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COVID-19: Changing our path but not our practice...

Act in good faith, be consistent, and document.

## **ALERT**

### **Update 3/30/20 - Presumptive Positive or Positive Test; What Now?**

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This is hard stuff. While we don't want to cause panic amongst our employees, we also have the responsibility to provide a safe work environment. Now how do you do that? Be direct and be factual. A few tips are listed below for your consideration.

Upon receiving notice of a presumptive (most likely) positive case or actual positive test:

- Ask the ill employee to identify all individuals who worked in close proximity (within six feet) with them in the previous 14 days to ensure you have a full list of those who should be sent home.
- Send home all employees who worked closely with the ill employee for a 14-day period of time to ensure the infection does not spread. Don't forget to think through visitors, vendors, or customers who will also need notice.
- Send a notice to all employees about the potential exposure. (See sample [here](#))
- When sending the employees home, do not identify by name the ill employee or you could risk a violation of confidentiality laws. If you work in a shared office building or area, you should inform building management so they can take whatever precautions they deem necessary.

The CDC also provides the following recommendations for most non-healthcare businesses that have suspected or confirmed COVID-19 cases:

- If possible, wait up to 24 hours before beginning cleaning and disinfection.

- It is recommended to close off areas used by the ill person(s) and wait as long as practical before beginning cleaning and disinfection to minimize potential for exposure to respiratory droplets.
- Open outside doors and windows to increase air circulation in the area.
- Cleaning staff should clean and disinfect all areas (e.g., offices, bathrooms, and common areas) used by the ill person(s), focusing especially on frequently touched surfaces.

To clean and disinfect:

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection (Note: “cleaning” will remove some germs, but “disinfection” is also necessary).
- For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective.
- Diluted household bleach solutions can be used if appropriate for the surface. Follow manufacturer’s instructions for application and proper ventilation. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.
- Cleaning staff should wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash. (Gloves and gowns should be compatible with the disinfectant products being used as well as any additional PPE required based on the product).
- Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area. Be sure to clean hands after removing gloves.
- Employers should review policies for worker protection and provide training to all cleaning staff on site prior to providing cleaning tasks. Training should include when to use PPE, what PPE is necessary, how to properly don (put on), use, and doff (take off) PPE, and how to properly dispose of PPE.
- If you require gloves or masks or other PPE, prepare a simple half-page Job Safety Analysis (JSA): list the hazards and the PPE (gloves, masks, etc., as needed), and the person who drafts the JSA should sign and date it.
- **DON’T FORGET:** If employers are using cleaners other than household cleaners with more frequency than an employee would use at home, employers must also ensure workers are trained on the hazards of the cleaning chemicals used in the workplace and maintain a written program in accordance with OSHA’s Hazard Communication standard (29 CFR 1910.1200). Simply download the manufacturer’s Safety Data Sheet (SDS) and share with employees as needed, and make sure the cleaners

used are on your list of workplace chemicals used as part of the Hazard Communication Program (which almost all employers maintain).

This information and more can be found on our [website](#).

Be safe and be well.

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