporary Standard \(ETS\) for Healthcare](#) (June 21, 2021): This document sets forth workplace requirements to control exposure to SARS-CoV-2 in healthcare settings. Covered employers must follow all requirements in the ETS.
- 7. Preventative and Responsive 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. If a sick employee is suspected of having 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. Once the area where the sick employee worked has been appropriately disinfected, it can be opened for use.

<sup>1</sup> Information on this chart is not intended to be all-inclusive; it is a summary of select CDC and OSHA information available from [www.cdc.gov/coronavirus](http://www.cdc.gov/coronavirus) and <https://www.osha.gov/coronavirus>. Information and guidance on the CDC and OSHA websites is subject to change at any time. Given the dynamic nature of the COVID-19 global pandemic, employers should check the CDC and OSHA websites 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.**