



Management of COVID-19 Workplace Investigations and Staff Notifications

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Effective 10/16/2024, the San Francisco Department of Public Health Order No. 2023-02 requiring COVID-19 vaccination of personnel in healthcare settings has been rescinded. COVID-19 vaccinations are encouraged but not required.

Overview

As the science continues to evolve, much more is understood about the risk of contracting a COVID-19 infection. Previously, physical proximity (closer than six feet) was felt to be the biggest risk factor. While that continues to be a factor, experts have determined that the virus can spread to a distant area of a shared airspace and disseminated largely by aerosol -- tiny particles that can remain in the air -- and as such, spreads more widely and quickly.

Employees who are located within the same shared airspace (example: a contiguous floor of a building) are all at risk of an exposure from a COVID-positive individual who has been in that airspace for more than 15 minutes during their infectious period.

The guidance has evolved to cast a wider net of potentially exposed employees. All employees who are considered a close contact are required to mask for a total of ten days after their last known exposure, and testing is recommended only for those at higher risk of severe disease or who have contact with those at higher risk of severe disease, unless there is an outbreak in the workplace, at which point, testing is required.

Identifying “Close Contacts”

Departments must identify workplace “close contacts” after an employee with symptoms who was on site during their infectious period tests positive for COVID-19 and provide notifications to all employees in the workplace of the exposure. This notification procedure is required by Assembly Bill 685, effective June 1, 2021, the emergency regulations issued by Cal/OSHA effective May 6, 2022, clarified in the Emergency Temporary Standard FAQs on June 24, 2022, and most recently, the COVID Prevention Non-Emergency Regulations effective February 3, 2023 through February 3, 2025. Departments must also report COVID-19 infections to the People & Pay portal.

To protect employee privacy and the confidential information obtained during outbreak tracing, Departmental Personnel Officers (DPOs) are responsible for conducting the workplace contact tracing with the COVID-19 positive employees or ensuring that investigations are assigned to the appropriate staff, such as a managers, occupational safety members, department physicians, or other human resources personnel.

The information obtained from the contact-tracing process is employer-held, confidential medical information. Contact tracing investigations should be limited to staff members who regularly handle confidential personnel information. Critical information about test results should be uploaded by employees to People & Pay consistent with this policy. DPOs and authorized users of People & Pay may assist employees if necessary.

Updated Definitions

- **Close Contact** (Non-healthcare employees): A close contact is someone who has shared the same indoor airspace with a symptomatic COVID-19 positive employee for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “infectious period.” In the rare setting of very larger indoor airspace (greater than 400,000 cubic feet per floor), close contact means being within six feet of a COVID-19 positive individual for a cumulative total of 15 minutes or more over a 24-hour period while the person is in their infectious period. Offices, suites, rooms, waiting areas, break or eating areas, bathrooms, or other spaces that are separated by floor-to-ceiling walls are considered distinct indoor airspaces.
- **Exposed Group:** The exposed group includes all employees in the shared indoor airspace (which include common areas such as bathrooms, walkways, hallways, break or eating areas, waiting areas, or any other contiguous floor space including multiple floors if the COVID-19 employee moves between floors), including those working for other employers, where the COVID-19 positive employee was present during the infectious period, with the following exceptions:
 - Everyone is wearing a face covering in areas where persons momentarily pass through without congregating.
 - Distinct work groups or crews in different shifts that do not overlap with the COVID-19 positive employee’s distinct group.
- **Infectious Period:** If COVID-19 positive and symptomatic, the infectious period begins a minimum of **24 hours** prior to the onset of symptoms and ends after 24 hours have passed with no fever (without the use of fever-reducing medications) AND symptoms are mild and improving. If COVID-19 positive and asymptomatic, there is no infectious period for the purpose of isolation or exclusion.
- **Respirator:** A respiratory protection device, such as an N95, approved by the National Institute for Occupational Safety and Health (NIOSH).
Worksite: The building, store, facility, agricultural field, or other location where the COVID-19 positive employee was present during the infectious period, not including buildings, floors, or other locations that the employee did not enter.

Isolation After Positive COVID-19 Test

Isolation and quarantine requirements are based on COVID-19 symptoms and are no longer time-based. Employees need to complete a quarantine that begins with the first signs of showing symptoms and ends when 24 hours have passed with no fever (without the use of fever-reducing medications) and their symptoms are mild and improving. Employees do not need further testing

after their initial diagnostic positive test before returning to work. Testing negative to exit isolation sooner than ten days is still required for health care personnel or Emergency Medical Services personnel.

If fevers persist, isolation should continue until 24 hours after resolution of fever.

If symptoms other than fever are not improving, continue isolation until symptoms are improving or until after day ten. Confirmed cases with severe symptoms or those with high risk of serious disease should contact their health care provider for available treatments.

Employees with COVID-19 symptomatic infection or asymptomatic COVID-19 positive test should mask for a total of ten days. Employees may remove their mask sooner than day ten with two sequential negative tests done at least one day apart.

Employees infected with COVID-19 within the previous 30 days do not need to be tested (even in an outbreak setting) unless symptoms develop, at which time rapid antigen testing is the preferred test.

The following quick reference chart can be used to discuss isolation and quarantine with COVID positive employees and close contacts to ensure they return to work as soon as it is safe to do so.

Condition	Symptoms	Isolation or Quarantine	Test to End work restrictions	Mask***
COVID Positive*	None	None**	Not Required*	10 days
	Mild and resolving, no fever	Minimum of 24 hours from day of symptom onset	Not Required*	10 days
	Fever	Leave isolation 24 hours after resolution of fever without taking fever reducing medication	Not Required*	10 days
	Serious Symptoms****, seek care		Not Required	10 days
Close Contact	No symptoms	None	Recommend test Day 3-5 after exposure for those at risk of severe disease	10 days
	If symptoms develop, follow rules for Covid-like symptoms	Isolation until fever resolves and symptoms improving	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	10 days

COVID like symptoms	Isolate and test, continue to isolate if symptoms persist, even if test is negative	Isolation until fever resolves and symptoms improving	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	10 days
*	Healthcare personnel and Emergency Medical Services personnel are required to document a negative test to exit quarantine sooner than day 10.			
**	Healthcare personnel without symptoms are unable to work sooner than 10 days, until they have a documented negative test.			
***	Two sequential negative rapid tests can be done at least one day apart and uploaded to People & Pay to unmask earlier than day 10.			
****	Employees with persistent symptoms may seek clinical attention.			

Steps for Conducting the COVID-19 Workplace Contact Tracing

1. Immediately Contact the COVID-19 Positive Employee within 24 hours of learning that the employee has tested positive for COVID-19.

- Immediately exclude the infected employee from the worksite if they are symptomatic until they meet return-to-work criteria, and if applicable, provide directions to seek medical care and follow applicable self-isolation requirements;
- Identify whether the employee has visited locations beyond the normal worksite and/or potentially exposed employees from other departments or contractors during the infectious period;
- Support the employee in an empathetic manner regarding any concerns they may have relating to their isolation, condition, and medical supervision;
- Advise the employee of their leave benefits while they are unable to work;
- If the employee believes that they contracted the disease from work and they have been in the workplace 48 hours prior to symptom onset or from the date the COVID test was administered, send the employee a Workers’ Compensation Claim Form; and advise to obtain a PCR test to support the claim; and
- Encourage the employee to contact their healthcare provider for further healthcare guidance, which may include oral treatment.

Beyond review of the location of work and time spent at that location, the interaction should be focused on providing resources and support to an employee who has a COVID-19 diagnosis. Information that they need may include information on leaves, isolation requirements, and assistance with uploading positive results in the People & Pay portal.

2. Send a Close Contact Notification to all staff who were on the premises at the symptomatic COVID-19 positive employee’s worksite during the infectious period within one business day of learning of the positive employee.

Close contact notifications should be sent to employees in the manner normally used to communicate with the employees (can be email, text, or personal service) and include the following information without identifying any details about the COVID-19 positive employee:

- Employees who were at the shared airspace worksite for more than 15 minutes are considered close contacts and may continue to work, but must mask for ten days after the close contact exposure.
- Testing after a close contact is not routine for all close contact exposures but recommended only for those at higher risk of severe disease or who have contact with those at higher risk of severe disease.
- In the setting of an outbreak (three or more cases in a given location within a seven-day period), masking is required and **weekly testing for employees in the exposed group is required** after exposure until the outbreak is resolved. Employees who are unable to test by day five must be excluded from the workplace for the balance of their ten-day quarantine period. If the employee is excluded from the workplace but feels able to work, determine if telecommute options are available. Employees who were not at work during the relevant period and remain symptom-free and employees who recently recovered from COVID-19 (within the last 30 days) who are symptom-free are not required to test.
- In the setting of a major outbreak (20 or more infections within a 30-day period), **testing is required twice weekly for the employees in the exposed group** until the cases are reduced to less than three in a 14-day period, at which point testing is reduced to weekly until outbreak is resolved. Employees who were not at work during the relevant period and remain symptom-free and employees who recently recovered from COVID-19 (within the last 30 days) who are symptom-free are not required to test.

In situations where there are multiple departments within a common space or building where the COVID positive employee worked during the infectious period, the DPO should forward the notification to the other departmental DPOs for distribution to their employees.

An outbreak is resolved when there are one or fewer new COVID-19 cases detected in the exposed group for a continuous 14-day period.

Sample Close Contact workplace notifications (for email and letter) meeting these provisions are included in the Attachments section of this document.

A copy of the primary DPO contact by department can be found on the DHR eLibrary under "Guidance".

3. **If there were subcontracted employees at the CCSF worksite (defined above) during the infectious period of a COVID-19 positive employee (defined above), send a general notice to that employer.**

A sample template is included in Attachment A.

4. Reporting Requirements:

To People & Pay: Employees must upload proof of their positive test result, whether they are results from a lab or from a Rapid Test that was observed or self-administered, using the Employee Portal. A negative test is required to return sooner than day ten from isolation with healthcare workers and Emergency Medical Services Personnel, and should be uploaded to People & Pay. A photo of the Rapid Test result is sufficient. DPOs may assist employees if they are unable to upload their information to People & Pay.

To DHR: If you have three or more COVID-19 positive employees in an exposed group within a rolling seven-day period in the specific worksite, defined as an outbreak, you are required to immediately report the outbreak to DHR and Fiona Wilson, MD (Fiona.wilson@sfgov.org) and follow the Outbreak Guidance, which includes re-instituting face masking. **Testing is required** at least weekly until there are one or fewer new cases for a 14-day period, and the area is out of outbreak status.

The following information must be included in the outbreak notification to DHR:

- a. Employee Name
- b. Date of symptom onset
- c. Date COVID-19 test
- d. Contact information
- e. Workplace location and address
- f. Whether hospitalized or died (if known)
- g. North American Industry Classification Code (NAIC) of the workplace (go to <https://www.naics.com/search/> to find the code)

Resources and References:

- [Managing Outbreaks and Multiple Infections Guidance](#)
- [Managing COVID-19 and Maintaining Safe and Healthy Worksites](#)

Attachment A: Notification Templates

A1: Sample email for General Close Contact Communication to all staff who were present in the exposed worksite (as defined) - REQUIRED

Dear Colleagues,

We are writing to share the information that a coworker has tested positive for COVID-19. Please be advised that the positive employee was at the worksite located at (list the specific work location, e.g., floor of building, shop, building number, trailer, etc.) during their potentially infectious period from (insert date for 24 hours prior to positive test and the onset of symptoms). All employees who were at the above address in the shared airspace address for more than 15 minutes within 24 hours during this time frame are now considered a close contact to the COVID-19 employee. This broader definition of close contact has been adopted as the new Cal/OSHA standard and recognizes that COVID-19 is spread by aerosol, and thus can disseminate widely and expose others.

- All exposed employees are **required to mask for ten days** after a close contact.
- Testing after a close contact is not routine for all close contact exposures but recommended only for those at higher risk of severe disease or who have contact with those at higher risk of severe disease.

Condition	Symptoms	Isolation or Quarantine	Test to End work restrictions	Mask***
COVID Positive*	None	None**	Not Required*	10 days
	Mild and resolving, no fever	Minimum of 24 hours from day of symptom onset	Not Required*	10 days
	Fever	Leave isolation 24 hours after resolution of fever without taking fever reducing medication	Not Required*	10 days
	Serious Symptoms****, seek care		Not Required	10 days
Close Contact	No symptoms	None	Recommend test Day 3-5 after exposure for those at risk of severe disease	10 days

	If symptoms develop, follow rules for Covid-like symptoms	Isolation until fever resolves and symptoms improving	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	10 days
COVID like symptoms	Isolate and test, continue to isolate if symptoms persist, even if test is negative	Isolation until fever resolves and symptoms improving	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	10 days
*	Healthcare personnel and Emergency Medical Services personnel are required to document a negative test to exit quarantine sooner than day 10.			
**	Healthcare personnel without symptoms are unable to work sooner than 10 days, until they have a documented negative test.			
***	Two sequential negative rapid tests can be done at least one day apart and uploaded to People & Pay to unmask earlier than day 10.			
****	Employees with persistent symptoms may seek clinical attention.			

This also serves as a reminder to all employees of the importance of continuing to follow all safety guidance. To be cautious, we ask that you follow your health closely for any possible development of symptoms over the next ten days. Symptoms include a fever of 100.4°F (38°C) or more, shivering or chills, cough, trouble breathing or short of breath, tiredness or fatigue, muscle or body aches, loss of sense of smell or taste, headache, sore throat, persistent runny nose (not from allergies), diarrhea, nausea or vomiting. Employees are welcome to contact the City’s Nurse Triage Line at 855-850-2249 with questions. For further reassurance, you may seek testing through your healthcare provider.

If you develop symptoms and or test positive for COVID-19, report it to your supervisor, manager, or departmental personnel officer immediately. The City provides the following benefits and protections to employees:

Leave Benefits: Employees who must be excluded from the workplace due to COVID-19 symptoms or infection may use paid Sick Leave, or other accrued leave, if eligible, during the time that they are excluded from the workplace and telecommuting is not available.

Eligibility for Workers’ Compensation Benefits: Employees who become ill with COVID-19 due to an exposure in the workplace may be eligible for Workers’ Compensation Benefits. If this happens, please contact me immediately at [*insert phone number*]. To be eligible, you must show a positive PCR test result from a lab, a home rapid antigen test may not be sufficient. I will send you (or have included) a Workers’ Compensation Claim Form to complete if this happens. The City’s Workers’ Compensation Claims Administrator will determine your eligibility.

Workers’ Compensation leave benefits are set by state law. Eligible employees are required to use any available COVID-19 leave benefits before any workers’ compensation temporary disability benefits or industrial disability benefits can be paid.

Report Hazards: Employees are urged to report any possible exposures or hazards to their supervisor, manager, or safety professional in their departments. City employees may also report

unsafe or unhealthy conditions by emailing DHR at DHRCitySafety@sfgov.org or by calling the **DHR Safety Reporting Line: 415-557-4999**.

Protections for Employee from Retaliation: The law and City policy also prohibit retaliation against any employee for filing a complaint about practices they believe are discriminatory or for participating in an investigation, proceeding, or hearing conducted by the Equal Employment Opportunity Commission or the Department of Fair Employment and Housing. If you believe you have been retaliated against, you should report it to your supervisor or manager, or, you may call the DHR Harassment Helpline at (415) 557-4900 for guidance.

Protections for Employees from Discrimination: Employers may not discriminate against an employee because of this workplace exposure that requires exclusion from the workplace. Please immediately report any harassing, retaliatory, or discriminatory behavior that you experience. For information and assistance on the complaint procedure, you may call the DHR Harassment Helpline at (415) 557-4900.

A-2: Sample email for an Outbreak Communication to all staff who were present in the exposed worksite (as defined) - REQUIRED

Dear Colleagues,

We are writing to share the information that a coworker has tested positive for COVID-19. Please be advised that the positive employee was at the worksite located at (list the specific work location, e.g., floor of building, shop, building number, trailer, etc.) during their potentially infectious period from (insert date range for 24 hours prior to positive test and the onset of symptoms). All employees who were at the above address in the shared airspace address, for more than 15 minutes within 24 hours, during this time frame are now considered a close contact to the COVID-19 employee. This broader definition of close contact has been adopted as the new Cal/OSHA standard and recognizes that COVID-19 is spread by aerosol, and thus can disseminate widely and expose others.

Furthermore, this site is currently in outbreak status defined as three more COVID-19 cases within a seven-day period. As such there are further requirements:

- All employees are **required to mask for at least 14 days** during an outbreak when working indoors, and when working outdoors when less than 6 feet from another individual.
- All employees **are required to test between Days 3-5** after a close contact in an outbreak.
- All employees **are required to test at least weekly** thereafter until the location is out of outbreak status.
- If you are unable to test by Day five you will be excluded from the workplace until outbreak status has resolved. If you are excluded from the workplace but feel able to work, discuss with your manager if telecommute options are available.
- If this is a major outbreak (20 cases in a continuous 30-day period) testing is required twice weekly until there are three or fewer positive cases, then test weekly.

- Outbreak is resolved when there are one or fewer cases in the exposed group for 14-days.

The isolation and quarantine requirement table below has been adjusted to reflect the longer time required for masking and the required testing during an outbreak.

Condition	Symptoms	Isolation and Quarantine	Test	Mask
Close Contact	No symptoms	None	Test Day 3-5 after exposure, Weekly test until outbreak resolved	>14 days (indoors and outdoors) following last close contact.
	If symptoms develop, follow rules for Covid-like symptoms	Follow rules for symptom-based isolation	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	>14 days
COVID like symptoms	Isolate and test, continue to isolate if symptoms persist, even if test is negative	Follow rules for symptom-based isolation	Test at symptom onset, if negative, and still symptoms repeat test in 1-2 days	>14 days
COVID infection recently recovered <30 days	No Symptoms	None	No Testing for close contact unless symptoms develop	>14 days

This also serves as a reminder to all employees of the importance of continuing to follow all safety guidance. To be cautious, we ask that you follow your health closely for any possible development of symptoms over the next 14 days. Symptoms include a fever of 100.4°F (38°C) or more, shivering or chills, cough, trouble breathing or short of breath, tiredness or fatigue, muscle or body aches, loss of sense of smell or taste, headache, sore throat, persistent runny nose (not from allergies), diarrhea, nausea or vomiting.

Employees are welcome to contact the City’s Nurse Triage Line at 855-850-2249 with questions. For further reassurance, you may seek testing through your healthcare provider.

If you develop symptoms and or test positive for COVID-19, report it to your supervisor, manager, or departmental personnel officer immediately. The City provides the following benefits and protections to employees:

Leave Benefits: Employees who must be excluded from the workplace due to COVID-19 symptoms or infection may use accrued paid Sick Leave, or other paid accrued leave, if eligible, during the time that they are excluded from the workplace and telecommuting is not available.

Eligibility for Workers' Compensation Benefits: Employees who become ill with COVID-19 due to an exposure in the workplace may be eligible for Workers' Compensation Benefits. If this happens, please contact me immediately at (*insert phone number*). To be eligible, you must show a positive PCR test result from a lab, a home rapid antigen test may not be sufficient. I will send you (or have included) a Workers' Compensation Claim Form to complete if this happens. The City's Workers' Compensation Claims Administrator will determine your eligibility.

Workers' Compensation leave benefits are set by state law. Eligible employees are required to use any available COVID-19 leave benefits before any workers' compensation temporary disability benefits or industrial disability benefits can be paid.

Report Hazards: Employees are urged to report any possible exposures or hazards to their supervisor, manager, or safety professional in their departments. City employees may also report unsafe or unhealthy conditions by emailing DHR at DHRCitySafety@sfgov.org or by calling the **DHR Safety Reporting Line: 415-557-4999**.

Protections for Employee from Retaliation: The law and City policy also prohibit retaliation against any employee for filing a complaint about practices they believe are discriminatory or for participating in an investigation, proceeding, or hearing conducted by the Equal Employment Opportunity Commission or the Department of Fair Employment and Housing. If you believe you have been retaliated against, you should report it to your supervisor or manager, or, you may call the DHR Harassment Helpline at (415) 557-4900 for guidance.

Protections for Employees from Discrimination: Employers may not discriminate against an employee because of this workplace exposure that requires exclusion from the workplace. Please immediately report any harassing, retaliatory, or discriminatory behavior that you experience. For information and assistance on the complaint procedure, you may call the DHR Harassment Helpline at (415) 557-4900.

A-3. Sample Close Contact Notification to Independent Contractors and/or other Non-CCSF Employers at a Worksite within one Business Day - REQUIRED

Attention (Insert Management Contact for Any Subcontractors/Non-CCSF Employees)

RE: Notice of Potential Exposure to COVID-19 at [*Insert address of worksite or other identifying information*]

We are writing to share the information that a CCSF coworker has tested positive for COVID-19. Please be advised that the positive employee was at the worksite located at (list the specific work location, e.g., floor of building, shop, building number, trailer, etc.) during their potentially infectious period from (insert date range for 24 hours prior to positive test and the onset of symptoms). All people who were at the above address in the shared airspace address, for more than 15 minutes, during this time frame are now considered a close contact to the COVID-19 employee. This broader definition of close contact has been adopted as the new Cal/OSHA

standard and recognizes that COVID-19 is spread by aerosol, and thus can disseminate widely and expose others.

- All of your employees are **required to mask at this worksite for ten days** after a close contact.
- Testing after a close contact is not routine for all close contact exposures but recommended only for those at higher risk of severe disease or who have contact with those at higher risk of severe disease.
- If this location is currently under outbreak status (three or more cases over the previous 14 days), testing is required. If you are unable to test by day five you will be excluded from the workplace until outbreak status is resolved.

To ensure safety for all at the workplace, please contact any of your employees who may have been present during this time and at these locations.

Condition	Symptoms	Isolation or Quarantine	Test to End work restrictions	Mask***
COVID Positive*	None	None**	Not Required*	10 days
	Mild and resolving, no fever	Minimum of 24 hours from day of symptom onset	Not Required*	10 days
	Fever	Leave isolation 24 hours after resolution of fever without taking fever reducing medication	Not Required*	10 days
	Serious Symptoms****, seek care		Not Required	10 days
Close Contact	No symptoms	None	Recommend test Day 3-5 after exposure for those at risk of severe disease	10 days
	If symptoms develop, follow rules for Covid-like symptoms	Isolation until fever resolves and symptoms improving	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	10 days
COVID like symptoms	Isolate and test, continue to isolate if symptoms persist, even if test is negative	Isolation until fever resolves and symptoms improving	Test at symptom onset, if negative and still symptoms repeat test in 1-2 days	10 days
*	Healthcare personnel and Emergency Medical Services personnel are required to document a negative test to exit quarantine sooner than day 10.			

**	Healthcare personnel without symptoms are unable to work sooner than 10 days, until they have a documented negative test.
***	Two sequential negative rapid tests can be done at least one day apart and uploaded to People & Pay to unmask earlier than day 10.
****	Employees with persistent symptoms may seek clinical attention.