

## Steps MPHI Will Take if An Employee Tests Positive for COVID-19

Below are steps MPHI will take upon learning that an Employee has tested positive for COVID-19 (referred to throughout this document as Employee).

1. The Employee should remain home for the period designated by the CDC, or by applicable state law. In Michigan, for example, the governor has issued an executive order that states that an employee who tests positive should remain home for (1) 24 hours have passed since the resolution of fever without the use of fever-reducing medications; (2) 10 days have passed since their symptoms first appeared or they were swabbed for the test that yielded the positive results; and (3) other symptoms have improved.
2. Immediately:
  - a. Report the positive test to the local health department. Maintain a record of this report. (Ideally, the local health department will know before the employer does and will contact the employer, but this does not always happen.) A directory of local health department contact information can be found [here](#).
3. Within 24 hours:
  - a. Provide notification (such as a letter) to any co-workers, vendors, clients, customers or visitors who ***may*** have come into ***contact*** with the Employee, to explain the situation and the precautions the Institute is taking to safely resume operations. Have discussions with employee consistent with the message in the notification.
    1. This is not a “close contact” requirement – not all of these employees need to be sent home (but see Section 7 below).
    2. ***Unless the Employee gives you permission, do not disclose Employee’s name to anyone other than authorized public officials.***
    3. Maintain a record of this notification.
4. Additional notifications:
  - a. Michigan Long-term care facilities: Report to DHHS all presumed positive COVID-19 cases in the facility.
  - b. Michigan food-selling establishments: Notify food vendors and employees within ***12 hours*** of learning that an Employee has tested positive for COVID-19.

1. A “food-selling establishment” is a grocery store, convenience store, restaurant that sells groceries or food available for takeout, and any other business that sells food.
5. Communicate with the Employee and with local health officials (if available) to identify all other employees who came in “close contact” with the Employee. Give health officials the names and contact information of the employees identified. *Unless Employee gives you permission, do not disclose Employee’s name to anyone other than the authorized public officials.*
  - a. “Close Contact” is either:
    1. Being within approximately 6 feet of a COVID-19 case for at least 15 minutes; or
    2. Having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on), while wearing no PPE.
6. Communicate with the Employee to determine whether the Employee’s illness is a *recordable* illness under Occupational Safety and Health requirements. Such a case is *recordable* when it is *work-related*. To determine *work-relatedness*, the employer should:
  - a. Ask the employee how they believe they contracted the COVID-19 illness;
  - b. While respecting the employee’s privacy, discuss the Employee’s work and out-of-work activities that may have led to exposure; and
  - c. Review the Employee’s work environment for potential COVID-19 exposure. (This review should be informed by any other instances of workers in that environment contracting COVID-19).

If *recordable*, the employer should report on OSHA Form 300 as a “respiratory illness.”

7. Inform those employees that they have come in close contact with an individual who has tested positive for COVID-19. It is appropriate to ask with whom they believe they may have been in “close contact” for 15 minutes or more, for their estimate of the last date of close contact, and for any other information they can provide about their contact with co-workers. (Remember that the employer may not disclose the Employee’s identity in these conversations without permission.)
8. Implement the Response Plan:
  - a. Send those employees who were in close contact home from work as a precaution. (If an employee insists that they did not come into close contact with

Employee, do your best to determine the facts. If the possibility of contact cannot reliably be refuted, the prudent course is to send the employee home, even if they continue to disagree.)

1. Tell the employees your best estimate of their last date of “close contact” with the Employee. Try to obtain the employee’s confirmation or correction of that date, so that employer and employee agree.
  2. Tell them that can return in 14 days from their last period of close contact with the Employee, provided that are symptom-free and have not tested positive for COVID-19 - unless health officials provide a different recommendation.
  3. Suggest that these employees contact their doctor, which should be done by phone or videoconference.
  4. HR will instruct employee on their next steps and any benefits that apply.
- b. Determine whether temporary closure of all or part of the worksite is necessary to minimize exposure and allow thorough cleaning and disinfecting.
9. Implement a protocol and conduct cleaning and disinfecting in the affected areas:
- a. Suspend operations in the areas where the Employee – or others who had close contact with the Employee – worked or spent any appreciable amount of time. This might require suspending all operations to thoroughly clean and disinfect the entire facility, if it is not clear where employee went.
  - b. Cordon off any common areas – bathrooms, breakrooms, water coolers, time clock areas, etc.
  - c. Clean and disinfect those areas, following the CDC’s guidance (found [here](#))
10. Resume operations.
- a. If any “stay-home” or “shelter-in-place” order is in effect in any state where operations continue, give employees clear and factual reminders about why the Institute is permitted to resume operations and that doing so is important to sustaining the community’s ability to continue.
11. Remind employees that they must not come to work if they are sick or exhibiting any symptoms of COVID-19 (e.g. fever, sore throat, a new uncontrolled cough that causes difficulty breathing, diarrhea, vomiting, abdominal pain, new onset of a severe headache, and new loss of taste or smell)

12. Perform screening of all employees returning to work – including taking temperatures if possible – to identify employees (a) with COVID-19 symptoms or respiratory symptoms, (b) exposure to affected individuals, or (c) exposure to individuals who have travelled to areas with high infection rates.