Staff COVID-19 Diagnosis Guidance

When someone tests positive for COVID-19, contact tracing and notification of exposed individuals are key factors in containing further spread of the disease.

However, this presents complications in complying with ADA’s requirement that employers keep employee medical information confidential. Specifically, due to the one-on-one nature of some service deliveries, informing a client that they were exposed by an employee would allow them to identify the individual in question and therefore be cognizant of their case worker’s medical information.

The Allegheny County Health Department (ACHD) has an established process of informing individuals about their exposure to an infected individual using a team of contact tracers. They minimize risk of identifying the infected individual by only providing information about the date of exposure and guidance on how to quarantine safely. Allegheny County recommends using this process to inform clients.

This document outlines ACDHS’s suggested procedure to follow if/when a staff member tests positive for COVID-19.

What should a staff member do if they are getting tested for COVID-19?
If someone is awaiting test results, they need to stay home.
If their test results come back positive, they need to isolate for at least 10 days, beginning with the day of symptom onset.

What does the contact tracing process look like?
All COVID-19 test results are reported into the state disease surveillance system, and positive test results trigger a public health case investigation.
When a staff member tests positive for COVID-19, they should be aware that the health department (ACHD or PA Department of Health) will contact them to complete this case investigation.
As part of the case investigation, the COVID-positive individual will be asked for a list of close contacts (clients, coworkers, family, friends, etc.). Being prepared with this list of
people and their respective contact information will facilitate the investigation.

The case investigator will give the list of contacts to the team of contact tracers, who will call the exposed individuals. The goals of contacting exposed individuals are to 1) inform them of the fact that they were exposed and the date of this exposure, and 2) provide guidance for quarantining safely.

**What defines a “contact”?**

When a person who has been diagnosed with COVID-19 is in the presence of another person (regardless of whether either person was wearing a mask at the time of contact) with the following conditions:

- **When**: The contact occurred up to 48 hours before the onset of symptoms or after the diagnosed individual became symptomatic.
- **Distance**: The diagnosed individual was within 6 feet of the other person.
- **Length of time**: The contact happened for 15 minutes or more.

**When contacted by the contact tracer, what information will the COVID-positive staff member need to provide about their “contacts”?**

- Name
- Phone number or email
- Date of exposure to that person
- Whether the exposure is ongoing (i.e. household member with constant exposure versus a friend who was exposed once at a gathering)

**What if a staff member is identified as a contact (i.e. had in-person contact with a positive client that meets the above criteria)?**

That staff member would need to quarantine for 14 from the date of exposure. However, nobody that the exposed staff member was in contact with is considered a contact (they are considered contacts of a contact and therefore do not need to take any action).

*Please note: This document outlines the minimum level of action to be taken if a staff member tests positive for COVID-19. However, DHS has yet to find definitive guidance about how to reconcile the requirements of the ADA with our commitment to client safety, specifically a desire to notify clients as soon as possible about their interaction with a COVID-positive individual. You may choose to pursue more immediate methods of notification to those individuals, but any actions beyond what is described above, especially additional levels of notification, should be at the discretion/direction of your individual organization’s legal and leadership teams.*