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The Center for Disease Control Redefines the Phrase “Close Contact”

Please contact our
Carr Allison COVID-19 Response Team
with any questions you may have.

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The CDC recently revised the definition of “close contact” with regard to exposure to an individual who has been confirmed to have COVID-19. Close contact is now defined as “[s]omeone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.”¹ While the prior definition required contact within 6 feet of an infected individual for 15 consecutive minutes, the new definition requires contact within 6 feet for a cumulative total of 15 minutes over 24 hours.

This expanded definition significantly affects employers and how they decide who may return to the workplace and who may not. The CDC has recommended that employers not allow employees who have been in close contact with someone with COVID-19 to enter the workplace for 14 days following that contact. Employers will now be required to determine if an employee was in contact with a COVID-19 positive individual for more than a total of 15 minutes over a 24-hour period, even if those individuals weren’t experiencing symptoms at the time. This change will likely increase the number of employees who must be sent home and instructed to quarantine. The revised definition will also impact OSHA record keeping and reporting requirements for determining whether an employee’s diagnosis was work-related.

To help reduce the number of overall employees who have to be sent home to quarantine, employers should continue to follow CDC recommendations for the workplace. Some of those recommendations include the following:

Monitor Employee Health

- Tell employees who feel sick to notify their employer and stay home.
- Consider requiring employees to wear personal protective equipment while at the workplace.
- Evaluate whether taking employees’ temperature either upon initial return to work or on a daily basis would be a good practice for the particular business.

Require Good Hygiene Practices

- Require that employees wash their hands often with soap and water for at least 20 seconds.
- Consider placing hand sanitizer at multiple locations throughout the workplace to encourage frequent use.
- Tell employees not to use another worker’s desk, workspace, telephone, computer or other work-related tools.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/appendix.html#contact>

Ensure Physical Distancing

- Allow employees to work from home, if possible.
- Ensure that employees have adequate space to work at least 6 feet from anyone else while at the workplace and instruct them to maintain that distance at all times.
- Eliminate in-person meetings. Instruct employees to communicate by email or telephone instead.
- Stagger work shifts and breaks to reduce the number of employees at the workplace or in one particular location at any given time.
- Eliminate all non-essential work-related travel.
- Cancel any remaining work-sponsored conferences or other large gatherings for the foreseeable future.

Implement Environmental Controls

- Frequently disinfect all common workspace surfaces and objects that workers must touch.
- Provide cleaning supplies so employees can sanitize their individual workspace before each shift.
- Limit the number of employees that may touch or come in contact with frequently used equipment or tools.
- Remove or limit the usage of common items such as dishes, coffee pots, drink machines, microwaves and refrigerators.
- If employees must frequently come in contact with customers, consider installing clear shields, such as plexiglass, between them.

We will continue to keep you informed about changes with regard to employment laws and COVID-19. If you have any questions or need assistance, please do not hesitate to let us know.