

Employee Exposure to COVID-19: Contact Tracing Guidelines for Employers

The purpose of contact tracing is to identify people who have been exposed to an infectious person, and to restrict their activities in order to prevent disease spread. The exposed people are called “contacts” and they “quarantine” away from others, generally at home.

Contact, in a workplace, is defined as interacting within 6 feet of an infectious person for 15 minutes or more, without the use of a cotton mask or disposable face covering, plus either a face shield, or goggles, or a physical barrier between workstations.

Quarantine separates and restricts the movement of people who were exposed to a contagious disease to see if they become sick.

Develop a contact tracing plan

It is critical for employers and businesses to develop a COVID-19 preparedness plan that includes a protocol for quickly identifying workplace contacts of employees who worked while infectious with COVID-19. This requirement is included in Governor Tim Walz’s Executive Order 20-74.

Every contact tracing protocol must include these basic elements:

- An established point person who employees report to when they feel ill or have tested positive for COVID-19.
- A process that describes how to identify coworkers who had contact with the COVID-19-positive employee during their infectious period.
- A policy that ensures protection of an employees’ health information.
- Information and education materials, in the appropriate language, that can be given to an exposed employee about getting tested and/or when they can **return to work**.

Workplace contact tracing steps

Contact tracing should begin as soon as the employer learns that an employee tested positive for COVID-19 and worked while infectious.

The infectious period for COVID-19 starts 48 hours before someone's symptoms appear and lasts for 10 days after symptoms first appear. The infectious period for employees who test positive, but do not have symptoms, starts 48 hours before they were tested, until 10 days after the test date.

Contact tracing steps:

1. Determine the COVID-19-positive employee's activities and interactions at the facility from two days before their first symptom appeared until their last day at work.
2. Identify coworkers who meet the definition of a **contact**. Methods for identifying contacts include reviewing work and break schedules, viewing quality control or security video, assessing breakroom or locker room use, interviewing employees about carpooling, checking in with supervisors, etc.
3. Workplace supervisors require contacts to quarantine at home, according to their COVID-19 preparedness plan.
4. When the self-monitoring period is over, workplace supervisors ensure that the contacts meet all return-to-work criteria (outlined below).

Employers must respect protected health information (such as a COVID-19 test result) and follow their policies for releasing employee health information.

Quarantine guidance depends on the type of industry or business

Employees who meet the criteria for being a contact to a confirmed COVID-19 case should be asked to self-quarantine according to the guidance for the industry, which is determined by whether the industry is considered critical or non-critical.

To determine if your industry is classified as critical or non-critical, please reference State of Minnesota guidelines on [Critical Sector Worker Exemptions \(mn.gov/deed/newscenter/covid/business-exemptions/\)](https://mn.gov/deed/newscenter/covid/business-exemptions/).

Industries in non-critical infrastructure sectors

CDC guidelines, [If You Are Sick or Caring for Someone \(www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/index.html\)](https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/index.html), state that all employees who have had contact with someone who is confirmed to have COVID-19 should self-quarantine at home for 14 days since the last day of exposure.

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- If the employee develops symptoms during the 14-day quarantine period, they should be tested and should stay home to wait for test results.
- If the employee does not develop symptoms, they may return to work on day 15 without any restrictions. No medical exam or testing is necessary to return to work.
- When employees return to work, employers must resume regular screening practices and monitoring for symptoms, and continue MDH and CDC workplace mitigation practices and activities.

Note: If an employee who had contact with a COVID-19-confirmed case receives a negative test result prior to the end of the 14-day quarantine period, they must remain in quarantine until the 14-day period is over.

Industries in critical infrastructure sectors

According to CDC guidelines for [Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 \(www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html\)](https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html), employees of critical infrastructure sectors who are contacts of cases are not required to quarantine for the 14-day period if they meet all of the following criteria:

1. Their absence would create staffing shortages.
2. The employee is symptom-free.
3. The company strictly follows facility COVID-19-prevention protocols.

Allowing COVID-19-exposed employees to work increases the risk of transmission in the workplace. As a way to balance workforce needs against the risks associated with having exposed employees continue to work, the Minnesota Department of Health suggests the following options:

1. Employers observe a shortened quarantine period of 10 days for exposed staff.
 - If during the 10-day quarantine period the employee develops symptoms, they should be tested and stay home to wait for test results.
 - If the employee does not develop symptoms, they may return to work on day 11 without any restrictions. No medical exam or testing is necessary to clear these people for working.
2. Employers combine a shortened quarantine period with testing. See the following document regarding these quarantine strategies: [COVID-19 Recommendations for Critical Infrastructure Businesses and Industries \(www.health.state.mn.us/diseases/coronavirus/guidebusiessential.pdf\)](https://www.health.state.mn.us/diseases/coronavirus/guidebusiessential.pdf).

Upon returning to work, employers must continue regular screening and other mitigation practices using MDH and CDC and workplace guidelines.

MDH role in workplace contact tracing

The Minnesota Department of Health or its local public health partner conducts a case investigation for every patient who tests positive for COVID-19. As part of that investigation, cases are asked about their contacts, including those contacts within a workplace setting. However, employers can conduct contact tracing much sooner than MDH, which more efficiently limits employee exposure and worksite disruption. Additionally, it is common that employees do not know the full names or phone numbers of their coworker contacts. A joint effort between the employer and public health is the most effective way to limit spread.

Tools and resources for employers

- [Businesses and Employers: COVID-19 \(www.health.state.mn.us/diseases/coronavirus/businesses.html\)](http://www.health.state.mn.us/diseases/coronavirus/businesses.html)
- [COVID-19 Critical Infrastructure Sector Response Planning \(www.cdc.gov/coronavirus/2019-ncov/community/critical-infrastructure-sectors.html\)](http://www.cdc.gov/coronavirus/2019-ncov/community/critical-infrastructure-sectors.html)
- [For Businesses & Organizations: Stay Safe Guidance \(staysafe.mn.gov/industry-guidance/index.jsp\)](http://staysafe.mn.gov/industry-guidance/index.jsp)



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9/23/2020