



Guidance for Managing Suspected and/or Confirmed Cases of COVID-19 at Your Facility

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Functioning critical infrastructure is imperative during the response to the COVID-19 emergency for both public health and safety as well as community well-being. According to the [U.S. Department of Homeland Security](#), **certain critical infrastructure industries have a special responsibility in these times to continue operations.**

Promoting the ability of such workers to continue to work during periods of community restriction, access management, social distancing, or closure orders/directives is crucial to community resilience and continuity of essential functions.

Above all, employees of critical infrastructure industries should be able to come to work feeling confident that safeguards are in place to help protect their health and well-being during this critical time.

Examples of exemplary practices and federally recommended safeguards for mitigating COVID-19 include, but are not limited to:

- Designating an isolation room in the facility to separate employees potentially demonstrating symptoms of COVID-19;
- Providing employees (especially potentially infected individuals), with face masks (as available) and/or other protective equipment to wear when being transported from the isolation room to an exit; and
- Providing infected employees with a self-assessment for them to report their potential symptoms and exposure to medium- or high-risk areas in the facility to assist the organization with contact tracing.

This guidance below is intended to help facility leaders respond to **suspected** and/or **confirmed** cases of COVID-19, including steps related to investigating and documenting the situation; communicating with employees and helping employees feel safe at work; cleaning and disinfecting the workplace; and strategies for allowing previously infected individuals to return to work.

Employers should implement the recommendations in the CDC's [Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019](#) to help prevent and slow the spread of COVID-19 in the workplace.

Additional guidance based on traditional infection prevention and industrial hygiene practices can be found at the [Occupational Safety and Health Administration \(OSHA\)](#) website.

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Actions to consider if a person in your facility feels sick or displays symptoms of illness, but has not been tested for COVID-19

A person in your facility may notify you or your team that he/she is feeling ill or has symptoms of COVID-19 (e.g. fever, coughing, and/or shortness of breath). **When this happens, consider immediately isolating the person from others by moving them into a pre-designated sick room.** The following additional actions may also apply:

➤ If the person has **not yet arrived** at the facility, consider directing the person to:

- ✓ Stay home
- ✓ Contact their health care professional
- ✓ Monitor their symptoms
- ✓ Remain under home isolation precautions until the risk of secondary transmission to others is thought to be low (in consultation with health care providers and/or employee health services)

Note: Requirement for “return to work” note from health care provider should be a site leader decision, considering work policies, CDC recommendations, and capacity of health services in the community.

➤ If the person is **currently at the facility**, consider:

- ✓ Immediately isolating the person from others (e.g., move them into a pre-designated “sick room” away from others)
- ✓ Providing the individual with a face mask and/or other protective equipment to wear when being transported from isolation room to exit
- ✓ Placing them in contact with a health services representative
- ✓ Evaluating the situation:
 - If the person has significant reason to believe they were exposed to COVID-19 (for example, displaying symptoms plus specific knowledge that they were in close contact with another infected person), then refer to the guidance below for confirmed cases
 - If the person has symptoms only, and no additional reason to suspect COVID-19, consider directing the person to: go home; contact their health care professional; and monitor their symptoms
 - According to the CDC, employees with symptoms of acute respiratory illness are recommended to stay home until they are free of fever (100.4° F [38.0° C] or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g. cough suppressants).

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Actions to consider if a person in your facility is confirmed or has strong reason to suspect exposure to COVID-19

According to the CDC, critical infrastructure workers presenting symptoms of COVID-19 are among those [being prioritized for testing](#) by local and state health departments. If a person who has recently been in your facility tests positive for COVID-19 (or if there is significant reason to believe a person who is high-risk of having COVID-19 has recently been in your facility), consider **immediately isolating the person from others by moving them into a pre-designated sick room**. The following additional guidelines may also apply:

- Prioritize isolating the person from others inside the facility, per CDC guidance, and consider:
 - ✓ Separating sick employees immediately (e.g., move them into a pre-designated “sick room” away from others)
 - ✓ Providing the individual with a face mask and/or other protective equipment to wear when being transported from isolation room to exit
 - ✓ Providing employees with a self-assessment form so they can report their potential symptoms and exposure to medium- or high-risk areas in the facility
 - ✓ Directing the person to: go home; contact their healthcare professional; monitor their symptoms; remain under home isolation precautions until the risk of secondary transmission to others is thought to be low (in consultation with healthcare providers and/or employee health services)

- Investigate and implement action plan considerations
 - ✓ Assess the situation to quickly determine who the affected employee was in “close contact” with in the previous 14 days and where that person spent significant time while in the facility
 - CDC defines “close contact” as within 6 feet for a prolonged period of time or having direct contact with infectious secretions (e.g., being coughed on)
 - ✓ Implement action plan for isolation of areas, cleaning/disinfecting, and stakeholder communication (see below for additional guidance)
 - ✓ Notify your leadership/crisis team and determine if Human Resources is prepared to provide paid sick leave for employees who test positive
 - ✓ Document all internal/staff communications in writing

- **There are [potential legal considerations](#)** for both for an employee who has tested positive, as well as the other employees who are on the job site.

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- ✓ Just as you would investigate a workplace injury (i.e., slip and fall), investigate suspected or confirmed cases of COVID-19, and document your investigation
 - COVID-19 can be a recordable illness if a worker is infected as a result of an event or exposure in the work environment. However, employers are typically only responsible for recording cases of COVID-19 if all of the following are met:
 - The case is a confirmed case of COVID-19 (see [CDC information](#) on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19);
 - The case is work-related, as defined by 29 CFR 1904.5; and
 - The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (e.g. medical treatment beyond first-aid, days away from work)
- ✓ Remember that some employees may be legally entitled to certain special accommodations
 - An employee may have an underlying medical condition that makes them especially vulnerable to the coronavirus
 - Although the employer may have the right to ask for medical documentation to substantiate a disability, the federal government has advised that employers should consider relaxing that requirement especially if the employee may not be able to obtain the information in a timely way
- Cleaning and disinfecting considerations
 - ✓ Restrict and/or shut down areas deemed to be affected to allow for thorough cleaning and disinfecting
 - ✓ If appropriate for the situation, allow employees to remain at home for a time period to allow them to isolate during these procedures
 - ✓ Be prepared in advance to rapidly deploy a cleaning/disinfecting crew (e.g., consider training and leveraging rapid response teams that may already be in place)
 - ✓ For cleaning and disinfecting procedures, PPE, and chemicals, [please see additional guidance below](#)

Helping essential workers continue to feel protected at work following potential or confirmed case of COVID-19

At this time of heightened uncertainty, essential workers may feel gratitude for being employed, but also concern over potential workplace exposures that could impact their health and the health of their loved ones. In fact, the perception of an unsanitary work

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environment or heightened risk of exposure to the coronavirus has emerged as a top reason that employees may be hesitant to return to work.

Employers can help earn the trust of their employees and build confidence through timely and accurate communication about such exposures when or if they occur, and stepping up cleaning and disinfection procedures to demonstrate to employees the value placed on their safety.

- Consider communicating often and transparently with employees who depend on you for information and support. You may wish to:
 - ✓ Assign a specific leader to be responsible for communicating with employees, providing a consistent, reliable voice through a time of uncertainty
 - ✓ Use company email, text, or phone service to communicate with both affected and non-affected employees on the status of the suspected or confirmed COVID-19 case (but it is recommended NOT to share the name of the affected individual or specific medical diagnosis)
 - ✓ Create a place where employees can ask questions and get responses quickly (ask employees what THEY need during this uncertain time)
 - It may be appropriate and helpful to use peer-to-peer video conferencing platforms for site leaders to communicate face-to-face with employees (e.g., consider having a standing live video Q&A or other channel to keep communications always on and open)

- Respond thoughtfully to potential fears of an unsanitary work environment in order to help encourage employees to return to work
 - ✓ To compensate, some companies have begun to offer quarantine leave, overtime at double pay, and/or granting a leave of absence to workers with underlying health issues or childcare and eldercare issues
 - ✓ Consider making personal protective equipment as widely available as possible
 - ✓ Consider instituting mandatory workspace disinfection and hand sanitation breaks, where workers stop what they're doing to clean and disinfect their workstations and sanitize their hands
 - ✓ Following a confirmed case, it may be necessary to communicate with employees both morning and evening on the status of cleaning and disinfecting, plus any added measures that are being implemented to give employees confidence when returning to work
 - Consider making it easy for employees to stay home if they don't feel well or want to ensure the workplace is disinfected effectively following a confirmed case
 - Supervisors should consider how to maintain shift coverage and safety (e.g. having a backup employee "on call" for every shift)

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Utilizing essential resources for cleaning and disinfecting workplaces

Below are links to a list of EPA-approved products as well as CDC guidelines for cleaning and disinfecting a workplace following a suspected or confirmed case of COVID-19.

- Specifically for cleaning and disinfecting an employee's work area
 - ✓ CDC provides [detailed recommendations](#) for cleaning and disinfection that companies are recommended to follow
 - ✓ ACC's Center for Biocides Chemistries has an up-to-date list of over [900 ready-to-use, dilutable, and wipeable biocidal products](#) that are approved by the EPA as effective at killing viruses like COVID-19 (be sure to review them against a list of the chemicals at your site)
 - ✓ ACC's Chlorine Chemistry Division, in partnership with public health experts, has developed a [simple-to-use poster](#) illustrating the CDC's recommended procedure for disinfecting surfaces against the COVID-19 virus

- In addition to the CDC recommendations linked above, below are some general cleaning and disinfection tips to keep in mind:
 - ✓ Clean and disinfect any common areas the employee may have affected
 - ✓ Use disposable mop heads and cleaning cloths; dispose of them after use
 - ✓ All employees conducting cleaning and disinfecting should wear PPE for the chemical products used, including face and eye protection, and gloves as appropriate
 - ✓ Upon completion of cleaning and disinfecting activities, all PPE should be disposed of OR cleaned and disinfected
 - ✓ Cleaning personnel should wash hands thoroughly

Evaluating when critical employees who have been exposed to COVID-19 can return to work

To achieve continuity of operations of essential functions, [CDC advises](#) that critical infrastructure workers may be permitted to continue work following potential exposure to COVID-19, provided they remain asymptomatic and additional precautions are implemented to protect them and the community. A potential exposure means having close contact within [6 feet](#) of an individual with confirmed or suspected COVID-19. The timeframe for having contact with an individual includes the period of time of [48 hours](#) before the individual became symptomatic.

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- Critical infrastructure workers who have had an exposure but remain asymptomatic should consider the following practices prior to and during their work shift:
 - ✓ **Pre-Screen:** Employers may measure the employee's temperature and assess symptoms prior to them starting work. Ideally, temperature checks should happen before the individual enters the facility.
 - ✓ **Regular Monitoring:** As long as the employee doesn't have a temperature or symptoms, they may self-monitor under the supervision of their employer's occupational health program.
 - ✓ **Wear a Mask:** The employee should wear a face mask at all feasible times while in the workplace for 14 days after last exposure. Employers can issue face masks or can approve employees' supplied cloth face coverings in the event of shortages.
 - ✓ **Social Distance:** The employee should maintain 6 feet and practice social distancing as work duties permit in the workplace.
 - ✓ **Disinfect and Clean work spaces:** Clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment routinely.

- If the employee becomes sick during the day, consider [sending them home immediately](#).
 - ✓ Consider [cleaning and disinfecting](#) surfaces in their workspace
 - ✓ Consider compiling information on persons who had contact with the ill employee during the time the employee had symptoms and 2 days prior to symptoms
 - ✓ Others at the facility with close contact within 6 feet of the employee during this time would be considered exposed

Download a printable flyer for workplaces from the [CDC website](#).

Note: For a broader, nationwide reopening strategy, the American Enterprise Institute (AEI) has developed a [report outlining specific directions](#) for adapting public-health strategy to limit the spread of COVID-19 while transitioning to new tools and approaches to prevent further spread of the disease

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REFERENCES:

U.S. Government Agencies:

U.S. Centers for Disease Control and Prevention: “Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)” <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

U.S. Department of Labor Occupational Safety and Health Administration: COVID-19 Resource Center <https://www.osha.gov/SLTC/covid-19/>

Business Community:

American Chemistry Council: “Novel Coronavirus (COVID-19)-Fighting Products” <https://www.americanchemistry.com/Novel-Coronavirus-Fighting-Products-List.pdf>

American Enterprise Institute: “National Coronavirus Response: A Road Map to Reopening” <https://www.aei.org/research-products/report/national-coronavirus-response-a-road-map-to-reopening/>

Associated General Contractors of America: “Coronavirus - Safety, Health & Environmental Resources” <https://www.agc.org/coronavirus/safety-health-environmental-resources>

The Builders Association: “COVID-19 Construction Action Center” https://www.buildersassociation.com/Docs/NEW%20iMIS%20PDFs/COVID-19_Action_Center_rev28.3.pdf

The Hershey Company: “Site Leader Protocol Guidance” Internal Document (03/12/20)

National Association of Manufacturers: “COVID-19 Crisis Management for Manufacturing Operations – Immediate Best Practices” <https://www.nam.org/wp-content/uploads/2020/03/CDC-COVID-19-Guidance-for-Manufacturers-For-Web.pdf>

Water Quality & Health Council: “COVID-19 Surface Cleaning and Disinfection” <https://waterandhealth.org/resources/posters/#COVID-19>

Human Resources / Corporate Communications:

AEON: “Strengthening Employee Emotional Fitness: Anticipating the Needs of Employees in Response to COVID-19” <https://www.aon.com/getmedia/e6a86d43-5afc-4a3e-9ea1-02ae80555874/COVID-19-Strengthening-Employee-Emotional-Fitness-2020-04-10.aspx>

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AEON: "Coronavirus (COVID-19) Communication Plan"

<https://www.aon.com/getmedia/f6eccabb-933b-48e9-b571-83901a89ed94/Novel-Coronavirus-Communication-Plan-Sheet-COVID.aspx>

Ragan: "9 steps for communicating with employees during the COVID-19 crisis"

<https://www.ragan.com/9-steps-for-communicating-with-employees-during-the-covid-19-crisis/>

Legal Counsel:

Crowell & Moring LLP: "Coronavirus Resource Center"

<https://www.crowell.com/Practices/Coronavirus-COVID-19-Resource-Center>

Sidley Austin LLP: "COVID-19 U.S. Employment Law Update and Guidance for Employers"

<https://www.sidley.com/en/insights/newsupdates/2020/03/covid-19-us-employment-law-update-and-guidance-for-employers>