

# Coronavirus Disease 2019 (COVID-19)



## Case Investigation and Contact Tracing in Non-healthcare Workplaces: Information for Employers

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### Printable Resources

[Tips for Employers to Assist Health Departments](#)  [1 page]

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CDC encourages employers to collaborate with health departments when investigating workplace exposures to infectious diseases, including COVID-19. Quick and coordinated actions, including case investigation and contact tracing, may lower the need for business closures to prevent the spread of the disease.

Employers' involvement with the official health department case investigation or contact tracing process may vary. It will depend on the authorities, responsibilities, and capacities of their health departments; federal, state, and local laws and regulations; and the level of interest and capacity of the employer. Employers may consult with their company's human resources, legal, medical, and occupational safety and health guidance, policy and other resources to help them develop and implement their COVID-19 preparedness, response, and control plan.

CDC's [Coronavirus Disease 2019 \(COVID-19\) Businesses and Workplaces](#) webpage provides information to help businesses [limit the spread of COVID-19 within the workplace](#). This document provides tips and considerations for how employers can partner with state, tribal, local, or territorial (STLT) health departments and work with their employees in these COVID-19 response efforts.

# What employers should know about COVID-19 case investigation and contact tracing

COVID-19 is a [nationally notifiable disease](#) , and when diagnosed or identified, must be reported by healthcare providers and laboratories to STLT health departments. Health departments are responsible for leading case investigations, contact tracing, and outbreak investigations. Case investigation is the identification and investigation of individuals with confirmed and probable diagnoses of a reportable communicable disease, such as COVID-19. Contact tracing follows case investigation and is a process to identify, monitor, and support individuals who may have been exposed to a person with a communicable disease, such as COVID-19. Health departments also administer communicable disease control measures within their jurisdictions to protect public health. This includes working with patients and contacts on [isolation](#) (separation of people infected with the virus from people who are not infected) and [quarantine](#) (separation of people who might have been exposed to COVID-19 from others). Given the large number of COVID-19 cases reported to health departments, coupled with how easily and quickly the virus is spreading, health department resources can be overwhelmed. When requested by the health department, employer assistance may aid in limiting the spread of the COVID-19 in the work environment.

## Employer involvement

When health department personnel investigate a case, they will ask the patient questions about work status and work environment, about persons they have been in close contact with, and locations visited during the time they could have spread COVID-19 to others. If the health department learns a person is a [confirmed or probable case of COVID-19](#) and was in a workplace where close contact with others (employees, customers, or community members) may have occurred, the health department may contact the employer, employees, or customers to let them know of potential exposures. Confidential information about the infected individual, including their name and other personal identifying information, will be safeguarded and not be revealed without their permission. Employers can assist the health department by providing further identification of potential contacts who worked in the same area and on the same shift, hosting a site visit for health department personnel to observe the workplace in order to make workplace-operation recommendations to help prevent further spread of the virus, and facilitating communication with employees.

The level of interaction between the health department and an employer will vary depending on several factors, such as the size and type of workplace, the number of cases impacting the workplace, the health department's capacity, and local, state, and federal laws and regulations.

In general, when a COVID-19 case is identified that impacts a workplace, the health department may ask the employer for help in a number of ways, including:

- **Ask the employer for help in understanding the risk for transmission in the workplace and identifying exposures and contacts in the workplace.** This may include health department-initiated interviews, site visits, and record reviews to identify close contacts who may have been exposed to the virus better understand

risks for transmission within the workplace (e.g., barriers to social distancing or use of cloth face coverings).

- **Rely on the employer to identify workplace contacts.** While this is not typical, some health departments have or may initiate agreements with employers with occupational health or medical programs or trained occupational safety and health staff who are able to formally and confidentially carry out some aspects of contact tracing in the workplace. In such situations, to protect employees' privacy, health departments will take responsibility for case investigation and contact tracing outside of the workplace. If employers are interested in this type of agreement, they should contact their health department in advance to discuss the possibility and details of this option.
- **Conduct workplace contact tracing without directly engaging the employer.** The health department may decide they do not need assistance or information from the employer because the risk of further workplace transmission is low. Another reason is the health department may not have the resources to follow up with the employer. They also may not be permitted to involve an employer because local or state privacy laws may limit third-party involvement in contact tracing without the case patient's consent.

## Preparing to collaborate with the health department

What employers can do to assist in the response to COVID-19:

- Establish a COVID-19 coordinator or team. Employers may find it useful to identify a coordinator or a team to oversee COVID-19 related activities. The COVID-19 coordinator/team should serve as a resource to the health department and the workplace as the primary point of contact for coordinating all COVID-19 activities. The COVID-19 coordinator/team should help to develop and put into action the hazard assessment activities discussed below.

The COVID-19 coordinator/team can review CDC's [Coronavirus Disease 2019 \(COVID-19\) Contact Tracing](#) guidance to better prepare and understand these processes. The COVID-19 coordinator/team can also visit the [STLT health department website](#) to see if specific local information for employers is available. Some jurisdictions have [state-based occupational health and safety surveillance programs](#) that may be able to assist.

While the employer's COVID-19 coordinator/team can aid the health department when requested to carry out some contact tracing activities among their employees, they do not have the authorities to perform all aspects of these functions without consultation with the health department. For instance, employers can limit entry into the workplace by employees based on the employer's fitness-for-duty policies, but employers cannot ask about workers' activities or contacts outside of work.

- **Create and implement a preparedness, response, and control plan.** Employers can use the guidance from CDC's [Coronavirus Disease 2019 \(COVID-19\) Businesses and Workplaces](#) web page to create a COVID-19 preparedness, response, and control plan. Making this plan will help employers evaluate the risk and decide on actions to prevent the spread of COVID-19 in the workplace. Having the plan will

also allow employers to rapidly gather employee and workplace records, when needed, to assist possible health department-initiated case investigations and contact tracing. The employer may also decide to distribute this plan throughout their business.

- **Collect information about the workplace.** One of the most useful things an employer can do is to prepare and quickly provide information and records to the health department about the workplace, potential workplace contacts, and, when needed, workplace operations, without revealing confidential personnel records or business information. Examples of useful information to have on hand can be found in the [Interim Customizable Non-Healthcare Workplace Infection Control Assessment and Response \(WICAR\) tool — Coronavirus disease 2019 \(COVID-19\)](#).

Note that all activities and information collected by an employer should be limited to the work setting and be consistent with applicable local, state, and federal privacy, health/medical, and workplace laws and regulations (e.g., [U.S. Equal Employment Opportunity Commission \(EEOC\)](#) [↗](#) and [Americans with Disabilities Act \(ADA\)](#) [↗](#) ).

The [Occupational Safety and Health Administration's \(OSHA\) interim guidance](#) [↗](#) outlines employer requirements with respect to the recording of occupational illnesses, specifically cases of COVID-19. Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus employers are responsible for recording cases of COVID-19, if the case meets certain requirements. Employers are encouraged to frequently check [OSHA's COVID-19 webpage](#) [↗](#) for updates.

- **Support employees and conduct workplace hazard evaluation and prevention activities.** As noted in the [CDC Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 \(COVID-19\), May 2020](#), employers must provide a [safe and healthy workplace](#) [↗](#) free from known hazards that are likely to cause death or serious physical harm. If an employee, customer, or a visitor in the workplace has [symptoms consistent with COVID-19](#), self-reports a COVID-19 diagnosis, or close contact with someone with confirmed or probable COVID-19, an employer should quickly take action by conducting workplace hazard evaluation and prevention activities. These actions will help limit the spread of COVID-19 in the workplace.

COVID-19 is a new hazard in the workplace, employers should also consider carrying out relevant [hazard assessment](#) [↗](#) that can help identify potential hazards related to COVID-19. Employers should then use proper [hierarchy of controls](#) methods to limit the spread of COVID-19 in the workplace setting.

- **Communicate with employees.** Employers should inform employees that the health department will contact persons diagnosed with COVID-19 or those in close contact with someone testing positive for COVID-19. Employers should encourage employees to work with the health department to discuss their illness, exposures, and contacts so the health department can limit further spread of COVID-19.

If employers are notified of a case of or exposure to COVID-19, they must adhere to workplace and medical privacy laws and protections. Employers should also tell employees that when the health department notifies people who were exposed in the workplace (contacts), they will only share that they may have been exposed to COVID-19; they will not share names or any personal or medical information of the case with contacts. The health department will offer recommendations for testing

and quarantine based on that exposure.

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