

New CDC Close Contact Guidance Affects Employers

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A change in the definition of "close contact" for purposes of COVID-19 exposure increases the number of people advised to quarantine following an exposure incident, creating an additional challenge for employers in dealing with positive cases.

The [CDC released new guidance](#) last week, updating "close contact" to mean someone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period, from two days before illness onset or specimen collection until isolation. The prior definition required 6-feet proximity to an infected person for 15 *consecutive* minutes during this period.

The change comes as a result of an [outbreak investigation related to a prison in Vermont](#). The investigation found that one infected employee most likely caught the illness during a series of relatively brief encounters with infected but asymptomatic inmates.

If an employee tests positive for COVID-19, an employer should identify all others who worked in "close contact" with the infected individual and advise those employees to self-quarantine. The expanded definition of "close contact" therefore creates a lower threshold for quarantine and may result in fewer employees available to work - especially for restaurants and other industries where employees move around often and may be in repeated "close contact" with multiple other employees for a few minutes at a time.

The CDC guidelines exempt critical infrastructure businesses from the quarantine recommendation, allowing asymptomatic but potentially exposed employees to continue working while self-monitoring and wearing a face mask. Masks are required in all Pennsylvania businesses, in any event.

Employers should review their COVID-19-related infection-control plans and update any contact-tracing questionnaires. In the event of an exposure event and in light of the difficulty of identifying close contacts, employers also may want to review clock-in documentation and security footage rather than simply rely on employee memories.

The Barley Snyder Employment Practice Group can assist you in creating a process for contact tracing or consulting on specific cases. If you have any questions or concerns, please [contact me](#) or [reach out to anyone in the group](#).

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