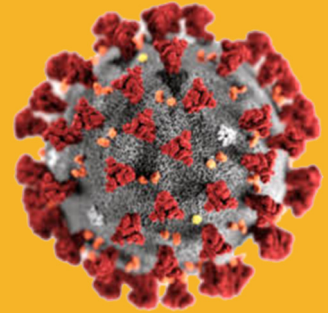




TEAMSTERS SAFETY & HEALTH COVID-19 Guidance



COVID-19 POSITIVE CASE INVESTIGATION FOR GENERAL INDUSTRY WORKPLACES (CONTACT TRACING)

November 17, 2021

COVID-19 is a nationally notifiable disease, which means, when diagnosed or identified, healthcare providers and laboratories must report this information to the state, local, and territorial (STLT) health departments. Health departments are responsible for leading case investigations, contact tracing¹, and outbreak investigations.²³ Using this reporting strategy, public health professionals can get ahead of infectious diseases, prevent further spread, and lower the need for business closures.

In general, when a COVID-19 case is identified that impacts a workplace, the health department may conduct interviews, site visits, and review records to identify close contacts who may have been exposed to the virus. If there is an agreement that the employer will identify workplace contacts, the health department will take responsibility for case investigation and contact tracing outside the workplace.

Diseases commonly performed contact tracing include novel virus infections (e.g., SARS-CoV, H1N1, and SARS-CoV-2, the virus that causes COVID-19), tuberculosis, vaccine-preventable infections like measles, blood-borne infections, Ebola, and some serious bacterial infections.

EMPLOYERS' RIGHTS AND RESPONSIBILITIES

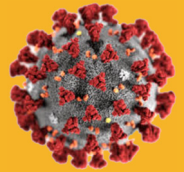
Contact tracing should be a part of a COVID-19 preparedness, response, and control plan developed and implemented by the employer.

Employers can limit entry into the workplace by employees based on the employer's fitness-for-duty policies, but employers cannot ask about workers' activities or contacts outside of work.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/contact-tracing.html>

² https://www.cdc.gov/coronavirus/2019-ncov/downloads/Infographic_COVID-19_Case_Investigation-Employers-Helping-Health-Departments.pdf

³ <https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/when-to-investigate.html>



“...all activities and information collected by an employer should be limited to the work setting and be consistent with applicable local, state, and federal privacy laws, health/medical laws, and workplace laws and regulations (i.e., U.S. Equal Employment Opportunity Commission (EEOC) and Americans with Disabilities Act (ADA))⁴”.

CASE INVESTIGATION AND CONTACT TRACING

In public health, **case investigation** identifies and investigates individuals with confirmed and probable diagnoses of a reportable communicable disease, such as COVID-19.

Contact tracing follows case investigation and is a process to identify, monitor, and support individuals ("contacts") who may have been exposed to a person with a communicable disease, such as COVID-19, to prevent further spread of the population, including the workplace.

The testing laboratory is required to report a confirmed case of COVID-19 to the local health department within 24 hours. If you have tested positive for COVID-19, you will then likely be contacted quickly by a public health professional to initiate contact tracing,^{5,6} a process in which the patient assists in creating a list of people they've been in contact with during a given time frame. For contact tracing to be most effective, it should be carried out as soon after diagnosis as possible. The contact tracing professional then contacts each of those people to help them know what steps to take:

- Follow-up may include testing and quarantine (separation of people who might have been exposed to COVID-19 from others) for unvaccinated or not fully vaccinated people, as well as monitoring for symptoms.
- Helping people diagnosed with COVID-19 get referrals for services and resources they may need to safely isolate (separation of people infected with the virus from people who are not infected).

WHAT IS A CLOSE CONTACT?

Contact tracing helps protect you, your family, and your community by:

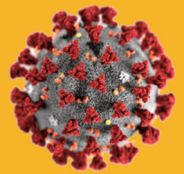
- Notifying people who have come into close contact with someone diagnosed with COVID-19 about their exposure.
 - **Close Contact is defined by proximity and duration of exposure:** Someone who was less than 6 feet away from an infected person (laboratory-confirmed or a clinical diagnosis) for a cumulative total of 15 minutes or more over a 24-hour period (for example, one 15 minute or three individual 5-minute exposures for a total of 15 minutes is close contact).
 - An infected person can spread SARS-CoV-2 starting from 2 days before they have any symptoms (or, for asymptomatic patients, two days before the positive specimen collection date), until 14 days or when they meet the criteria for ending isolation.⁷

⁴ <https://www.cdc.gov/coronavirus/2019-ncov/community/contact-tracing-nonhealthcare-workplaces.html>

⁵ <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/contact-tracing.html>

⁶ <https://www.cdc.gov/coronavirus/2019-ncov/downloads/Contact-Tracing-Infographic-FINAL.pdf>

⁷ <https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/appendix.html#contact>



CONFIDENTIALITY

During the investigation, discussions with public health workers are confidential⁸. This means that your personal and medical information will be kept private and only shared with those who may need to know, like your healthcare provider.

Suppose a manager a manager learns that an employee has COVID-19 or has symptoms associated with the disease. The manager knows they must report it but is worried about violating ADA confidentiality. What should they do?⁹

The Equal Employment Opportunity Commission (“EEOC”), which enforces the Americans with Disabilities Act (the “ADA”) and other EEO laws, addresses COVID-19-related issues affecting employers and employees in the workplace.

“The ADA does not interfere with employers following recommendations by the CDC¹⁰ or other public health authorities regarding whether, when, and for whom testing or other screening is appropriate. Testing administered by employers consistent with current CDC guidance will meet the ADA’s “business necessity” standard.” However, this must be done without revealing the employee’s identity, even if that information is not about a disability. The information that an employee has symptoms of, or a diagnosis of, COVID-19, is medical information.”

“For example, using a generic descriptor, such as telling employees that “someone at this location” or “someone on the fourth floor” has COVID-19, provides notice and does not violate the ADA’s prohibition of disclosure of confidential medical information. For small employers, coworkers might be able to figure out who the employee is, but employers in that situation are still prohibited from confirming or revealing the employee’s identity.”¹¹

The following criteria would apply to protecting medical information in the workplace:

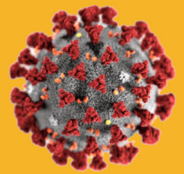
- Who in the organization needs to know the employee's identity will depend on each workplace and why a specific official needs this information?
- Employers should make every effort to limit the number of people who get to know the employee's name.
- Also, all employer officials who are designated as needing to know an employee's identity should be specifically instructed that they must maintain the confidentiality of this information.
- Employers may want to plan what supervisors and managers should do if this situation arises and determine who will be responsible for receiving information and taking the next steps.

⁸ <https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/Confidentiality-Consent.html>

⁹ https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term

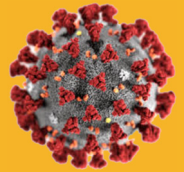
¹⁰ <https://www.cdc.gov/coronavirus/2019-ncov/community/contact-tracing-nonhealthcare-workplaces.html>

¹¹ <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>



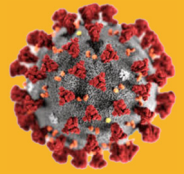
WHAT TO DO IF YOU ARE WAITING FOR A COVID-19 TEST RESULT/ OR IF YOU ARE DIAGNOSED WITH COVID-19

	If you think you may have COVID-19 and you are waiting for COVID-19 test results	If you are diagnosed with COVID-19 or have symptoms of COVID-19
Stay away from others	<p>Quarantine</p> <ul style="list-style-type: none"> Stay away from others while waiting for your COVID-19 test result, especially people who are more likely to get very sick from COVID-19, if possible. If you are unvaccinated or not fully vaccinated and have come into close contact with someone with COVID-19, stay home and away from others for 14 days after your last known exposure (quarantine). 	<p>Isolate</p> <p>Stay at home away from others (isolate), except to get medical care.</p> <ul style="list-style-type: none"> Monitor your symptoms. If you have an emergency warning sign (including trouble breathing), seek emergency medical care immediately. Stay in a separate room from other household members, if possible. Use a separate bathroom, if possible. Avoid contact with other household members and pets. Don't share personal household items, like cups, towels, and utensils. Wear a mask if you must be around other people inside and outside your household.
Think about your close contacts	<p>While you wait for your COVID-19 test result:</p> <ul style="list-style-type: none"> think about anyone you have come into close contact with starting 2 days before your symptoms began (or two days before your test if you do not have symptoms). This information can help with contact tracing efforts and help slow the spread of COVID-19 in your community. 	<p>Tell your close contacts that you have COVID-19 right away so that they can quarantine and get tested.</p> <ul style="list-style-type: none"> An infected person can spread COVID-19 starting 2 days before the person has any symptoms or tests positive. People who have COVID-19 don't always have obvious symptoms. A person is still considered a close contact even if they were wearing a mask while they were around someone with COVID-19.



What To Do If You Come in Close Contact with Someone Diagnosed with COVID-19

	If you come into close contact with someone with COVID-19 and you are unvaccinated or not fully vaccinated.	If you come into close contact with someone with COVID-19 and you are fully vaccinated.	If you come into close contact with someone with COVID-19 and you have tested positive for the virus that causes COVID-19 within the past 90 days and recovered (regardless of vaccination status).
Get Tested	<ul style="list-style-type: none"> You should get tested immediately after finding out you are a close contact. If you need help, health department staff can provide information about the best time to get a vaccine and resources for COVID-19 testing and vaccination in your area. If your test result is negative, get tested again 5-7 days after your last exposure or immediately if symptoms develop. If your test result is positive, you have COVID-19 and should isolate for 10 days. 	<ul style="list-style-type: none"> If you are fully vaccinated and become infected, you can spread the virus to others. Get tested immediately if you develop symptoms. Even if you don't have symptoms, you should get tested 5-7 days after your exposure. If you need help, health department staff can provide information about the best time to get a vaccine and resources for COVID-19 testing in your area. If your test result is positive, you have COVID-19 and should isolate for 10 days. 	<ul style="list-style-type: none"> If you develop symptoms, consult with a healthcare professional for testing recommendations.



Recording COVID-19 Cases

Work-related cases of *COVID-19 infections and deaths* identified during the investigation are required to be recorded by employers on OSHA's Form 300 logs if the following requirements are met: (1) the case is a confirmed case of COVID-19; (2) the case is work-related; and (3) the case involves one or more relevant recording criteria (e.g., medical treatment, days away from work). Employers must follow the requirements in 29 CFR part 1904 when reporting COVID-19 fatalities and hospitalizations to OSHA.

MORE INFORMATION AND RESOURCES

Contact Tracing Steps Infographic

<https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/contact-tracing-infographic.html>

How to Talk to Your Close Contacts

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/tell-your-contacts.pdf>

Contact Tracing Frequently Asked Questions and Answers

<https://www.cdc.gov/coronavirus/2019-ncov/faq.html#Contact-Tracing>

Answer the Call – Contact Tracing Video: This 1-minute animation video informs the public about contact tracing and why they should answer and respond to a call from a contact tracer.

- English: <https://www.youtube.com/watch?v=u3dLoBj3YLo>
- Español: <https://www.youtube.com/watch?v=zl1hxmPK2mA>

For concerns, questions, and information, contact the IBT Safety and Health Department at (202) 624-6960 or visit: <https://teamster.org/COVID-19>