Healthy Workplace: The Role of Employers in Effective Contact Tracing

Prepared by Challenge Seattle
July 2020
Challenge Seattle is an alliance of CEOs from the Greater Seattle region’s largest employers committed to creating opportunity and a vibrant, sustainable future for everyone who lives and works in our region. Led by former Washington State Governor Christine Gregoire, Challenge Seattle harnesses the committed leadership, collective voice, and combined resources of its member companies to find innovative solutions and inspire partnership and collective action for the greater good.

This document is based on the best available information from federal, state, and local Public Health authorities and best practices developed by employers to date. It was developed in partnership with state and local Public Health experts.

The document is intended to be a guide for consideration only and does not include legal or regulatory advice or recommendations on how to address the specific COVID-19 situation for your business or employees. This document does not: (i) constitute medical or safety advice, nor be a substitute for the same; nor should it (ii) be seen as a formal endorsement or recommendation of a particular response. As such you are advised to make your own assessment as to the appropriate course of action to take, using this presentation as guidance. Please carefully consider local laws and guidance in your area, particularly the most recent advice issued by your local (and national) health authorities, before making any decision.

Date of Publication: July 1, 2020
INTRODUCTION

Contact tracing is a critical tool in a community’s effort to stop the spread of COVID-19 as stay at home measures are lifted. Contact tracing stops the chain of transmission through rapid isolation of positive cases and identification and quarantine of those in “close contact” with a positive case during the infectious period.

Employers play a vital role in contact tracing. With a responsibility to provide a safe workplace, employers have a vested interest in quickly notifying employees of potential exposure to COVID-19 to keep employees healthy, maintain customer and employee confidence, and reduce the need to close facilities.

The key steps employers can take to prepare their workplace to support contact tracing efforts are:

1) **Be prepared & make a plan**
2) **Establish a COVID-19 point of contact**
3) **Strengthen channels to quickly identify COVID-19 cases**
4) **Take swift action once a case has been identified:**
   a. **Support** the sick employee
   b. **Protect** the health and safety of others in the workplace
   c. **Partner** with Public Health to reduce workplace and community transmission

This document provides recommended actions for employers in each of these roles and provides practical advice on how to prepare for the potential of having to confront COVID-19 in the workplace.

Contact tracing plays a central role in WA’s “Safe Start” plan.
It is likely that an employer will experience exposure to COVID-19 in the workplace during the pandemic, necessitating quick action to notify those with possible exposure and requiring affected employees to isolate or quarantine. There are steps you can take now to prepare:

1. **Develop a Response Plan:**
   - Write a response action plan, detailing the steps to take when there is an exposure in the workplace, and including return to work criteria following isolation and quarantine (see below).
   - Train managers on plan.
   - Communicate plan to employees.
   - Conduct a tabletop exercise to run through various possible scenarios.

2. **Review Benefits/Employee Policies:**
   - Update sick leave benefits to cover quarantining and isolation scenarios.
   - Explore providing “Quarantine/Isolation” benefits to support affected employees.
   - Review policies to ensure they support compliance and address non-compliance.

3. **Develop a Communications Plan** and create templates for communicating with affected employees, close contacts, customers, vendors, visitors, and other key stakeholders.

4. **Close Contact Data Preparation:**
   - Ensure you have up-to-date contact information for all employees.
   - Implement voluntary name/date/contact information data collection system for all visitors, vendors, customers, and patients.
   - Develop a system to be able to quickly access potential close contacts.

Finally, remember that the best strategy is prevention. Ensure robust health and safety protocols are in place to reduce transmission in the workplace, such as those outlined in the CDC’s Resuming Business Toolkit.
### CDC Guidelines: When is it safe to return to work?

<table>
<thead>
<tr>
<th>Case Type</th>
<th>Symptomatic Confirmed COVID-19 Case</th>
<th>Asymptomatic Confirmed COVID-19 Case</th>
<th>Symptomatic Suspected COVID-19 Case</th>
<th>Close Contact with Confirmed COVID-19 Case</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action:</td>
<td>Isolate</td>
<td>Isolate</td>
<td>Isolate</td>
<td>Quarantine</td>
</tr>
<tr>
<td>Minimum time:</td>
<td>10 days since symptoms first appeared</td>
<td>10 days since positive test result with no symptoms</td>
<td>10 days since symptoms first appeared</td>
<td>14 days since last known contact</td>
</tr>
<tr>
<td>Symptom status before return:</td>
<td>Improved symptoms</td>
<td>No symptoms</td>
<td>Improved symptoms</td>
<td>No symptoms</td>
</tr>
<tr>
<td>Fever status before return:</td>
<td>No fever for 3 days without the use of medication</td>
<td>No fever for 3 days without the use of medication</td>
<td>No fever</td>
<td></td>
</tr>
<tr>
<td>Notes:</td>
<td>All 3 must be met</td>
<td>If symptoms appear, follow guidelines for symptomatic confirmed COVID-19 case</td>
<td>All 3 must be met</td>
<td>When to test: 1) If symptoms develop, test. If negative, return after 14 days. However, if there is a high suspicion of COVID-19, regardless of test result, treat like suspected/confirmed case 2) If no symptoms, test no sooner than 48 hours from last known exposure. (If the exact exposure date is unknown or is ongoing, immediate testing is appropriate.) If negative, return after 14 days</td>
</tr>
</tbody>
</table>

#### Quarantine vs. Isolation: What is the difference?

**Quarantine** is keeping someone who might have been exposed to COVID-19 away from others to stop the spread of the disease, which can occur before someone knows they are sick or have symptoms. People in quarantine should stay home, separate themselves from others, monitor their health, and follow directions from Public Health. Quarantine is advised for 14 days as it can take that long for symptoms to develop. If symptoms or a test during the 14-day period indicate that the quarantined person has COVID-19, the person should begin isolation.

**Isolation** is keeping a suspected or confirmed COVID-19 positive case away from others to prevent the disease from spreading. Isolation is advised for at least 10 days—plus 3 days after a fever resolves without medication—to ensure the infectious period is over and it is safe to be around others.
Employers should identify a central point of contact (POC) who will receive information about all suspected or confirmed COVID-19 cases as well as identifying and notifying potential close contacts. The POC plays two critical roles:

1. **Public Health Liaison:** The POC will be the identified liaison with Public Health and will be the first contact for Public Health regarding COVID-19 cases that may affect the workplace. Employers should also establish one or more back-ups for the POC. Train reception staff to direct incoming Public Health calls to the POC.

2. **Central Internal Contact:** Employees and managers should report all suspected and confirmed cases to the POC to ensure consistent response, seamless interface with Public Health, and centralized tracking. All employees should know who the POC is and how to contact them.

**Employee Confidentiality:** State and federal laws protect the privacy of personal health information. Ensure that the POC fully understands the responsibility to respect employee confidentiality. Specifically, the POC should limit the access and amount of information shared to only what is operationally needed. POCs should be specifically instructed that they cannot divulge personally identifying information—including name—to other employees and must maintain the confidentiality of this information. In some cases, the absence of a specific employee combined with notification to close contacts may reveal the identity of a confirmed or suspected case. However, as long as the employer does not specifically reveal the name or other confidential health information, the employer should proceed to notify close contacts to secure the health and safety of the workplace.
Employers should take steps to ensure possible exposure to COVID-19 in the workplace is identified as quickly as possible.

1. **Direct employee to self-report**: Direct employees to stay home if they are sick or were exposed to COVID-19 in the past 14 days. When an employee reports illness at work or calls in sick, ask the employee whether he or she is experiencing any COVID-19 symptoms. Direct employees to report if they have received a positive test or have been in close contact with a confirmed COVID-19 case.

2. **Require daily health screening**: Institute a required confidential daily health screening of all employees. Employer should require self-attestation or other screening protocols to help identify potential cases prior to each working shift. Specifically, ask employees every day if they:
   - Have any COVID-19 symptoms?
   - Have received a positive COVID-19 test result for active virus?
   - Have had close contact with someone who is suspected or confirmed COVID-19 positive?

3. **Establish connection with Public Health**: As state and local health departments ramp up case investigations and contact tracing, Public Health representatives are expected to contact employers via the POC to inform them that a person with confirmed COVID-19 reported being in the workplace during the infectious period. Public Health will also call to offer support in the case of an outbreak, defined as two or more cases appearing in the workplace within a 14-day period. Public Health will share the name and contagious time period of the confirmed COVID-19 case.

**COVID-19 Symptoms – How to assess for a suspected case?**

Many COVID-19 symptoms are general in nature and are also present with some non-infectious ailments, such as seasonal allergies. One strategy for assessing possible cases flagged through symptom screening is to follow the **CDC definition** of a clinical case based on the presence of symptoms as summarized in the table below. If there is any doubt, it is safest to remove the employee and encourage testing for COVID-19.

<table>
<thead>
<tr>
<th>At least 2 of the following symptoms:</th>
<th>OR</th>
<th>At least 1 of the following symptoms:</th>
<th>OR</th>
<th>Any symptoms if individual has had contact with anyone who has been diagnosed with COVID-19</th>
</tr>
</thead>
<tbody>
<tr>
<td>fever, chills, rigors, muscle pain, headache, sore throat, new smell/ taste disorder(s)</td>
<td></td>
<td>cough, shortness of breath, difficulty breathing</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
TAKE SWIFT ACTION ONCE A CASE HAS BEEN IDENTIFIED

Once a suspected or confirmed case is identified, the employer plays three critical roles:

1. Support the sick employee;
2. Protect the health and safety of others in the workplace;
3. Partner with Public Health to reduce workplace and community transmission.

#1 Support the sick employee:

Safe Transport: If employee is at the workplace, immediately separate from others, arrange safe transport home or to medical facility as needed.

Stay Home: Direct employee to self-isolate until CDC guidelines are met.

Information, Testing, Support:
- Encourage employee to be in contact with their medical provider and direct them to the CDC to find more information about the disease.
- Strongly recommend timely testing if suspected case. If the exposure date is known, employees should be tested no sooner than 48 hours after exposure.
- Provide sick leave and benefit information to support isolation.
- Provide contact information for POC for any needed follow up.
- Public Health Follow-up: Let employee know that Public Health contact tracers may be contacting them, what to expect, and why their cooperation will help keep our community and others safe.

#2 Protect the health and safety of others in the workplace:

1. Identify and inform workplace close contacts within 24 hours.
   - Identify any close contacts (within 6 feet for more than 15 min) that the suspected or confirmed COVID-19 employee had in the workplace in the 48 hours prior to the onset of symptoms or prior to a confirmed test if the COVID-19 positive person is asymptomatic. Remember – do not disclose the name of the contact unless you have express written consent from the employee.
     - Review logs/ databases/ video footage of who was present at the worksite.
- Review employee badge data/calendars
- Ask employee and supervisor for their recollections and cross reference with other data sources
- If you learn about a case from Public Health, they may provide some names of contacts
  - Communicate possible exposure to close workplace contacts. *Remember – do not disclose the name of the contact unless you have express written consent from the employee.*
    - Inform them that they were in close contact with a suspected or confirmed COVID-19 case
    - Instruct them to put on a face covering if not currently wearing one, immediately separate from others, and ensure safe transport home
    - Direct them to quarantine for 14 days
    - Strongly recommend testing to assist with further contact tracing. *Note – quarantine period remains 14 days regardless of test results as it takes up to 14 days for the virus to incubate*
      - If the exposure date is known, test no sooner than 48 hours after the exposure
      - If the exposure date is unknown, or if the exposure was continuous, immediate testing is recommended
- Provide information including:
  - [CDC guidance](https://www.cdc.gov) for disease monitoring, symptoms, and avoiding contact
  - [What to expect](https://www.cdc.gov) from Public Health contact tracers
  - Sick leave and other benefits alleviate economic or adverse employment impact concerns
  - Criteria for when return to work

2. **Communicate out to larger impacted workforce**, as determined appropriate.
   - Be transparent about confirmed cases and close contacts to maintain employee confidence while taking steps to protect employee confidentiality
   - Announce steps being taken to reduce transmission
   - Restate all employees’ responsibilities to reduce transmission and direct them to resources where they can find additional information
   - Provide COVID-19 POC contact information for any questions or concerns

3. **Clean and disinfect affected area:**
   - Close off affected areas until they can be cleaned and disinfected
   - Perform a deep clean of affected areas in accordance with [CDC guidelines](https://www.cdc.gov)
#3 Partner with Public Health to reduce community transmission:

1. **Assist Investigation**: During a contract tracing investigation, Public Health may reach out to employers for assistance in identifying and communicating with close contacts. To speed these investigations and help slow community spread, be ready to provide Public Health investigators with the information you might have about COVID-19 positive individuals and their close contacts in the workplace. Below is a sample template that illustrates the type of information that may be requested by Public Health.

2. **Mitigate Spread**: Work to prevent and contain a potential outbreak in your workplace:
   - Be prepared to shut down operations in affected areas if necessary
   - Assist Public Health in communication
   - Help facilitate large-scale testing if necessary
   - Engage with Public Health in a workplace assessment to identify actions that could reduce further transmission

**Sample Template for Assisting Public Health Investigation:**

For all known cases and close contacts of positive cases in the workplace, please provide:

<table>
<thead>
<tr>
<th>Contact</th>
<th>Person #1</th>
<th>Person #2</th>
<th>Etc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Known case or close contact?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>First and last name:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phone number:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of birth:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primary language:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Specific role within the business and degree of interaction with colleagues and the public:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>If contractor, name of contracting agency:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Symptom onset date (for known cases):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dates of exposure (when did the person last work with the positive employee) (for close contacts):</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Thank You

Additional employer resources are available at: challengeseattle.com/covid-19