



NARA COVID-19 Response

Fact Sheet #8, version 3: Contact tracing procedure

July 27, 2020

This fact sheet provides guidance to help protect NARA staff and reduce the spread of the 2019 novel coronavirus disease (COVID-19) in the workplace. This version has been updated to incorporate the latest CDC guidance for returning to work after a COVID-19 diagnosis, symptoms, or exposure. This update also revises our guidance on object quarantine of textual records, based on the latest research on this topic, and clarifies when Designated Officials must report information to NEEQO.

Information regarding persons who have reported positive COVID-19 tests, COVID-19 symptoms, or close contact with COVID-19 must be treated as personally identifiable information (PII).

1. Determine the scope of the potential exposure.

- a. When an individual reports that she or he has been diagnosed with COVID-19, is experiencing COVID-19 symptoms, or has come in close contact with someone who has been diagnosed with COVID-19, the supervisor (for an employee) or COR (for a contractor) should immediately attempt to determine the following information and record the answers:
 - i. Have you been in the facility in the past two weeks?
 - ii. If yes, were you in the facility:
 - (1) In the *last two days before* you were diagnosed or first felt ill;
 - or
 - (2) In the *last 14 days after* you came in close contact with someone who has been diagnosed with COVID-19?
 - iii. If yes:
 - (1) Where did you spend the majority of your time in the facility in the two days before you were diagnosed or first felt ill, or the 14 days after you came in close contact with someone diagnosed with COVID-19?

- (2) In the two days before you were diagnosed or first felt ill, or 14 days after you came in close contact with someone diagnosed with COVID-19, was there anyone else in the facility who you were within 6 feet of for longer than 15 minutes?
- b. Once collected, this information must only be used and disclosed for the purpose and in the manner described in this document. This information relates to the health status of both the sick or exposed person and any other employees or contractors who were exposed to that person. This information must be treated as personally identifiable information (PII) and protected from inadvertent disclosure.
- c. To the greatest possible extent, this information should be collected at the time the diagnosis, symptoms, or close contact are first reported.
 - i. The supervisor should attempt to collect this information at the time the employee first reports her or his diagnosis, symptoms, or potential exposure. The COR should collect this information when a contractor employee or her or his project manager reports the diagnosis, symptoms, or potential exposure.
 - ii. If the information is not gathered immediately, the supervisor, COR, or Designated Official must make at least one additional attempt to collect the information.
 - iii. If the individual does not respond, refuses to provide the requested information, or is incapable of providing the information, the supervisor, COR, or Designated Official should make a record of her or his attempt(s) to contact the individual and discontinue further attempts to gather contact information.

2. Keep sick and exposed individuals at home.

- a. An individual is not permitted to enter any NARA facility for at least 10 calendar days after she or he *reports* that she or he has been diagnosed with COVID-19, is experiencing symptoms of COVID-19, or has come in close contact with someone who has been diagnosed with COVID-19.
 - i. A NARA employee who is on NARA-initiated “home isolation” but is not experiencing symptoms may telework or may be granted weather and safety leave, according to NARA’s leave policy. An employee on home isolation who is experiencing symptoms must take sick (or other personal) leave.
 - ii. A contractor employee who is on NARA-initiated home isolation and is unable to telework must follow their employer’s leave policy.

- b. Return to work.
 - i. No symptoms. An individual who is placed on home isolation without symptoms may return to work after 10 calendar days of experiencing no symptoms.
 - ii. Symptom based. An individual who is placed on home isolation due to COVID-19 symptoms or who experiences symptoms after being placed on home isolation may return to work on the first work day after the date that all of the following conditions are met:
 - (1) 24 hours have passed since the individual's fever is resolved without the use of fever-reducing medication; **and**
 - (2) At least ten calendar days have passed since she or he first experienced symptoms; **and**
 - (3) Any symptoms have improved.

3. Clean the facility to limit potential spread.

- a. If the sick or exposed person has not been in the facility in the 14 calendar days prior to reporting to the supervisor or COR, the facility does not need to be cleaned, regardless of when the employee was actually diagnosed, first felt symptoms, or had close contact with someone who was diagnosed with COVID-19.
- b. If the sick or exposed person has been in the facility any of the 14 calendar days prior to reporting, the Designated Official must ensure the following actions are taken.
 - i. As soon as practicable, close off the areas of the facility that the person entered, visited, or worked in before she or he was diagnosed, or first felt ill, or after she or he came in close contact;
 - ii. Arrange for the custodial contractor to deep clean those areas using NARA's scope of work – *NARA Deep Cleaning and Disinfecting 04072020*; and
 - iii. If feasible, close off the areas that the person spent the most time in (i.e. the employee's response to the question at 1.a.iii(1), above) for 24 hours prior to cleaning.
- c. If the sick or exposed person has been in records or artifact storage space in any of the 14 calendar days prior to reporting, the Designated Official must coordinate

with the supervisor to ensure the following actions are taken.

- i. Close all stacks or bays in which the sick or exposed person last worked;
- ii. Use an approved disinfectant to wipe down all high touch areas of the stack or bay (e.g. door handles, control panels for moveable shelves), as well as any carts, long Johns / streamliners, pallet jacks, ladders, and any other material handling equipment used by the sick or exposed person.
- iii. For textual records: If the sick or exposed person handled any boxes or textual records, do not allow other employees to handle those boxes or records for three calendar days from the last handling by the sick or exposed person. Close off and mark the individual compartment(s) or row(s), as appropriate, containing the materials and mark with signage.
- iv. For artifacts, items in cold storage, or special media: Please consult with the Preservation Programs Division (RX).

4. Notify staff of a potential exposure and place exposed individuals on home isolation.

- a. If the sick or exposed person has not been in the facility in the 14 calendar days prior to reporting to the supervisor or COR, staff do not need to be notified, regardless of when the employee was actually diagnosed, first felt symptoms, or had close contact with someone who was diagnosed with COVID-19.
- b. If the sick or exposed person has been in the facility in any of the 14 calendar days prior to reporting, the Designated Official must notify NARA employees and contractors who work in the facility of the potential exposure.
 - i. The Designated Official will send an email to all NARA employees who were in the facility in the 14 calendar days before the sick or exposed person was diagnosed or first experienced symptoms, or 14 days after she or he had close contact with a diagnosed person. The Designated Official will ensure that all CORs notify the vendor(s) of any contractor employees who were in the facility in the same 14 calendar day period.
 - ii. All notifications must protect the identity of the sick or exposed person. A sample notification is provided at the end of this document.
- c. If the sick or exposed person has been in the facility in the last two calendar days before she or he was diagnosed with COVID-19 or first experienced symptoms of COVID-19, or in the 14 days after she or he had close contact with someone who was diagnosed with COVID-19, the Designated Official must work with the appropriate supervisors or COR to take the following actions (in addition to the notifications in paragraph 4b, above):

- i. If the sick or exposed person identifies any individuals with whom she or he had close contact (in response to the question at 1.a.iii(3), above), those individuals *must* be placed on home isolation for 10 calendar days according to the procedure in paragraph 2, above.
- ii. If the Designated Official, supervisor, or COR knows of any other employee or contractor (not named by the sick or exposed person) who was within 6 feet of the sick or exposed person for longer than 15 minutes in the two calendar days before the sick or exposed person was diagnosed, first experienced symptoms, or was in close contact with someone diagnosed with COVID-19, those individuals *may* be placed on home isolation for 10 calendar days according to the procedure in paragraph 2, above.

5. Report the incident and your response to neeo@nara.gov.

- a. After sending the sick or exposed person home, arranging for cleaning, and notifying local staff, the Designated Official must report the incident to the Office of Equal Employment Opportunity (NEEO) at neeo@nara.gov.
- b. The Designated Official must report to NEEO any time an employee reports that she or he has received a COVID-19 diagnosis, is experiencing COVID-19 symptoms, or has been exposed to someone who has been diagnosed with COVID-19. This applies to any report by any employee, regardless of whether she or he is teleworking or is on site. The Designated Official must also report all employees who are placed on home isolation due to a workplace exposure, as described in paragraph 4c, above.
- c. At a minimum, the Designated Official or supervisor will provide the following information to NEEO. This includes both the initial sick or exposed person (see paragraph 1a, above) and any NARA employees or contractors who are placed on home isolation as a result of contact with that person (see paragraph 4c, above). NEEO may establish additional reporting requirements, as needed.
 - i. Today's date;
 - ii. Facility name;
 - iii. Name of individual;
 - iv. Individual's affiliation (e.g. employee, contractor);
 - v. Reason for being placed on home isolation (e.g. diagnosed with COVID-19, symptoms of COVID-19, close contact with someone who has been diagnosed with COVID-19, potential workplace exposure);

- vi. Reason start date (i.e. date the person was diagnosed, first experienced symptoms, came in close contact with someone who was diagnosed, or was notified of a potential workplace exposure); and
 - vii. Isolation start date (i.e. date the person first reports a diagnosis, symptoms, or close contact
- d. NEEO will collect data and maintain records of employees who are placed on home isolation due to COVID-19. NEEO will provide summary data (with names removed) to the Office of Human Capital (H) and the Security Management Division (BX) for internal and external reporting. Designated Officials, supervisors, and CORs should only maintain the minimum records necessary to support an absence, according to local procedures, without retaining health information of affected employees.

6. Sample notification message.

Dear Colleagues:

As the Designated Agency Official for the *[location]*, I am sending this email to inform you that an occupant of our building was recently diagnosed with COVID-19. The individual was diagnosed on *[date]*, but has not been in the building since *[date]*. You are on this email distribution because the sign-in record shows you were in the *[location]* between *[date range – 14 days back from when the sick or exposed employee was last in building]*.

The infected individual's movement in the building was primarily limited to *[define if possible or whole building]*. Those areas are closed and will be cleaned as soon as possible *[or already cleaned]*.

I am providing this for your information. You have not been identified as having close contact with this individual so there is no need to self-isolate. In the event you display any potential symptoms, please let me know, and you should reach out to your medical provider for guidance as deemed appropriate by them.

If you have questions about this notice, please contact *[yourself or someone you may delegate to]*

7. Sample script for placing an employee on home isolation:

Dear *[Contact Name]*, You were identified as having had contact with a person who has been diagnosed with COVID-19 or is experiencing symptoms of COVID-19 in our facility.

Because you have had contact with an infected person, you are being placed on “home isolation” for 10 calendar days. If you are not experiencing symptoms you may telework or you may be granted weather and safety leave, according to NARA policy.

If you become ill, please call your supervisor [*or me*] and seek medical attention. If you become ill you must take sick (or other personal) leave.

You may not be infected and, even if you are infected, you may not experience symptoms. Please take these home isolation seriously. There is guidance on CDC’s website on how to home isolate when in close contact with an ill person.

Please contact your supervisor [*or me*] if you have any questions.

8. References.

- a. Returning to work: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>
- b. Good overall site: <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>
- c. Close contact (< 6 ft and > 15 mins): <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>
- d. Notification standards: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>
- e. Cleaning standards: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>
- f. Three days for “record quarantine” is based on research by the IMLS project on Reopening Archives, Libraries, and Museums (REALM), which found that the virus that causes COVID-19 was no longer detectable after a quarantine of:
 - 3 days for plain paper (<https://www.webjunction.org/news/webjunction/test1-results.html>); and
 - 2 days for archival folders (<https://www.webjunction.org/news/webjunction/test2-results.html>).

Point of Contact: If you have questions or comments, please contact the Occupational Safety and Health Program Office at safety@nara.gov.