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 will not be allowed to return to the workplace until:

   a. Employee is no longer infectious, according to CDC guidelines.

   b. They are released from quarantine or isolation by the local public health department.

2. Immediately:

   a. Notify the local health department of the positive test. 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](#).

   b. Provide notification 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. Note: this is not a “close contact” requirement and unless the Employee gives you permission, do not disclose Employee’s name to anyone other than authorized public officials.

      2. Maintain a record of this notification.

3. 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:” The CDC defines “close contact” as either:
1. Being within approximately 6 feet of a COVID-19 case for a “prolonged period of time,” while wearing no PPE; or

2. Having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on), while wearing no PPE.

b. “Prolonged Period of Time:” MPHI defines a prolonged period of time as those who were within 6 feet of the Employee for 10 minutes or more.

4. 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.

   a. To determine work-relatedness, the employer should:

      1. Ask the employee how they believe they contracted the COVID-19 illness;

      2. While respecting the Employee’s privacy, discuss the Employee’s work and out-of-work activities that may have led to exposure; and

      3. 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).

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

5. 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 whom they believe they may have been in “close contact” with for 10 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.)

6. Implement the following Response Plan:

   a. Send those employees who were in close contact home from work as a precaution.
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 they 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 are necessary to minimize exposure and allow thorough cleaning and disinfecting.

7. **Implement the protocol for 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, and water coolers

   c. Clean and disinfect those areas, following the CDC’s guidance (found [here](#))

8. **Resume operations.**
   
   a. If any “stay-home” or “shelter-in-place” order is in effect 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.

9. **Remind employees that they must not come to work if they are sick or exhibiting any symptoms of COVID-19.**
10. 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.