

Employee Exposure to COVID-19

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Purpose: To educate National Apartment Association (NAA) members about the considerations for addressing a positive test for COVID-19 among their workforces.

Applies to: All NAA members who are involved in employee relations.

Overview: As employers reopen their workplaces and employees return to the office, companies should have a plan in place that outlines steps to take addressing suspected or confirmed cases of COVID-19 among staff.

Employers should attempt to conduct company assessments to identify risks and prevention strategies prior to confirmation of COVID-19 exposure or a positive diagnosis. Employers should identify a qualified workplace coordinator who will be responsible for COVID-19 issues, help develop plans for implementing infection control procedures and help assess the impact of COVID-19 on the workplace, including absenteeism at work. Basic infection control information and training should be provided for all workers in all needed languages and in a manner that is easy to comprehend.

It is important to recognize that NAA, its affiliates and individual members are not health care professionals. The Centers for Disease Control and Prevention (CDC) and other qualified health officials should continue to be the primary source of information and guidance. For further information, consult the CDC [Interim Guidance for Business and Employers to Plan and Respond to Coronavirus Disease 2019](#) and [General Business Frequently Asked Questions](#), which are frequently updated, and the Occupational Safety and Health Administration (OSHA) [Guidance on Preparing Workplaces for COVID-19](#) and [Guidance on Returning to Work](#). See also the Federal Government Resources section at the end of this document.

Guidance:

1. **Confirmed Case** — When dealing with a confirmed case of COVID-19, it is important to avoid panicking. Begin by easing the concerns and fears expressed by residents and staff members alike. During this process, effective communication is key. Your company should provide easy-to-access and readily available resources. Because of the nature of the COVID-19 pandemic, information is

rapidly changing. It is recommended to stay tuned to the CDC for active updates and guidance as new information is learned and distributed. Make it a priority to educate both staff and residents on the virus and ways to limit exposure. Your company and/or property should have a preparedness plan for immediate action. In this plan, make sure to address business continuity should essential employees become sick.

- 2. Monitoring Employees** — Managers should educate employees in how to recognize the symptoms of COVID-19. Employees should be provided with instructions on what to do if they develop symptoms within 14 days after their last possible exposure to the virus. Companies should have a policy in place for employee protection and provide training to all staff to include proper cleaning, when to use personal protective equipment (PPE), how to properly apply and remove PPE and proper disposal.

Ask all employees to monitor their own health and encourage anyone who exhibits symptoms of COVID-19 to stay home. Ask an employee who calls in sick whether they are experiencing COVID-19 symptoms (e.g., fever, chills, cough, shortness of breath, sore throat).

- 3. Sick Employees** — If an employee develops symptoms upon arriving at work or becomes sick during the day, they should immediately notify their supervisor. The employee should quickly be separated from other employees, visitors and residents and should prepare to leave as soon as possible. The employee should preferably be located in a room or area that can be isolated behind a closed door, and asked to avoid touch with people, surfaces or objects. Assist the employee in making arrangements to leave the workplace, minimizing potential contact with others, and provide [CDC guidance on managing COVID-19 symptoms at home](#). If an employee develops symptoms outside of work or prior to arrival at work, they should also immediately contact their supervisor and plan to not come to the community/office.

Staff members who are not feeling well should remain in isolation or in quarantine and adhere to the most recent CDC guidelines and the advice of their healthcare provider. Staff members should not return to work until they have met the criteria to [discontinue home isolation](#) and have consulted with a healthcare provider. Per the CDC, “[e]mployers should not require sick employees to provide a COVID-19 test result or healthcare provider’s note to validate their illness, qualify for sick leave, or return to work. Healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner.”

- 4. Isolation vs. Quarantine** — Isolation means the separation of a person or group of people known or reasonably believed to be *infected with a communicable disease and potentially infectious* from those who are not infected to prevent spread of the communicable disease. Isolation for public health purposes may be voluntary or compelled by federal, state or local public health order. Quarantine, in general, means the separation of a person or group of people reasonably believed to have been *exposed to a communicable disease but not yet symptomatic* from others who have not been so exposed, to prevent the possible spread of the communicable disease. The correct terminology as outlined by the CDC should be used when communicating with employees and residents.
- 5. Maintenance** — Frequently clean and disinfect high-touch surfaces daily in common areas (e.g., tables, hard-backed chairs, doorknobs, light switches, remotes, handles, desks, toilets, sinks, handrails) using a product from the [Environmental Protection Agency’s \(EPA\) approved COVID-19 disinfectant list](#). For community common and amenity areas, consider limiting hours or a complete closure of amenities. If not possible, consider limiting the number of individuals using the amenity at any one time, and always practice social distancing.

For maintenance requests, determine what constitutes an emergency during this time and ensure all employees understand this standard. Have an established protocol in place for your maintenance team. When possible, postpone non-emergency requests and communicate any changes in your existing maintenance procedures to all residents. For more information on maintenance protocol related to COVID-19, please see the NAA's micro-webinar [Maintenance During COVID-19: Protecting Residents and Ourselves](#).

6. **Employee Exposure** — The CDC says an employee may have been exposed if they are in close contact' (fewer than 6 feet) with someone who is infected with COVID-19 for a prolonged period of time (15 minutes or more). It's also important to understand that the timeframe for having contact with an individual includes the 48 hours prior to the onset of illness, and for asymptomatic patients, 48 hours prior to specimen collection.

If employee is potentially exposed and has symptoms of COVID-19:

- Self-isolate at home (away from others if possible; separate room/bathroom)
- Contact a healthcare provider
- Avoid public transportation
- Monitor symptoms
- Wear a cloth covering over mouth and nose
- Follow CDC guidelines for cleaning and disinfecting

If employee is potentially exposed and does not have symptoms of COVID-19:

- Remain at home or in a comparable setting
- Practice social distancing for 14 days

If employee is not exposed:

- Self-monitor for COVID-19 symptoms
- Wear cloth face coverings when in public
- If symptoms develop, notify the supervisor and return and stay home

7. **Disinfecting After Exposure** – Disinfecting your facility is important, especially after potential exposure or a confirmed case of COVID-19. Perform enhanced cleaning and disinfection after anyone suspected or confirmed to have COVID-19 has been in the workplace. According to the CDC, most facilities will not need to close. However, the CDC recommends that you close off any areas used for a prolonged period of time by the sick staff member.

Clean and disinfect according to CDC guidelines, including waiting 24 hours before cleaning and disinfecting to minimize potential exposure to respiratory droplets by other employees. If waiting 24 hours is not feasible, wait as long as possible. Open outside doors and windows to increase air circulation in the area. Clean and disinfect all areas used by the sick person(s) such as offices, bathrooms, common areas, shared electronic equipment like tablets, touchscreens, keyboards, thermostats, key management systems, telephones and remote controls. The CDC also recommends wearing disposable gloves and gowns for all tasks in the cleaning process, including handling trash. Additional PPE might be required based on the cleaning/disinfectant products being used and whether there is a splash risk. Gloves and gowns should be carefully removed to avoid contamination of the wearer and the surrounding area. All employees should wash their hands often with soap and water for a minimum of 20 seconds. If soap and water are not available, hand sanitizer should be used.

8. **Employee Communication: Do You Have a Duty to Notify Other Employees if a Staff Member Contracts COVID-19?** — Employers have a general duty to provide a safe workplace under state (if applicable) and federal OSHA laws and regulations. The CDC advises employers to notify fellow

employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). Under the ADA and other privacy laws, employers are prohibited from disclosing the personal information, including the name, of the affected employee. Consult your local counsel and legal team if you have any questions or concerns. In addition, the following steps should be taken:

- Employers should conduct contact tracing if possible to determine employees who were exposed.
- Use affected employee's work schedule to determine other employees who were working during the same shift and to also determine any potential close contact.
- Ask affected employee with whom they had close contact during the previous 14 days. Immediate consideration should be given to any employees and residents who may be affected, especially if among those listed are a maintenance team member or an employee who is resident-facing.
- Consideration should be made for all other encounters with office visitors to include potential residents, delivery drivers, suppliers and contractors.
- Ask affected employee which common areas/offices they used. This will assist with prioritizing cleaning efforts.

9. Resident Communication: Do You Have a Duty to Notify Residents if a Staff Member Contracts COVID-19?

— Whether you have a legal duty to notify residents that an onsite staff member has tested positive for COVID-19 varies by state/jurisdiction. Unfortunately, there is no clear answer, and many factors come into play. For starters, review state and local mandates (e.g., District of Columbia has specific Phase II interim guidance for Apartments, Condos and Co-Ops). Review the terms of lease contracts with your residents. Discuss with counsel whether notification should become a best practice, for health and safety concerns, and to avoid future liability claims. Under the ADA and other privacy laws, employers are prohibited from disclosing the personal information, including the name, of the affected employee to residents. If you decide to notify residents, employers should do their best to notify all residents who may have had contact with the affected employee. As always, consult your local counsel and legal teams to discuss COVID-19's impact on contractual obligations and business operations at your communities.

10. Written Communication to Employees and Residents – Ensure any communications go to all residents/staff members and include the date on the notification. Examples of acceptable communication methods include letters, emails and community bulletin posts. Inform residents/staff members that the affected employee(s) has been advised to follow the guidance of local health officials and CDC, including observing an isolation period.

Inform residents/staff members of the employee's prior whereabouts on the property. Remind residents/staff members to continue to protect themselves and avoid touching their eyes, nose and mouth with unwashed hands. Continue to wash hands according to CDC guidelines, wear a face covering/mask and utilize appropriate PPE. Ensure residents/staff members that you are doing your part to clean and disinfect per CDC guidelines. Please refer to the resident notification letter following this document that may be used as a template for communication.

Related Links and Forms

Resident Notification Letter

[Cleaning and Disinfecting Your Facility](#)

Suspected or Confirmed Cases of COVID-19 in the Workplace

About NAA

The National Apartment Association (NAA) serves as the leading voice and preeminent resource through advocacy, education and collaboration on behalf of the rental housing industry. As a federation of 152 state and local affiliates, NAA encompasses over 82,000 members representing more than 10 million apartment homes globally. NAA believes that rental housing is a valuable partner in every community that emphasizes integrity, accountability, collaboration, community responsibility, inclusivity and innovation. NAA thanks its strategic partners Lowe's Pro Maintenance Supply Headquarters and Yardi. To learn more, visit www.naahq.org.