

CHECKLIST: What Do I Do if an Employee Tests Positive for COVID-19?

A four-step plan of action when this occurs

STEP 1: Isolate/Quarantine Confirmed Employees

The infected employee should remain at home until released by a physician or public health official. Remember that if a medical note releasing the employee is not available, generally the employee should remain out of work for fourteen (14) days from the date tested positive and symptoms were exhibited. Two important points related to the positive test employee:

Viral Test vs. Antibody Test Note: There is a difference between testing positive for the viral test (which identifies when someone has an active case of COVID-19) and when someone tests positive for the antibody test. The antibody test is identifying people who have previously had COVID-19 and were asymptomatic during the "active" period of their infection. An employee who tests positive for the antibody test and is not symptomatic is not treated as someone who is currently positive for the viral test.

Emergency Paid Leave Considerations. Remember that the employee may be eligible for Emergency Paid Leave benefits under FFCRA, replacing 100% of their income for 10 working days (80 hours) at a maximum of \$511 per day – and that amount is deductible for the employer. But if the employer has chosen to be exempt from this benefit (mainly medical providers and emergency responders), they cannot replace the wages for this employee.

STEP 2: Address And Isolate Employees Working Near An Infected Co-Worker

When engaging in contact tracing, conduct a **6-15-48** review as recommended by the CDC. You should ask infected employees to identify all individuals who worked in close proximity (within <u>six feet</u>) for a prolonged period of time (<u>15 minutes</u> of close exposure) with them within the <u>48-hour</u> period before the onset of symptoms until the infected employee is cleared to discontinue self-isolation.

Once identified, send home all employees who worked closely with the infected employee for 14 days after last exposure under CDC Guidance to ensure the infection does not spread. While quarantined, those employees should self-monitor for symptoms (check temperature twice a day, watch for fever, cough, or shortness of breath), avoid contact with high-risk individuals, and follow CDC guidance if symptoms develop.

STEP 3: Clean And Disinfect Your Workplace

After a confirmed COVID-19 case, follow the <u>CDC guidelines for cleaning and disinfecting the</u> <u>workplace</u>. Your cleaning staff or a third-party sanitation contractor should clean and disinfect all areas (e.g., offices, bathrooms, and common areas) used by the ill person, focusing especially on frequently touched surfaces.

STEP 4: Notify Your Employees

Following a confirmed COVID-19 case, and as recommended by the CDC, notify all employees who work in the location or area where the employee works of the situation. (We have a sample notice if you need one – just let me know that you need a version and we'll send it to you). Remember you should never reveal any confidential medical information such as the name of the employee, unless the employee has signed an authorization to disclose their diagnosis. Inform employees of the actions you have taken, including requiring employees who worked closely to the infected worker to go home. Let employees know about your sanitizing and cleaning efforts and remind them to seek medical attention if they exhibit symptoms. The failure to notify employees at your location of a confirmed case may be a violation of OSHA's general duty clause, which requires all employers to provide employees with a safe work environment.

Maintaining a Safe Working Environment

Here's a good summary of the CDC and OSHA recommendations for worksites to prevent the further spread of COVID-19:

- Require employees to practice social distancing at work (staying at least six feet apart, limiting
 the number of occupants in offices, bathrooms and/or elevators, requiring office doors to
 remain closed when occupied, restricting occupancy and spacing of breakrooms or common
 work areas such as conference rooms or copiers)
- Staggered arrival and departure times and/or work hours to limit exposure
- Closing certain stalls/urinals in the restroom to create adequate distance between individuals.
- Limit one person to a vehicle, if possible.
- Prohibit sharing of office equipment such as headsets, refrigerators, microwaves, computers, tools, etc. without after-use cleaning.
- Prop open doors to reduce touching of handles; provide no-touch trash cans, soap dispensers and hand sanitizer dispensers.
- Install glass or plexiglass barriers where people have to meet to talk and exchange documents or materials (i.e., at secretarial work stations, customer service desks, etc.).
- Perform daily health checks.
- Require use of face masks
- Encourage use of gloves, etc.
- Utilize virtual instead of in-person team meetings.