

# **Food Industry Recommended Protocols Following Employee/Customer COVID-19 Positive Test, Symptom Development or Exposure**

*As of May 27, 2020*

The voluntary industry guidance on this website (“Industry Guidance”) is based on recommendations received from a variety of sources, including federal agencies, state health authorities, and industry advisors. As recommended practices continue to evolve, guidance on these issues also may have been issued by federal agencies such as the Centers for Disease Control (CDC), the U.S. Department of Labor, state and local authorities, and others subsequent to the formulation of this Industry Guidance. For this reason, in addition to considering this Industry Guidance, readers are encouraged to review any and all updated guidance from either industry or governmental authorities, as well as any guidance that may be issued in the future, as it is expected that recommended practices will continue to evolve. Readers should also check this website for any updated versions of this Industry Guidance.

FBIA disclaims all (1) express and implied warranties and (2) any liability that may allegedly result as a result of reliance on this Industry Guidance.

Readers are also encouraged to exercise their best judgment in considering whether, due to their particular individual circumstances, it would be reasonable to implement additional measures to further reduce the risks related to COVID-19. Readers are further encouraged to consider any and all additional authoritative resources and advice.

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## A. Background

Farms, food production facilities, distributors, retailers and wholesalers are part of our nation's "critical infrastructure." All of these nodes in the food supply chain must remain operational to feed the country. Inconsistent approaches in reacting to food supply chain employees who test positive, are symptomatic and thus presumed positive, or have been exposed to someone that has tested positive or is symptomatic for COVID-19, could jeopardize our food system. This document provides a recommended, consistent approach for companies to adopt that allows for continued operations in the event that an employee(s) tests positive, is symptomatic and presumed positive, or is potentially exposed to someone else that tests positive or is symptomatic for COVID-19, given the high transmissibility of this respiratory virus from person to person and the global nature of this pandemic.

The following information is intended to assist companies in the food supply chain in making decisions on what steps to take when a worker has been reported to be: COVID-19 positive, symptomatic and presumed COVID-19 positive, or potentially exposed to someone who is COVID-19 positive or presumed positive. The steps are presented as a high-level checklist for businesses to consider. This guidance is not intended to replace or supersede federal, state, or local guidance or directive.

NOTE: CDC and OSHA guidance is evolving as more is learned.<sup>1</sup>

## B. Steps to Take When an Employee is Reported to be Positive or Symptomatic (Presumed Positive) for COVID-19

NOTE: Continuous education and training/retraining of all employees on COVID-19 risks, prevention, and related company policies, provided in the first language of workers is critical to slowing transmission and spread of COVID-19 in the workplace.

Farms, food manufacturing facilities, distribution centers, wholesale and retail outlets should consider the following as they prepare to respond to reports of an employee that tests positive for COVID-19 or that is presumed positive based on disease symptoms.

- Consider consulting the Food and Beverage Issues Alliance (FBIA) [COVID-19 Employee Symptoms/Testing Status-Based Decision Tool For Food Facilities](#)<sup>2</sup> for general steps to take in response to employee status with regard to COVID-19

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<sup>1</sup> The most up-to-date information is available at the CDC COVID-19 website: <https://www.cdc.gov/coronavirus/2019-nCoV/index.html>; and OSHA COVID-19 website: <https://www.osha.gov/SLTC/covid-19/>. See also: CDC Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>

<sup>2</sup> FBIA Resources: [Covid-19 Employee Symptoms/Testing Status-Based Decision Tool For Food Facilities](#); [www.feedingus.org](http://www.feedingus.org). (Accessed May 6, 2020)

symptoms, diagnostic and/or serologic testing results. The document also suggests criteria to be met before employees should return to work.

- Consider information provided in [FBI's COVID-19 Test Method Factsheet](#) that includes useful background on the different test methods available related to COVID-19.

In addition, companies should consider taking the following steps when an employee is confirmed positive for or is symptomatic and presumed positive for COVID-19:

- When an individual has symptoms of COVID-19 illness or when the employer learns that an employee had a positive result using an FDA emergency use authorized COVID-19 diagnostic test<sup>3,4</sup> or determined positive by a physician:
  - The employee should not be allowed to return to work, or if the sick individual is at work, he/she should be directed to go home.
  - Advise the individual to immediately self-isolate and consult a health care professional.
  - Alert local public health officials.
- Provide and share sick leave information and other applicable human resources information with the individual either via email or phone.
- Identify and contact other potentially exposed employees.<sup>5</sup> (See **Section II: Contact Tracing** below.)
- Complete and file an OSHA record/report if required. [OSHA's guidance](#)<sup>6</sup> says such a report<sup>7</sup> is required under the following circumstances:
  - There is a confirmed (tested positive) case of COVID-19;<sup>8</sup>
  - COVID-19 was contracted due to employee performing work-related duties;<sup>9</sup> AND,
  - The situation involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.<sup>10</sup>

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<sup>3</sup> FDA Coronavirus Disease 2019 (COVID-19) Emergency Use Authorizations for Medical Devices.

<https://www.fda.gov/medical-devices/emergency-situations-medical-devices/emergency-use-authorizations#COVID19ivd>

<sup>4</sup> FBI Resources: [Food and Beverage Industry COVID-19 Test Method Factsheet](#). [www.feedingus.org](http://www.feedingus.org) (Accessed May 6, 2020)

<sup>5</sup> Contact Tracing. <https://www.cdc.gov/coronavirus/2019-ncov/php/open-america/contact-tracing.html>. Accessed May 2, 2020.

<sup>6</sup> FBI Resources: Recording of COVID-19 Work-Related Illness Under the Occupational Safety and Health Administration's (OSHA) Recordkeeping Requirements. [www.feedingus.org](http://www.feedingus.org). Accessed May 2, 2020.

<sup>7</sup> <https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>. Accessed May 2, 2020.

<sup>8</sup> A confirmed case of COVID-19 means an individual with at least one respiratory specimen that tested positive for SARS-CoV-2, the virus that causes COVID-19. See [www.cdc.gov/coronavirus/2019-ncov/php/reporting-pui.html](http://www.cdc.gov/coronavirus/2019-ncov/php/reporting-pui.html).

<https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>. Accessed May 2, 2020

<sup>9</sup> Under 29 CFR § 1904.5, an employer must consider an injury or illness to be work-related if an event or exposure in the work environment (as defined by 29 CFR § 1904.5(b)(1)) either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception in 29 CFR § 1904.5(b)(2) specifically applies. See [www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.5](http://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.5). <https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>. Accessed May 2, 2020.

<sup>10</sup> Under 29 CFR § 1904.7, an employer must consider an injury or illness to meet the general recording criteria, and therefore to be recordable, if it results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness. An employer must also consider a case to meet the general recording criteria if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional,

- Clean and disinfect surfaces to limit employee exposure. (See **Cleaning and Disinfection Guidelines** below.)
  - Because transmission occurs from person-to-person, a facility/location may not need to shut down as a result of an employee, visitor, or other individual testing positive for COVID-19 if transmission can be mitigated. Quickly identifying potentially exposed individuals and disinfection of potentially contaminated areas can help ensure operations continue with minimal interruption. However, after identifying potential exposed areas, some specific areas in the facility may require closing and restricting movement through these areas until adequately cleaned and disinfected.

### **C. Steps to Be Taken When an Employee/Visitor/Customer Is Potentially Exposed (In Close Contact) With an Individual Who Is Positive/Presumed Positive for COVID-19**

- Develop/adopt a risk management approach/tool to react to a worker that is COVID-19 positive, symptomatic and presumed positive, or potentially exposed to a worker or someone outside the workplace that is COVID-19 positive or symptomatic. Consider using the FBIA tool - **COVID-19 RELATED DECISION TOOL FOR FOOD FACILITIES** found at [www.feedingus.org](http://www.feedingus.org).
- Identify potentially exposed individuals (e.g., those that were in close contact with the infected individual). See **Section II: Contact Tracing** below for details on how to identify potentially exposed individuals.
- CDC advises that critical infrastructure workers may be permitted to continue work following potential exposure to individuals with active COVID-19, provided they remain asymptomatic and additional precautions are implemented to protect them and the community and after surfaces used by the potentially exposed individuals in the facility are cleaned and disinfected, as described below.<sup>11</sup>
- Close contact (leading to risk of potential exposure) is defined by CDC as:
  - Within approximately 6 feet (2 meters) of a COVID-19 case for at least 10-30 minutes; close contact can occur while caring for, living with, visiting, or sharing a healthcare waiting area or room with a COVID-19 case; OR,
  - Having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on).
  - NOTE: Short term exposure, such as walking past someone that is COVID-19 positive/presumed positive, is not “close contact.”
- In accordance with the Health Insurance Portability and Accountability Act (HIPAA) requirements, inform individuals of potential exposure while maintaining employee confidentiality.

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even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. See [www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.7](http://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.7).

<https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>.

Accessed May 2, 2020.

<sup>11</sup> Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19. <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>. Accessed May 2, 2020.

- Working with local authorities and the healthcare providers of the individuals that are identified with potential exposure, consider if it is appropriate to take any of the following actions:
  - At a minimum, based on community transmission in the area of the facility, individual health factors, and other risk factors, consider having these individuals self-monitor for symptoms<sup>12</sup> associated with COVID-19. <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>;
  - If symptoms arise, the employee should be sent home immediately and surfaces in their workspace should be cleaned and disinfected. Employees and/or the company should also contact (e.g., by phone) their local health department and health care provider to determine next steps;
  - In consultation with local authorities and depending on the circumstances of exposure, employees may return to work and should wear a [face mask/covering](#) at all times while in the workplace for 14 days since the time they might have been exposed or came in close contact with an infected individual. They should practice [social \(physical\) distancing](#) and continue to self-monitor for symptoms; and
  - Employers should measure the employee's temperature and assess symptoms prior to returning to work. Temperature checks should happen before the individual enters the facility.

In the CDC Risk Assessment titled [Interim US Guidance for Risk Assessment and Public Health Management of Persons with Potential Coronavirus Disease 2019 \(COVID-19\) Exposures: Geographic Risk and Contacts of Laboratory-Confirmed Cases](#), the agency notes "some personnel fill essential (critical) infrastructure roles within communities. The Department of Homeland Security identifies Essential Critical Infrastructure Workforce at <https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce>. Based on the needs of individual jurisdictions, **and at the discretion of state or local health authorities, these personnel may be permitted to continue work following potential exposure to COVID-19 (either travel-associated or close contact to an individual who has tested positive for COVID-19)**, provided they remain asymptomatic. Personnel who are permitted to work following an exposure should self-monitor under the supervision of their employer's occupational health program including taking their temperature before each work shift to ensure they remain afebrile. On days these individuals are scheduled to work, the employer's occupational health program could consider measuring temperature and assessing symptoms prior to their starting work."

#### **D. Cleaning and Disinfection Guidelines Following Reports of an Employee that is Positive or Symptomatic (Presumed Positive) for COVID-19**

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<sup>12</sup> CDC. Symptoms of Coronavirus. <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html> (Accessed May 6, 2020)

- As soon as an employee is reported to be positive for COVID-19 or presumed positive because he/she has symptoms associated with this illness, clean and disinfect the facility according to CDC guidance at <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>.
- Existing sanitation standard operating procedures (SSOPs) including cleaning and sanitizing processes for food contact surfaces and processing equipment should serve to mitigate the COVID-19 hazard and the potential spread of COVID-19. With that said, other surfaces in the facility environment that are not routinely targeted in SSOPs may need to be targeted if the infected individual is known to have or could have come in close contact with them.
- EPA registered disinfectants should be used. NOTE: Food facilities are required to use EPA-registered “sanitizer” products in their cleaning and sanitizing practices.
  - There is a list of EPA-registered “disinfectant” products for COVID-19 on the [Disinfectants for Use Against SARS-CoV-2 list](#) that have qualified under EPA’s [emerging viral pathogen program](#) for use against the coronavirus strain that causes COVID-19.
  - **IMPORTANT:** Check the product label guidelines for if and where these disinfectant products are safe and recommended for use in food manufacturing areas or food establishments.
- Clean and disinfect all public areas including lunchrooms, restrooms, locker rooms, entry ways and hallways. Special attention should be paid to frequently touched surfaces in public areas such as doorknobs, stairwell railings, computer areas, keyboards, telephones, touch screens, control panels, time clocks and tabletops.
- Consider increased ventilation in all non-production areas and if possible, all production areas, in accordance with GMPs.

#### **E. Other Actions to Consider Taking to Limit Further Spread of COVID-19 within the Facility**

- Identify the sick individual’s work area, traffic patterns, locker – document and designate these areas for further action.
- Consider closure of specific areas in the facility and restricting movement through these areas until adequate cleaning and disinfection is conducted.
- Consider suspending production activities in specific areas until adequate cleaning, sanitizing and/or disinfecting is conducted.
- Modify facility operations to minimize the impact if an employee tests positive/becomes symptomatic for COVID-19. For example:
  - Establish smaller cohorts of employees so if one tests positive, those potentially exposed are limited to the cohort group.
  - Restrict staff rotations between different areas in the facility, job types/functions, and shifts to more easily identify those potentially exposed in the event an employee becomes infected with COVID-19.
  - Limit facility access to employees only and other critical visitors (e.g., inspectors, delivery drivers).

- Do not permit congregating in common areas of the facility by establishing additional areas for timeclocks, breaks, meals and locker rooms and restrooms. Limit the number employees permitted in each location, making sure seating in such areas follows physical distancing recommendations.
- Consider smaller cohorts for breaks, meals and locker room access. Plan for additional times between employee breaks for any needed cleaning prior to the next group arriving.
- Establish system to capture contact information for potentially exposed individuals and workspace/equipment/common areas. i.e., spreadsheet, form.
- Determine whether all exposed persons will be required to quarantine or will be allowed to continue work if they remain asymptomatic and adhere to CDC practices.
- If it is determined that exposed persons are required to quarantine, develop a quarantine policy for potentially exposed employees.
- Determine how infected or potentially exposed employees will be integrated back into the workplace, e.g., timeline of isolation, mandatory symptom confirmation.
- Assure you have up-to-date contact information for all employees.
- Develop scripts to be used for notifying potentially exposed employees so these employees are all communicated with and provided the same information in the same manner.

## F. Disposition of Food

- There is currently no evidence to support that the COVID-19 virus is transmitted to humans through food or food packaging materials.
- The FDA does not anticipate that food will need to be held, recalled or withdrawn from the market due to possible exposure from a food manufacturing/processing employee who has tested positive for COVID-19 .<sup>13</sup>

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## SECTION II: CONTACT TRACING: CONSIDERATIONS FOR FOOD FACILITIES WHEN IDENTIFYING POTENTIALLY EXPOSED WORKERS

### A. Background

During a public health event, public health officials, including epidemiologists, use the term “contact tracing” to describe the process for identifying persons that have may have come into direct contact with an infected person. “Contact tracing” is typically performed in the United

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<sup>13</sup> <https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19>. Accessed May 2, 2020.

States by state and local public health departments using staff that is trained in contact tracing protocols.

Contact tracing as it pertains to the COVID-19 pandemic is the identification of persons who may have been exposed to someone diagnosed with COVID-19 or that is symptomatic for COVID-19 given testing is not broadly accessible.<sup>14</sup>

Food operators and businesses may assess the potential for further exposure within their workforce by reviewing the COVID-19 positive or symptomatic worker's function(s), physical areas of movement and activity, interaction with other workers, etc., and consider steps to minimize the spread of COVID-19. The processes businesses deploy to assess potential exposure among other workers are different and in addition to contact tracing conducted by trained state and local public health officials to manage the spread of infection in communities. To manage COVID-19 risks among other workers, it is also critical for companies to closely review current policies and procedures and assure they align with the latest federal, state and local guidance. Companies should also develop and implement a risk management approach that considers, among other things, the company's specific operations.

The following considerations are based on what we presently know about the virus and are provided to assist companies in reviewing and amending current policies as related to identifying potentially exposed workers so that such workers can be notified and other relevant actions pertaining to the facility, including targeted cleaning, can be taken in a timely manner.

***Ultimately, each company will need to develop and implement their own policies tailored to their specific facilities, capabilities and risks.***

## **B. Current Guidance Applicable to Critical Infrastructure Workers**

Manufacturing, processing, packing, holding, distribution and retail facilities are encountering employees that are symptomatic/confirmed positive for COVID-19. When workers are positive/symptomatic for COVID-19, facilities may assess the potential of exposure to other workers and share this information with local/state or federal public health authorities to inform potential next steps. The actions taken by a facility regarding potentially exposed workers will depend on a number of factors including: available federal guidance, state and local requirements, current community spread of COVID-19, facility design and operations, and the ability to prevent further exposure in the facility by taking precautions such as worker screening prior to entering work areas, providing workers with PPE and/or facial coverings or masks, implementation of social distancing, and enhanced cleaning and disinfection.

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<sup>14</sup> Typically, an individual with suspected or confirmed COVID-19 infection is asked to recall everyone whom they have had close contact during the timeframe while they may have been infected. Those identified individuals are then notified of their potential exposure as rapidly as possible. To protect the patient or individuals' privacy, those identified individuals are only informed that they may have been exposed to a patient and are not told the patient's identity. [www.cdc.gov/coronavirus/2019-ncov/php/principles-contact-tracing.html](https://www.cdc.gov/coronavirus/2019-ncov/php/principles-contact-tracing.html). Accessed April 23, 2020.



CDC defines *potential exposure* as a household contact or having close contact within 6 feet of an individual with confirmed or suspected COVID-19 for a sufficient duration of time, sometimes referenced as 10 minutes or more.<sup>15</sup>

CDC's guidance and the advice contained therein has evolved substantially as more is learned about the virus that causes COVID-19. Initially CDC advised employers to quarantine all potentially exposed workers for 14 days. Then CDC advised employers to send all potentially exposed workers home and if they remained asymptomatic for 48 hours they could return to work. **Now, as stated above, CDC is advising employers that potentially exposed workers can remain working, as long as appropriate precautions are taken and they remain asymptomatic.**<sup>16</sup>

*Note: State and local governments may choose to not permit critical infrastructure workers that have been identified as potentially exposed to COVID-19 to continue working; companies need to understand state and local requirements in these situations as they may require that potentially exposed individuals be quarantined or home isolated.*

**Given that every facility is constructed differently and has different access points, congregation areas and established patterns of employee movement, procedures for assessing exposure to other workers need to be facility specific.**

### C. Contact Tracing

Once a worker is confirmed to be infected with the virus or becomes symptomatic, their contacts or potentially exposed workers can be identified by retracing the ill worker's activities (and the activities and roles of those around them) since the onset of illness and several days (at least 48 hours) prior to the onset of illness. Contacts or potentially exposed workers are anyone who has been in *close contact* (as defined by CDC and discussed above) with an infected person: family members, work colleagues, friends, healthcare providers or others. Companies/facilities can assist local/state public health authorities in helping with contact tracing among employees, particularly with regard to potential exposures at the work place. Investigation of potential exposures that occur outside the facility, should be done by the local and state public health authorities. For additional resources see [CDC's Contact Tracing](#) site.<sup>17</sup>

Questions and examples to consider include:

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<sup>15</sup> Public Health Recommendations for Community-Related Exposure. <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>. Accessed April 23, 2020.

<sup>16</sup> CDC. [Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19](#). Accessed May 26, 2020.

<sup>17</sup> CDC. COVID-19 Contact Tracing Training Guidance and Resources. <https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/index.html>. Accessed May 6, 2020

1. Ask the positive individual to answer the following questions as soon as possible via email or phone:
  - a. Has anyone in your family tested positive for COVID-19, shown COVID-19 symptoms or been sick, if so, how many?
    - i. If they share housing, are the roommates or family members also employees in the same facility?
  - b. Have you visited other locations outside your workplace and home in the past 48 hours, if so, where have you been?
    - i. If so, did it include interactions with other employees?
  - c. Have you car-pooled with others to work or other locations in the past 48 hours, if so, with whom?
    - i. If so, did it include interactions with other employees?
  - d. Have you taken public transportation to work or other locations in the past 48 hours?
    - i. If so, did it include interactions with other employees?
  - e. Have you congregated with others in larger numbers (>5 persons), if so, with whom?
    - i. If they have been socializing with other employees after work hours?
2. Identify the sick individual's shifts and movements within the facility for the last 48 hours, the group(s) of employees that worked during these shifts, and those employees that were in close contact with the sick individual (within 6 feet for at least 10-30 minutes).<sup>18,19</sup>
  - a. Track movement and interaction of the infected person through the facility. Use of closed-circuit TV monitors, fobs, keycards, timeclocks, or other systems that indicate locations that the ill worker accessed (and using those systems/data to identify other individuals in those spaces)
  - b. Determine if there were any employees that were absent over the past 48 hours from the shifts that the sick individual worked or if there were any staffing changes to the shifts in question e.g., an employee that typically does not work the shift substituted for the one that called out.
3. Identify any employees considered to be at higher risk for serious illness, i.e., older adults in the facility, individuals with known co-morbidities or pre-diagnosed conditions and follow CDC guidance.<sup>20</sup>

## D. Contact Listing

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<sup>18</sup> CDC Guidance, Public Health Recommendations for Community-Related Exposure \*Data are insufficient to precisely define the duration of time that constitutes a prolonged exposure. Recommendations vary on the length of time of exposure from 10 minutes or more to 30 minutes or more. In healthcare settings, it is reasonable to define a prolonged exposure as any exposure greater than a few minutes because the contact is someone who is ill. Brief interactions are less likely to result in transmission; however, symptoms and the type of interaction (e.g., did the person cough directly into the face of the individual) remain important. <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>. Accessed May 2, 2020.

<sup>20</sup> What You Can do if You are at Higher Risk of Severe Illness from COVID-19. <https://www.cdc.gov/coronavirus/2019-ncov/downloads/COVID19-What-You-Can-Do-High-Risk.pdf>. Accessed May 4, 2020.

- Discuss potential exposure with each identified employee (without revealing the name of the COVID-19 positive individual).
- Obtain the following information from each identified employee with potential exposure:
  - Where they have worked in the facility in the last 48 hours including their movement and interactions with other employees.
  - If they are aware of any ill persons in their homes or at work.
  - If they share housing with roommates or family members that also work in the same facility.
  - If they have been socializing with other employees after work hours.
  - If they have congregated with others in larger numbers (>5 persons)?
- Perform an initial screening of each employee with potential exposure for COVID-19 symptoms per CDC guidance.<sup>21</sup>
- Advise each employee with potential exposure to self-monitor at least 48 hours following notification that they may have been exposed.
- Monitor and screen employees with potential exposure regularly or at least for 48 hours of identifying them as an employee with potential exposure.
- Provide adequate personal protection equipment (PPE) and take added precautionary measures for employees with potential exposure.
  - While not PPE, companies should consider mandatory use of facial coverings/face masks and consider the use of face shields over facial coverings/face masks.
  - Retrain these employees on personal hygiene practices including good hand hygienic practices.
  - Make any accommodations necessary to maintain appropriate physical distancing for individuals identified with potential exposure in the workplace. This could include the use of barriers or partitions that are cleanable.
- Determine if potentially exposed employees need to be sent home, need further health monitoring or health care.
- Determine if potentially exposed employees can remain working (with appropriate PPE, distancing, etc.), should be restricted from certain areas of the facility or not permitted to perform certain functions for at least 48 hours.

## E. Contact Follow-Up

- **Appropriate** follow-up should be conducted with potential contacts or potentially exposed workers to monitor for symptoms, test for signs of infection, recommend appropriate care.
- Require potentially exposed employees to self-isolate at home if symptomatic (or allow them to continue work if they remain asymptomatic and adhere to CDC practices).

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<sup>21</sup> Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19. <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>. Accessed May 2, 2020.

- Contact local health department for assistance and reporting (if required in the state or local jurisdiction in which the facility is located), including determining if tests are available for employees.

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**See also:**

***CDC 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>***

***OSHA Guidance on Preparing Workplaces for COVID-19: <https://www.osha.gov/Publications/OSHA3990.pdf>***

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