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**COVID-19 Testing Requirements, Exposure Evaluation and Reporting, Risk Assessment, Contact Tracing, and Return to Work Guidelines for Healthcare Workers (HCWs)**

This policy outlines the testing requirements and exposure evaluation and reporting process for HCWs, department managers, Infection Prevention (IP), and Employee Health Department (EH or Employee Health) relating to COVID-19. This policy applies to any Healthcare Worker, defined as any employee, volunteer, staff, physician, contract personnel, or other individual working in the Hospitals and Clinics regardless of job duty (HCWs). Exposures for HCWs or County employees who do not currently work at the Hospitals and Clinics (e.g., they work for another County department, or they are assigned by County Emergency Operations Center to work at another location) will be reported to the appropriate department representative where that HCW/employee currently works for further review and follow up. For purposes of this policy, all persons who work at the COVID-19 community testing and vaccination sites established by the County Health System, including the Santa Clara County Public Health Department (SCCPHD), are considered HCWs currently working at the Hospitals and Clinics.

See Facility's Aerosol Disease Transmission Plan (ADT) from the Infection Prevention Department and County of Santa Clara guidelines for compliance with Cal/OSHA's Emergency Temporary Standards (ETS) (relating to employees that are not subject to the ADT) for additional requirements for occupational exposures.

**COVID-19 VACCINATION STATUS AND REQUIREMENTS**

- All HCWS must be either fully vaccinated (14 days past final dose in a vaccination series) or have an approved medical, disability, or religious exemption that allows them to work in their current position. High risk positions require full vaccination regardless of exemption status.
- Managers may not allow anyone to work in their department without COVID-19 vaccination documentation and clearance from Employee Health.
- Employee Health shall ensure that all COVID-19 vaccination or exemption requirements are appropriately completed and documented in ReadySet (or equivalent employee health record utilized by Employee Health) before clearing any HCW to work, including, but not limited to, new hires, transfers from other departments, returning from leave, medical staff, contractors, volunteers, students, and employees.
- If there are any deficiencies or delays in documentation or verification of COVID-19 vaccination or exemption requirements, Employee Health shall communicate with the appropriate hiring manager, supervisor, or recruiter.

**COVID-19 TESTING FOR HCWs**

Employee Health will provide COVID-19 testing to HCWs in the following circumstances. HCWs who are asymptomatic and have had a positive COVID-19 test within the prior 90 calendar days should not test until at least 90 calendar days have passed from the date the positive COVID-19 test was resulted.

1. **HCW has any symptoms of COVID-19.** COVID-19 symptoms include the following:
  - Fever (100.0°F) or chills
  - Cough or congestion
  - Loss of taste or smell
  - Sore throat (new or unexplained)
  - Fatigue (new or unexplained)
  - Shortness of breath or difficulty breathing
  - Muscle or body aches (new or unexplained)
  - Headache (new or unexplained)
  - Nausea, diarrhea, or vomiting (new or unexplained)

2. **HCW has been granted a medical, disability, or religious exemption (including provisional approval) from COVID-19 vaccination requirement that allows them to work in their current position** and is required by the County to obtain and report results of a weekly or twice-weekly PCR test for COVID-19, the frequency of which is indicated in the exemption approval letter provided to the HCW (including those who have completed or partially completed their vaccination series but are still in the window to become fully vaccinated. "Fully vaccinated" means that a person has received, at least 14 days prior, either the second dose in a two-dose COVID-19 vaccine series or one dose in a single dose COVID-19 vaccine and has uploaded that information into ReadySet or equivalent Employee Health record).
3. **HCWs who are "close contacts" of a COVID-19 case or have been exposed to COVID-19** and are required or recommended to receive a COVID-19 test per this policy or County policy.

#### **NOTIFICATION OF COVID -19 TEST RESULTS**

- For all the HCWs who get tested for COVID -19 by EH, the results can be accessed in ReadySet and in MyHealth Online (for employees who opt to use MyHealth Online).
- For negative results, Employee Health will not call the HCW. The test result will be placed in ReadySet for HCW to directly access and review test result.
- For positive results, Employee Health will contact the HCW to discuss the result and recommended quarantine or isolation duration, along with follow up plan. A follow up PCR test is required to confirm any positive antigen test result.
- It is the responsibility of the HCW to ensure that accurate contact information is contained in ReadySet and confirmed during testing. Failure to update contact information may result in delay of notification of testing results by EH.
- All asymptomatic HCWs who receive testing pursuant to this policy (except those who are not fully vaccinated and have been exposed to a COVID-19 positive case) may continue to work pending test results and following a negative RT-PCR or antigen result, as long as they follow all current PPE, respiratory, symptom monitoring, and hand hygiene guidelines.
- Any HCW who becomes symptomatic may not come to work and must follow current HCW screening and exposure guidelines, including those outlined in this policy.

#### **HCWs WHO HAVE COVID-19 SYMPTOMS**

Regardless of whether they have been fully vaccinated for COVID-19, all symptomatic HCWs must:

- Immediately notify their manager and Employee Health if they have any COVID-19 symptoms as noted above.
- Do not come to work. If at work, leave immediately or wait outside for transportation home (preferably avoiding public transportation).
- Do not return to work until cleared to do so by Employee Health consistent with this policy.
- Wear surgical mask, or N95 if available, including on the trip home.
- Quickly collect belongings to bring home to avoid others touching personal belongings that may be contaminated.
- Maintain at least 6 feet distance from all other individuals.
- Immediately obtain testing for COVID-19 through Employee Health (call to set up appointment, do not go to walk-in swabbing location), their own provider, or other testing site. If not tested by Employee Health, report the test results to Employee Health within one business day.
- If currently working at other County sites, alert supervisors at those other sites of the need to stay home until further notice. If the symptomatic HCW is well enough to work from home and approved by their department to work from home, they can coordinate with their supervisor for appropriate assignment.

- Quarantine/isolate in compliance with the Public Health Department's [Home Isolation and Quarantine Guidelines](#), or any other applicable guidance provided by the Public Health Department.
- Call 9-1-1 or follow usual procedures to request emergency medical evaluation and treatment if experiencing or witnessing severe or life-threatening symptoms.
- Managers shall ensure that the work areas that the symptomatic individual spent time in and surfaces that the individual may have come in contact with or coughed on during the prior 24 hours (*e.g.*, workstation, armchairs, doorknobs, equipment, and office supplies) are cleaned pursuant to EVS protocols.

#### **HCWs WHO HAVE POSITIVE COVID-19 TEST**

Regardless of whether they are fully vaccinated, all HCWs must do the following upon learning that they have a COVID-19 positive test result:

- Immediately report the COVID-19 positive test result to their manager and Employee Health.
- For a COVID-19 test to be considered positive, all tests must be performed by Employee Health, or at another healthcare facility or testing site, and the results provided to Employee Health.
  - a. If HCW is symptomatic, a positive COVID-19 PCR or antigen test is considered positive.
  - b. If HCW is asymptomatic, a positive COVID-19 PCR is considered positive. A positive COVID-19 antigen test must be confirmed by a positive COVID-19 PCR test within 24 hours of antigen test. HCW should be excluded from work and isolate until PCR results return. If the PCR test is unable to be obtained within 24 hours of antigen test, the positive antigen test can be considered a true positive.
- If a HCW is symptomatic, and tests positive or negative with a home COVID-19 test (self-collection test or self-kit), a follow-up confirmation test must be performed with their healthcare facility or EH. The HCW must continue to quarantine after the home COVID-19 test, and then contact EH or their healthcare facility for testing. While the repeat test is in process, the HCW must remain at home pending further instructions from EH.
- If a HCW is asymptomatic and tests positive with a home COVID-19 test (self-collection test or self-kit), a follow up confirmation test must be performed with their healthcare facility or EH. The HCW must quarantine after the home COVID-19 test, and then contact EH or their healthcare facility for testing. While the repeat test is in process, the HCW must remain at home pending further instructions from EH.
- All HCWs are expected to cooperate with and follow the instructions by EH and their manager with respect to identifying close contacts and exposure risks in the workplace and return to work criteria.

#### **HCWs WHO ARE EXPOSED TO COVID-19 CASES**

- HCWs shall immediately report to their manager and Employee Health if they learn they are a "close contact" of an individual who has tested positive for COVID-19, as defined below.
- HCWs who are fully vaccinated and have been asymptomatic since their last exposure to a COVID-19 case are not required to report that they are a close contact to a case, nor are they required to quarantine. However, they are required to obtain COVID-19 testing as are all other close contacts of the COVID-19 case.
- HCWs who: (1) are not fully vaccinated and are a close contact to a COVID-19 case, or (2) a symptomatic close contact to a COVID-19 case (regardless of vaccination status), must isolate or quarantine, as appropriate, in compliance with the Public Health Department's [Home Isolation and Quarantine Guidelines](#), or any other applicable guidance provided by the Public Health Department.
- Additionally, all close contacts, regardless of vaccination status, must get tested after exposure to a COVID-19 case unless the close contact themselves had COVID-19 within the previous 90 days and has not

had any new symptoms since their recent exposure to the COVID-19 case. The Public Health Department recommends that close contacts be tested immediately after exposure to the COVID-19 case and then again on or after Day 5 or later from their last exposure to the COVID-19 case. All close contacts, including those who previously had COVID-19 and including those who are fully vaccinated, must immediately self-isolate and get tested if they develop symptoms in the 14 days following their last exposure to the COVID-19 case.

## **MANAGER RESPONSIBILITIES RELATING TO COVID-19 EXPOSURES**

- I. **Identify Exposures:** In the event there is a reported COVID-19 case, the department manager will interview the COVID-19 positive HCW (in consultation with IP as appropriate) and obtain the following information:
1. Confirm presence of COVID-19 source. Identify and confirm all HCWs that meet exposure parameters noted below (Exposed HCWs)
    - a. **Distance and time parameters (close contact):** Contact distance less than six feet of COVID-19 positive source for a cumulative total of 15 minutes or more in any 24-hour period. Any duration of exposure within any 24-hour period should be considered prolonged if the exposure occurs during performance of an aerosol generating procedure (AGP).
    - b. **Period of Exposure (infectivity period):**
      - a. Symptomatic COVID-19 source: 48 hours prior to symptom onset until the time the source is isolated, e.g. last day of work.
      - b. Asymptomatic COVID-19 source: 48 hours prior to collection date of the source's first positive test until the time the source is isolated, e.g., last day of work.
  2. Determine and document PPE use of both COVID-19 source and each HCW identified during the infectivity period, e.g., utilization of mask and eye protection. The PPE documentation is NOT used to determine whether someone is considered a close contact or has been exposed to a COVID-19 case. It will only be used to determine level of risk of infection and compliance with PPE guidelines.
  3. Identify and confirm all patients who meet exposure parameters (exposed patients). Determine and document PPE use of both COVID-19 source and exposed individuals.

## **II. Identify and Notify Employee, Exposed HCWs and Unions and Refer to Employee Health**

1. **If COVID-19+ source is a HCW in the Hospitals and Clinics**
  - a. Manager will identify exposed HCWs and patients if the COVID-19+ source is another HCW. The department manager will complete a **COVID-19 Positive Case and Community Exposure Close Contact Information Form ("Exposure Information Form")**, which can be obtained from Employee Health or as posted on the [Hub](#), and return to EH no later than 5:00 p.m. the next business day after receiving notification of the COVID-19+ HCW.
  - b. **The form will also be sent to IP no later than 5:00 p.m. the next business day if patient exposures are present or potentially present.**
  - c. All Exposed HCWs must be listed on the Exposure Information Form. Any HCW who is not on the Exposure Information Form will be referred back to their manager for further review if they contact EH. If upon further review, a HCW needs to be added to the Exposure Information Form, the manager will resubmit the Exposure Information Form with additional names.

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- d. On or about the same time as the Exposure Information Form is provided to Employee Health, **but no later than the next business day following notification of COVID-19 positive HCW**, the manager will immediately do the following:
- i. Notify COVID-19 HCW using template form. (Attachment B, Appendix 2).
  - ii. Notify all HCWs listed on the Exposure Notification Form and their labor unions (as required by Cal/OSHA regulations) by using the template form (Attachment B, Appendix 3). This **template notification to exposed HCW shall advise the HCW to contact EH for follow up.**
  - iii. **It is the responsibility of the exposed HCWs to contact employee EH to seek follow up and proceed with EH advice.**
  - iv. Notify entire unit/department and their labor union by using the template form (Attachment B, Appendix 4).
  - v. Note: When filling out the Exposure Information Form and sending notice to HCWs, include all possible exposure locations, including the work location, working area, or common area used or accessed by the COVID-19 case during the infectious period, including bathrooms, break or eating areas, and waiting areas, as well as walkways, hallways, and aisles if the COVID-19 case congregated with others in that space.
- 2. If COVID-19+ source is a patient in the Hospitals and Clinics**
- a. If COVID-19+ source is a patient in the Hospitals and Clinics and HCW who provided care for that patient expresses concerns for exposure, the manager in consultation with IP as appropriate will determine potential exposure and provide names of the HCWs who may have been exposed using the Exposure Information Form to Employee Health for follow up and testing in accordance with the testing provisions of this policy.
  - b. Any HCW who is not on the Exposure Information Form will be referred back to their manager if they contact EH. If HCW needs to be added to the Exposure Information Form, the manager will resubmit the Exposure Information Form with additional names.
- 3. If COVID-19+ source is identifiable household member or a person in the community**
- a. If the COVID-19+ source is an identifiable person in the community (e.g., family member) and HCW has concerns for exposure to that individual due to being a close contact of that individual, the HCW must notify their manager.
  - b. The manager will determine exposure risk using criteria above and complete and provide an Exposure Information Form to Employee Health.
  - c. The manager may contact Employee Health for guidance if necessary. However, if the HCW contacts Employee Health, Employee Health will assist the manager with completing the Exposure Information Form.
  - d. If a HCW reports an exposure to a COVID-19+ source in the household or community more than once every 30 days, their case will be discussed with the Hospital Command Center.
  - e. When there is close contact with a COVID+ source outside of work (household and community), it is considered a high-risk exposure because the probability of both individuals not wearing appropriate PPE during interactions is high. Note that all

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household members are considered close contacts regardless of distance parameters and masking. See return to work criteria below.

**III. Evaluate if Cal/OSHA Reporting is Necessary**

- a. If HCW does not work in a classification identified in the facility's Aerosol Transmissible Diseases (ATD) Standard (generally this will include staff who do not come into contact with patients or infectious materials) contact the County Occupational Safety and Environmental Compliance (OSEC) Office for assistance in determining whether Cal/OSHA's Emergency Temporary Standards (ETS) apply and if any additional steps need to be taken to comply with the ETS. County guidelines will apply.
- b. Immediately report any serious work-related injury, illness, or death of an HCW to the Risk Management Department, who will review the matter and make any appropriate reports to regulatory authorities. "Serious injury or illness" means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing. With COVID-19 cases, inpatient hospitalizations may occur sometime after the initial knowledge of an HCW's illness; in those cases, inpatient hospitalizations must be reported as soon as the employer learns, or reasonably could learn, of them.

**EMPLOYEE HEALTH RESPONSIBILITIES**

EH staff will provide advice to all the HCWs related to COVID -19 exposure, symptom review and evaluation, quarantine, isolation and testing recommendations based on this policy and the ongoing CDC, CDPH, Cal/OSHA, and local Public Health Department guidelines.

If an HCW refuses testing pursuant to this policy, the HCW's manager will be notified to follow up with the individual to determine if the individual can be reasonably accommodated. In the meantime, the HCW will be presumed to be COVID-19+ for purposes of this policy.

**1. If HCW is symptomatic (regardless of vaccination status):**

- a. Instruct HCW that they **must** remain at home or go home immediately if at work and notify manager and EH on the same day.
- b. If appropriate and safe, EH may arrange for COVID-19 testing prior to HCW leaving worksite.
- c. EH will provide the HCW with a COVID-19 RT-PCR testing at intervals recommended in the [Home Isolation and Quarantine Guidelines](#).
- d. If HCW continues to be exposed to a COVID-19+ case during their isolation, the quarantine period starts immediately and ends 10 days after the COVID-19+ case's isolation period ends.
- e. EH will advise the HCW to consult their own healthcare provider as needed, including if symptoms worsen.
- f. HCW who has a negative COVID-19 test collected at the appropriate intervals as indicated in the [Home Isolation and Quarantine Guidelines](#) may be released to work by EH if at least 24 hours have passed since resolution of fever without the use of fever-reducing medications and other symptoms are improved. If fever has resolved but other symptoms are not improved, EH staff may review case with EH Medical Director or Medical Branch for additional guidance. **HCW may not return to work unless cleared by EH.**
- g. HCW who has a positive COVID-19 RT-PCR test may be released to work by EH upon the following:
  - 1) At least 10 days have passed since symptoms first started or from positive test collection date, whichever is later; AND

- 2) At least 24 hours have passed since resolution of fever without the use of fever-reducing medications; AND
  - 3) Other symptoms have improved. *\*\* Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation.*
- h. The timeframe from symptom onset may be extended to up to 20 days for HCWs who are severely immunocompromised or who had critical illness (e.g., required intensive care). Severely immunocompromised includes, but is not limited to, the following individuals with: chemotherapy for cancer treatment, hematologic malignancies, being within one year of receiving a hematopoietic stem cell or solid organ transplant, untreated HIV infection with CD4 T lymphocyte count < 200, combined primary immunodeficiency disorder, and taking immunosuppressive medications (e.g., drugs to suppress rejection of transplanted organs or to treat rheumatologic conditions such as mycophenolate and rituximab, receipt of prednisone >20mg/day for more than 14 days).

**2. If HCW is asymptomatic (regardless of vaccination status):**

- a. COVID-19 RT-PCR testing for close contact exposures regardless of vaccination status are required in accordance with the Public Health Department [Home Isolation and Quarantine Guidelines](#) as follows:
  - i. If not fully vaccinated, HCW must remain at home through Day 7 if a test collected on or after Day 5 from the date of last exposure is negative. If no testing is done, the HCW must stay home through Day 10 from date of last exposure. If HCW had COVID-19 in the last 90 days and does not have any new symptoms since most current exposure, HCW does not need to separate from others (consult with Public Health Department).
  - ii. If fully vaccinated, test immediately after exposure to the COVID-19 case and then again on or after Day 5 or later from their last exposure to a COVID-19 case. HCW does not need to stay home unless becomes symptomatic.
- b. All close contacts, including those who previously had COVID-19 and including those who are fully vaccinated, must immediately self-isolate and get tested if they develop symptoms in the 14 days following their last exposure to the COVID-19 case.
- c. Asymptomatic individuals who are not close contacts of a COVID-19 case are not required to get tested unless recommended or asked to do so by EH, IP, Hospital Command Center, or the Public Health Department.

**3. If HCW is COVID-19 Positive (regardless of vaccination status):**

- a. On same day (or next business day) as the COVID-19+ test result is reported to EH, EH will send the Exposure Information Form to the manager to complete if one has not already been submitted.
- b. When completed by the manager, EH will review the Exposure Information Form and provide advice to the HCWs listed on the Exposure Information Form and their manager consistent with this policy.
- c. If a COVID-19+ HCW was tested at an outside facility, a copy of the test result will be requested from the HCW as well as reason for testing.
- d. The process outlined below shall be followed regardless of whether or not a copy of the test result is received. There should be no delay in contact tracing while awaiting a copy of the result.
- e. On the same day as the COVID-19 positive result is reported to EH, EH will complete the HICS form providing information about the COVID-19+ HCW to the Hospital Command Center.
- f. In addition, EH will notify County Public Health Department of the COVID-19 positive result within the time frame required by Public Health, and provide any information needed by the Public Health Department, including to Public Health Department contact tracers.

- g. EH will also provide County Incident Report to County Counsel in format requested by County Counsel, which is separate from Public Health Department reporting. See Reporting Requirements below.

**4. Return to Work Clearance**

**A. Fully Vaccinated Asymptomatic HCWs:** May continue to work onsite during their post-exposure period if they meet ALL of the following criteria:

- Are fully vaccinated. This is defined as greater than or equal to 2 weeks following receipt of the second dose in a 2-dose vaccine or greater than or equal to 2 weeks following receipt of one dose of a single-dose vaccine.
- Have remained asymptomatic since the current COVID-19 exposure. If at any time the HCW develops symptoms (including mild symptoms such as runny nose or sore throat), the isolation period will start from the onset of symptoms and the HCW will be categorized as symptomatic.
- Do not have underlying immunocompromising conditions (e.g., organ transplantation, cancer treatment)
- Test negative immediately following post exposure and again on or about Day 5 following exposure.
- All exposed HCWs must continue wearing a surgical mask or N95 respirator and eye protection for source control within the facility and continue to comply with all symptom screening and reporting requirement.

**B. Unvaccinated and Partially Vaccinated Asymptomatic HCWs:**

- RT-PCR test on or about day 5 after last exposure to case. HCW must stay home through Day 7 if a test collected on or after Day 5 from the date of last exposure is negative. If HCW remains asymptomatic for entire 7 days, return to work on Day 8.
- If no testing is performed, quarantine at home for 10 days from last exposure and monitor systems. If HCW remains asymptomatic for the entire 10 days, return to work on Day 11. If at any time the HCW develops symptoms (including mild symptoms such as runny nose or sore throat), the isolation period will start from the onset of symptoms and the HCW will be categorized as symptomatic.
- If HCW had COVID-19 in the prior 90 days and does not have any NEW symptoms since current exposure, HCW does not need to separate from others (consult with Public Health Department).
- If isolation from the COVID+ case is not feasible, and HCW continues to be exposed to COVID-19 case during their isolation, the HCW must remain at home in quarantine up through 10 days from the last day of quarantine of the positive COVID-19 source and may not return to work even during critical staffing shortages.
- If exposure involves a household member, an exposure exists for the duration that HCW has close contact with the COVID+ source, is caregiver for the COVID+ source, or uses the same living space (e.g., kitchen, bathroom, hallway, TV room, bedroom, etc.) with the COVID+ source. In this case the entire quarantine period for the HCW may last 20-24 days. If HCW tests positive, follow return to work guidance for COVID-19 positive HCWs.

**C. Symptomatic HCWS Regardless of Vaccination Status:**

- Isolation for at least 10 days from onset of symptoms, and at least 24 hours have passed since resolution of fever without the use of fever-reducing medications AND other symptoms have improved.
- The timeframe from symptom onset could be *extended* to up to 20 days for individuals who are severely immunocompromised (e.g., currently receiving chemotherapy, or recent organ transplant. Note: *Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation.*

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## **REPORTING REQUIREMENTS**

- A. Clusters/Outbreaks<sup>1</sup>.** EH is responsible for identifying any clusters and will notify applicable IP Department, Unit Manager and Hospital Command Center. EH will also collaborate with Unit Manager, IP, medical branch and risk management in investigating potential clusters/outbreak.
- B. Cal/OSHA**
- EH shall Immediately report any serious work-related injury, illness, or death of an HCW to the Risk Management Department, who will review and make any appropriate reports to regulatory authorities. "Serious injury or illness" means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing.
  - With COVID-19 cases, inpatient hospitalizations may occur sometime after the initial knowledge of an HCW's illness; in those cases, inpatient hospitalizations must be reported as soon as the employer learns, or reasonably could learn, of them. See below for reporting by Risk Management.
- C. Public Health Department**

EH shall report COVID-19 positive case to the County Public Health Department as follows in the event the HCW has a confirmed positive case of COVID-19 and was at the workplace either: (a) within the 48 hours prior to onset of symptoms or within 10 days after onset of symptoms if they were symptomatic; or (b) within 48 hours of the

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<sup>1</sup> Cluster/Outbreak is defined as follows:

### **Individuals Working in Acute Care and Clinic Settings**

(See CDPH AFL 20-75.1 for further information): ≥2 cases of confirmed COVID-19 in a patient 7 or more days after admission for a non-COVID condition, with epi-linkage (defined as overlap on the same unit or ward for any duration or having the potential to have been cared for by common healthcare personnel within a 14-day period of each other) ; or ≥2 cases of confirmed COVID-19 in HCW with epi-linkage (defined as having the potential to have been within 6 feet for 15 minutes or longer while working in the facility during the 14 days prior to the onset of symptoms or positive test (for example, worked on the same unit during the same shift) who do not share a household, and are not listed as a close contact of each other outside of the workplace during standard case investigation or contact tracing in counties with <4 daily new cases per 100k population or <5% test positivity based on the county positivity rate reported in the past week, or ≥3 cases of confirmed COVID-19 in HCW with epi-linkage who do not share a household, and are not listed as a close contact of each other outside of the workplace during standard case investigation or contact tracing in counties with ≥4 daily new cases per 100k population or ≥5% test positivity based on the county positivity rate reported in the past week.

**Individuals Working in Long Term Care Setting** ≥1 facility-acquired (defined as a confirmed diagnosis 14 days or more after admission for a non-COVID condition, without exposure during the previous 14 days to another setting where an outbreak was known or suspected to be occurring) COVID-19 case in a resident.

### **Individuals Working in Other Settings.**

(See 8 CCR 3205.1) An "outbreak" is 3+ COVID cases "within an 'exposed group'" that visited the workplace during the high-risk exposure period during a 14-day period. High-risk exposure period is defined as: (A) For COVID-19 cases who develop COVID-19 symptoms, from two days before they first develop symptoms until all of the following are true: it has been 10 days since symptoms first appeared; 24 hours have passed with no fever, without the use of fever-reducing medications; and symptoms have improved. (B) For COVID-19 cases who never develop COVID-19 symptoms, from two days before until 10 days after the specimen for their first positive test for COVID-19 was collected.

"Exposed group" is defined as: All employees at a work location, working area, or a common area at work, where an employee COVID-19 case was present at any time during the high-risk exposure period. A common area at work includes bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. The following exceptions apply: (1) For the purpose of determining the exposed group, a place where persons momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work; (2) If the COVID-19 case was part of a distinct group of employees who are not present at the workplace at the same time as other employees, for instance a work crew or shift that does not overlap with another work crew or shift, only employees within that distinct group are part of the exposed group; (3) If the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period, and the COVID-19 case was wearing a face covering during the entire visit, other people at the work location, working area, or common area are not part of the exposed group.

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date on which they were tested or within 10 days after the date on which they were tested if they were asymptomatic, EH must report the positive case within 24 hours to the Public Health Department through the Worksite Case and Contact Reporting Portal available at [www.sccsafeworkplace.org](http://www.sccsafeworkplace.org).

The reporting process is a two-step process. After reporting basic information about the exposure, Employee Health ("reporter") will receive login information for a secure portal to submit case and contact information. The reporting requirements will not be fully met until the reporter submits case and contact information for all individuals involved in the workplace exposure. If the reporter has never accessed the secure portal before, they will receive an email to set up an account. The reporter should check their email's spam/junk folder if they have not received this email within one business day of submitting their first SPOT Intake Form.

#### **D. County Internal Reporting**

- In addition to the required reporting to the Public Health Department for the specified COVID-19 positive cases, EH must report all COVID-19 positive personnel cases they become aware of to the Office of the County Counsel at [incident@cco.sccgov.org](mailto:incident@cco.sccgov.org).
- Reporting to [incident@cco.sccgov.org](mailto:incident@cco.sccgov.org) is required on the same day the department learns of the COVID-19 positive case. This is an attorney-client privileged communication.
- EH shall provide the following information in the body of the email:
  - Name of COVID-19 positive personnel.
  - Position title of the COVID-19 positive personnel
  - Street address of location where personnel is typically based to work
  - Date of positive test (this is the date specimen or sample was collected for testing (not the date of the test result)
  - Last date the personnel worked on-site
  - If the personnel have worked on-site in the 14 days prior to the test collection date, list EVERY facility address (street address, city, zip) where they worked during those 14 days
  - Date the department received notification from the personnel
  - If reporting to the Public Health Department was required for this case (i.e, the personnel was present in the workplace either (1) within the 48 hours prior to onset of symptoms or within 10 days after onset of symptoms if they were symptomatic or (2) within 48 hours of the date on which they were tested or within 10 days after the date on which they were tested if they were asymptomatic), confirm that the Department has reported to the Public Health Department through the Worksite Case and Contacting Reporting portal.
  - Departmental contact name for any questions.
  - Departmental contact email/phone.

#### **E. Hospital Command Center Reporting**

- a. When a COVID-19+ or COVID-19 exposed HCW is reported to EH, EH will determine what department the HCW (or County employee) works for.
- b. If the HCW or County employee does not currently work at the Hospitals and Clinics, EH will notify the designated representative at the location where the HCW currently works. In this situation no further action is necessary by EH except if designated representative at location where HCW/employee currently works requests guidance from EH regarding return-to-work clearance (outside department will in general do their own notice, reporting, and provide their own work clearance in conjunction with guidance from the County Public Health Department).

- c. EH will also complete the HICS form providing information about the COVID-19 positive HCW or County employee to the Hospital Command Center.
- d. The HICS form will indicate what symptoms are present if HCW was symptomatic (or indicate if no symptoms) and the HCWs vaccination status and other relevant information surrounding the exposure.
- e. EH will also indicate on the HICS form if the HCW was involved in direct patient contact. If the HCW was involved in direct patient contact, or there is other reason to suspect patient exposure based on information received by EH, the HICS form will also be sent to IP in the respective healthcare facility.

#### **INFECTION PREVENTION DEPARTMENT AND RISK MANAGEMENT RESPONSIBILITIES**

- A. Upon notification from Manager or EH about potential patient exposures, IP will follow their policies on patient notification, testing, risk management notification and reporting.
- B. Upon notification from EH of a potential cluster, IP will review the case with EH, and work with location managers, and Hospital Command Center designees.
- C. IP will notify Risk Management and the County Public Health Department.
- D. If a cluster/outbreak is identified, IP, County Public Health Department, Risk Management, EH, Managers, and Hospital Command Center designees will work together on a mitigation plan. Department leaders of the cluster location will be responsible for sending out notification, including notice to all HCWs working on the unit/department at the time of exposure (including ancillary and other staff), and considering expedited testing to all such individuals at the time of notice. This notification will occur by the end of the following business day. If the first test is done within 6 days of exposure and is negative, a second test will be offered approximately 6-10 days later after exposure date. Patients will also be tested as appropriate as determined by IP in conjunction with County Public Health Department.
- E. Risk Management is responsible for regulatory reporting, including but not limited to, cluster reporting to CDPH and SCCPHD, and any reporting of "serious work-related injury, illness, or death of a HCW to Cal/OSHA, and will ensure that all such reporting is completed promptly.
- F. Further investigation into the cause of HCW transmission, improving environmental controls, and education will be carried out, in consultation with County Public Health Department as appropriate.
- G. If COVID-19 positive HCW **does not** work in a classification identified in the facility's Aerosol Transmissible Diseases (ATD) Standard, the manager will contact the County Occupational Safety and Environmental Compliance (OSEC) Office for assistance in determining whether Cal/OSHA's Emergency Temporary Standards (ETS) apply and if any additional steps need to be taken to comply with the ETS.

**Deviations from these guidelines may be made on a case-by-case base as determined necessary by IP, EH, or the Hospital Command Center.**

**Contact Information:**

**County Office of Occupational Safety and Environmental Compliance (OSEC): 408-441-4280**

**Employee Health Department: 408-283-7474**

**ATTACHMENTS**

**Attachment A - Intentionally Deleted**

**Attachment B - Checklist For Managers When There is a New Covid-19 Positive Case at the Workplace (with Appendices 1-4)**

**References, as amended from time to time:**

<https://www.sccgov.org/sites/phd-p/Diseases/novel-coronavirus/Pages/COVID-19-Facts-and-FAQ.aspx#FAQ>

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html>

[https://www.dir.ca.gov/dosh/dosh\\_publications/ATD-Guide.pdf](https://www.dir.ca.gov/dosh/dosh_publications/ATD-Guide.pdf)

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<https://www.cdc.gov/coronavirus/2019-ncov/more/scientific-brief-options-to-reduce-quarantine.html>

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/mitigating-staff-shortages.html>

Senate Bill 1159 (2020) Assembly Bill 685 (2020)

Cal/OSHA Regulation Sections 3205-3205.4

October 5, 2020 Order of the Health Officer of County of Santa Clara

CDPH All Facilities Letter 21-08.3 (June 28, 2021), 20-75.1 (July 22, 2021);

County of Santa Clara guidelines in for determining compliance with Cal/OSHA's Emergency Temporary Standards (ETS)

Santa Clara County Public Health's Provider Responsibilities and Guidance.

<https://publichealthproviders.sccgov.org/diseases/covid-19/provider-responsibilities-and-guidance#Exposure>

County of Santa Clara Public Health Department Home Isolation and Quarantine Guidelines, [Home-Isolation-Quarantine-Guidelines-10-28-21.pdf \(sccgov.org\)](#) (October 28, 2021)

County of Santa Clara COVID-19 vaccination requirement for County personnel Memo (August 5, 2021)

County of Santa Clara Responding to COVID-19 Cases, Close Contacts, and Symptomatic Individuals in the Workplace Memo (July 30, 2021)

Revised: 4.15.21, 5.28.21, 12.16.21

**ATTACHMENT A – Intentionally Deleted**

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## ATTACHMENT B

### Checklist For Managers When There's a COVID-19 Positive HCW at the Workplace

#### NOTE: Additional Requirements May be Applicable for HCWs Who Are Not Covered by the Facility's Aerosol Transmissible Disease Plan.

- Interview the COVID-19 Positive HCW and complete and return to Employee Health **no later than 5:00 p.m. the next business day** of notice of the COVID-19 positive HCW, the COVID-19 Positive Case and Community Exposure Close Contact Information Form (**Appendix 1**):
  - Send notifications within **1 business day** of notice of the COVID-19 positive HCW to the following:
    - The COVID-19 positive employee. Use the COVID-19 Positive Employee Template: (**Appendix 2**)
      - **Do not** include anyone else in this notification.
    - Each close contact listed on the Community Exposure Close Contact Information Form in the exposed workplace<sup>2</sup> **and** their respective labor unions.
      - Email the General Notification Template to each employee (do not include all employees on one email) (**Appendix 3a** (symptomatic HCW) **and Appendix 3b** (asymptomatic HCW)).
      - Copy the employee's labor union on the email that you send to the close contact
    - All employees who were on the premises at the exposed workplace as the COVID-19 case during the infectious period (and not notified as a close contact in above step) **and** their respective labor unions.
      - Email the General Notification Template: [**Appendix 4**].
      - Copy the applicable labor union on the email that you send to the employees
    - Independent contractors and employers of contractors (including vendors, service technicians, and individual contracted service providers) who were on the premises at the same worksite as the COVID-19 case.
      - Email the General Notification Template to each independent contractor and employer of contractors separately (i.e. do not include all independent contractors and employers of contractors on one email) (**Appendix 4**):
  - Notify Infection Prevention Dept of any possible patient exposures.
  - Notify Risk Management if Cal/OSHA or CDPH reporting is required per this policy.
  - Maintain records of the notifications outlined above for **at least three years**.
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**ATTACHMENT B to COVID-19 Exposure Policy  
Appendix 1**

**EXPOSURE INFORMATION FORM ATTACHED** (check latest version on the Hub:  
[Hospitals&Clinics | COVID-19 Updates \(sccgov.org\)](#))

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**ATTACHMENT B to COVID-19 Exposure Policy  
Appendix 2 (Notification to COVID-19 Positive HCW)**

**Email template for notification to the COVID-19 positive HCW. DO NOT INCLUDE ANYONE ELSE ON THIS NOTIFICATION. To maintain confidentiality, this notification should only go to the HCW.**

Dear Healthcare Worker,

Please read the [Public Health Department's Home Isolation Steps](#) and follow them closely.

Our Public Health Officer has put in place many directives and recommendations to reduce the spread of disease in our community. Please check the [Public Health Website](#) for the latest information and guidance. <https://www.sccgov.org/sites/covid19/Pages/home.aspx>.

Thank you for doing your part to stop the spread of the virus and keep our community healthy.

Sincerely,

[MANAGER]

**Summaries of Benefits That May Be Available**

1. <https://www.labor.ca.gov/coronavirus2019/#chart>
2. [https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ\\_ENG.pdf](https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ_ENG.pdf)

**Workers' Compensation**

1. <https://www.dir.ca.gov/dwc/Covid-19/FAQ-SB-1159.html>
2. <https://www.dir.ca.gov/dwc/Covid-19/Index.html>
3. <https://www.dir.ca.gov/dwc/TemporaryDisability.htm>

**Leaves**

1. <https://employeeservices.sccgov.org/county-santa-clara-covid-19-employee-guidance>
2. <https://www.dir.ca.gov/dosh/coronavirus/COVID19FAQs.html>
3. <https://www.dir.ca.gov/oshsb/documents/COVID-19-Prevention-Emergency-apprvd.txt.pdf>

**Anti-Discrimination and Anti-Retaliation**

The County will not retaliate or discriminate against any employee who lawfully takes leave or who discloses to the County the employee's positive COVID-19 test, diagnosis, or an order for the employee to quarantine or isolate.

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1. <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>
  2. <https://www.dir.ca.gov/dlse/COVID19resources/RLLVFileClaims.html>
  3. <https://www.sccgov.org/sites/eod/Pages/home.aspx>
  4. <https://www.sccgov.org/sites/eod/Documents/policy-against-discrimination-harassment-retaliation.pdf>
  5. [https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ\\_ENG.pdf](https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ_ENG.pdf)
  6. [https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA\\_Poster\\_WH1422\\_Non-Federal.pdf](https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA_Poster_WH1422_Non-Federal.pdf)

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**ATTACHMENT B to COVID-19 Exposure Policy  
Appendix 3a (Symptomatic Close Contact Template Letter)**

**(Fillable PDF of the below template can be found [here](#) )**

Date \_\_\_\_\_,

I am writing to inform you that a healthcare worker in your department has tested positive for COVID-19. The affected healthcare worker has been directed to isolate at home and seek medical attention. The healthcare worker was present on the unit within the 48 hours prior to onset of symptoms for COVID-19. We have cleaned all areas, including shared spaces, that the affected staff member used at work.

If you have not received direct notification from Employee Health regarding other potential exposure or instructions to self-quarantine, please continue to follow standard precautions for all staff in the Hospitals and Clinics to reduce the spread of the disease: practice good hand hygiene, do not come to work if feeling sick or experiencing a fever, maintain at least 6 feet distance from others where possible, clean frequently used or high touch surfaces and shared spaces, wear a facemask at all times or use other PPE when providing clinical care, consistent with current guidelines.

At this time, if you do not have any symptoms consistent with COVID-19 (fever, persistent cough, shortness of breath, chills, night sweats, sore throat, nausea, vomiting, diarrhea, unusual and significant tiredness, muscle or body aches, headaches, confusion, or loss of sense of taste/smell), and are not otherwise recommended to self-quarantine by a healthcare professional, Employee Health, or public health official, you are expected to continue reporting to work. We will continue to ensure your safety and access to needed supplies and personal protective equipment.

Employee Health may contact you to offer a COVID-19 test, or you may contact Employee Health yourself to schedule. In the meantime, please notify your manager and Employee Health if you experience any of the symptoms consistent with COVID-19 mentioned above (in which case please do not come to work), or if you have any questions.

Thank you for everything you are doing to support each other and our patients during this difficult time.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

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**ATTACHMENT B to COVID-19 Exposure Policy  
Appendix 3b (Asymptomatic Close Contact Template Letter)**

Fillable PDF of the below template can be found [here](#)

Date \_\_\_\_\_

Dear Staff and Physicians,

I am writing to inform you that a healthcare worker in your department has tested positive for COVID-19. This individual was last in the workplace on or about the date noted above and had no influenza-like symptoms or any other known symptoms for COVID-19 within at least the 48-hours prior to that date. Due to the unknown infectious risk of an asymptomatic person and the possibility that the individual is in the pre-symptomatic period (will develop symptoms over the coming days), the staff member has been instructed to self-isolate at home for at least 14 days from the test collection date. We have cleaned all areas, including shared spaces, that the affected staff member used at work.

If you have not received direct notification from Employee Health regarding other potential exposure or instructions to self-quarantine, please continue to follow standard precautions for all staff in the Hospitals and Clinics to reduce the spread of disease: practice good hand hygiene, do not come to work if feeling sick or experiencing a fever, maintain at least 6 feet distance from others where possible, clean frequently used or high touch surfaces and shared spaces, wear a mask at all times or use other PPE when providing clinical care, consistent with current guidelines.

At this time, if you do not have any symptoms consistent with COVID-19 (fever, persistent cough, shortness of breath, chills, night sweats, sore throat, nausea, vomiting, diarrhea, unusual and significant tiredness, muscle or body aches, headaches, confusion, or loss of sense of taste/smell), and are not otherwise recommended to self-quarantine by a healthcare professional, Employee Health, or public health official, you are expected to continue reporting to work. We will continue to ensure your safety and access to needed supplies and PPE.

Please notify your manager and Employee Health if you experience any of the symptoms consistent with COVID-19 mentioned above, or if you have any questions.

We are also offering asymptomatic testing to all staff in a phased approach. Please refer to the Employee Asymptomatic Testing Policy on the Communications Hub for further information: <https://www.scvmc.org/COVID19/covid-19-update.html>

Thank you for everything you are doing to support each other and our patients during this difficult time. We will continue to provide information to you as we receive it, and you may contact the undersigned or Employee Health with any questions.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

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**ATTACHMENT B to COVID-19 Exposure Policy**  
**Appendix 4 - General Notice to Entire Unit/Department**

Dear \_\_\_\_\_,

I am writing to inform you of a possible exposure on \_\_\_\_\_ to a confirmed COVID-19 case in the workplace in your department or unit. The COVID-19 positive person is self-quarantining at home and following instructions from Employee Health and their medical provider.

This is a general notification. Individuals who were identified to have been in close contact with the COVID-19 positive person will receive separate notification and instructions from their manager and Employee Health. Please continue to follow standard protocols for masking, hand hygiene, symptom monitoring, and social distancing.

COVID-19 is an infectious disease that can be spread: a) through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; or b) by touching a contaminated object then touching the eyes, nose, or mouth, although less common. An infectious person may not have symptoms. Cal/OSHA defines a COVID-19 exposure (also referred to herein as a "Close Contact") as being within six feet of a COVID-19 case for a cumulative total of 15 minutes or more in any 24-hour period during the COVID-positive person's high-risk exposure period. The high-risk exposure period begins two days before they first develop symptoms or two days before their positive test and lasts until at least 10 days after their symptoms first appeared or their positive test was done.

COVID-19 testing is available through the Employee Health Department or through one of the County's various testing sites located at [www.sccfreetest.org](http://www.sccfreetest.org). Please review the COVID-19 Communications Hub for testing schedule and testing policies, or call Employee Health for further information: <https://www.scvmc.org/COVID19/covid-19-update.html>.

Our Public Health Officer has put in place many directives and recommendations to reduce the spread of disease in our community. Please check the County Public Health Department website for the latest information and guidance. <https://www.sccgov.org/sites/covid19/Pages/home.aspx>.

If you develop COVID-19 symptoms (fever or chills, cough, shortness of breath or difficulty breathing, sore throat, nausea, vomiting, diarrhea, fatigue, muscle or body aches, headaches, or

loss of sense of taste/ smell), contact Employee Health and your manager immediately. If you become ill and are unable to work remotely or excluded from work due to quarantine/isolation requirements, you may be entitled to certain leave or other COVID-19-related benefits. Information about benefits that may be available to you can be found at the following links:

**Summaries of Benefits That May Be Available**

1. <https://www.labor.ca.gov/coronavirus2019/#chart>
2. [https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ\\_ENG.pdf](https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ_ENG.pdf)

**Workers' Compensation**

1. <https://www.dir.ca.gov/dwc/Covid-19/FAQ-SB-1159.html>
2. <https://www.dir.ca.gov/dwc/Covid-19/Index.html>
3. <https://www.dir.ca.gov/dwc/TemporaryDisability.htm>

**Leaves**

1. <https://employeeservices.sccgov.org/county-santa-clara-covid-19-employee-guidance>
2. <https://www.dir.ca.gov/dosh/coronavirus/COVID19FAQs.html>
3. <https://www.dir.ca.gov/oshsb/documents/COVID-19-Prevention-Emergency-apprvd.txt.pdf>

**Anti-Discrimination and Anti-Retaliation**

The County will not retaliate or discriminate against any employee who lawfully takes leave or who discloses to the County the employee's positive COVID-19 test, diagnosis, or an order for the employee to quarantine or isolate.

1. <https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws>
2. <https://www.dir.ca.gov/dlse/COVID19resources/RLLVFileClaims.html>
3. <https://www.sccgov.org/sites/eod/Pages/home.aspx>
4. <https://www.sccgov.org/sites/eod/Documents/policy-against-discrimination-harassment-retaliation.pdf>
5. [https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ\\_ENG.pdf](https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/03/DFEH-Employment-Information-on-COVID-19-FAQ_ENG.pdf)
6. [https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA\\_Poster\\_WH1422\\_Non-Federal.pdf](https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA_Poster_WH1422_Non-Federal.pdf)

Thank you for doing your part to stop the spread of the virus and keep our community healthy.

Sincerely,

[MANAGER]