

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: April 13, 2020

To: All General Managers
City of Los Angeles

From: Wendy Macy, General Manager
Personnel Department

Subject: **NOTIFICATION AND CLEANING PROCEDURES/GUIDELINES AND
FAQs RELATED TO COVID-19**



The health and well-being of our employees is of paramount importance to our City leaders. Every employee deserves a safe and supportive workplace. The Personnel Department's Medical Services Division (MSD), in conjunction with the City Attorney's Office and Department of General Services (GSD), has established the following notification and cleaning procedures, guidelines and FAQs, to assist Departments responding to positive cases of COVID-19 in the workplace. **Note:** Please check with LAPD for their internal process for cleaning and notifications.

In the event of a positive COVID-19 case, the following steps should be taken by a supervisor after becoming aware of a positive COVID-19 diagnosis of a City employee as a result of a test:

1. The supervisor should verify that the COVID-19 positive employee is no longer in the workplace.
2. The supervisor should immediately notify their HR section and provide the following:
 - a. A timeline of when the employee was last at work (which is critical for the custodial services crew to commence the cleaning procedure);
 - b. A list of coworkers the employee had close physical contact with up to 2 days before symptoms appeared. Close physical contact is defined by LA County Public Health as *being within six feet of a person who has, or likely has, COVID-19 for more than ten minutes, or unprotected contact with the bodily fluids and/or secretions of such person (such as being coughed on/sneezed on, sharing utensils or saliva or providing care), while not wearing appropriate personal protective equipment, including within 48 hours before such person's symptoms began.* Close physical contact does not include merely passing the diagnosed employee in a hallway, sharing the same office floor with the employee, or other incidental association.
 - c. The date the employee first began to experience symptoms (to the extent possible).
3. The supervisor should close off the employee's office or work station, to the extent possible.

4. The HR section should immediately contact the MSD for next steps. All positive COVID-19 cases must be reported, per the Mayor's Office direction, immediately to Joanne O'Brien and Deborah Caruso.
5. MSD will provide further guidance based on their clinical judgement, and CDC guidelines, dated April 10, 2020, on COVID-19 issues. MSD will also provide guidance on what sanitary measures need to be taken and by whom, if any, to Department Personnel Officers. GSD will follow the cleaning direction provided by MSD and Personnel.
6. MSD will also provide recommendations regarding what City employees, facility residents, or building tenants should be notified about a positive test result. If the diagnosed employee developed symptoms in the office, custodial staff who clean the diagnosed employee's work area should be notified immediately. In certain circumstances, GSD may also be instructed by Department Personnel Officers to notify all tenants of the floor or the building where the employee works, or make further notifications.
7. The employee's name cannot be disclosed in any notification, except to the Department's HR Section, LA County Health, the Center for Disease Control or through the Mayor's Office direction to report all positive cases to the Personnel Department's points of contact, Joanne O'Brien and Deborah Caruso.
8. Employees who test positive for COVID-19, and those who are told by a clinician they are presumed to be positive for COVID-19, are required by LA County Health Order to self-isolate for a period of 7 days and remain in isolation until after 3 days of being symptom free have passed. The order requires individuals in isolation to remain in their homes for the required period, except as needed for medical treatment.

Supervisors should consult with their Department Personnel Officer to discuss specifics and further guidance.

Below are FAQs to assist departments with commonly asked questions:

What is considered an "exposure" to a positive COVID-19 case?

An exposure is close physical contact with someone who has received a positive COVID-19 test or is likely to have COVID-19. Close physical contact is defined by LA County Public Health as being within six feet of a person who has or likely has COVID-19 for more than ten minutes, or unprotected contact with the bodily fluids and/or secretions of such person (such as being coughed on/sneezed on, sharing utensils or saliva or providing care), while not wearing appropriate personal protective equipment, including within 48 hours before such person's symptoms began. Close physical contact does not include merely passing an infected employee in a hallway, sharing the same office floor with the employee, or other incidental association.

Do we need to shut down and disinfect the entire floor where the employee worked?

No, it is not necessarily, as long as the employee's primary work area, key common areas, and frequently touched areas are disinfected using products approved by the EPA for eliminating or killing the virus on surfaces by GSD Custodial or the contractor. This cleaning should be done after regular business hours or at the end of the day (if possible). Employees should not remain in the area while the disinfecting is being completed.

The virus is not viable on surfaces after 3 days. Routine cleaning using products approved by the EPA for eliminating or killing the virus on surfaces will be provided by GSD Custodial or the contract vendor.

What cleaning steps should be taken when someone in the workplace tests positive for COVID-19?

Upon confirmation of a COVID-19 diagnosis, a supervisor should isolate the area where the sick employee was normally present and contact the department's administrative services group who will work with the Departmental Personnel Officer to determine sanitary measures.

Typically, the affected areas, along with key common areas (such as bathrooms and lunch rooms) and frequently touched areas (such as main doors and elevator buttons) will be disinfected using products approved by the EPA for eliminating or killing the virus on surfaces by GSD Custodial or contractor. After the sick employee has left the workplace, CDC recommends before beginning cleaning and disinfection, to wait 24 hours or as long as practical.

In some cases, MSD may recommend a cleaning protocol that requires the custodial or contract crew to provide the service using full PPE (Personal Protective Equipment). MSD will provide departments and GSD guidance through the Personnel Department Officer on what sanitary measures should be taken and on necessary notifications.

Do we need to disinfect the work areas if the employee who tests positive for COVID-19 is not actively in the workplace?

It depends. If the employee was in the workplace within the previous 3 days, then that person's primary work area, along with key common areas and frequently touched areas should be disinfected using products approved by the EPA for eliminating or killing the virus on surfaces by GSD Custodial or the contractor. This cleaning should be done after regular business hours or at the end of the day (if possible). Employees should not remain in the area while the disinfecting is being completed.

The England Journal of Medicine has stated if by the time of the positive test result the employee has been absent from the workplace for more than 3 days additional cleaning and disinfection will not be necessary. MSD will provide departments and GSD guidance through Personnel Department Officers on what sanitary measures should be taken and necessary notifications.

Are leased buildings also following the cleaning procedures?

We will work closely with all leased buildings to ensure they are following the established guidelines. For example, CBRE has advised that they provide a day porter who uses a disinfectant to wipe down common areas and high touch spots such as elevator buttons on a 4 hour rotation throughout the building so each location is disinfected twice a day. They are also disinfecting every night using their night crew on every floor.

If a symptomatic employee tests negative, but they are still sick, should they continue to use Timecode 19 or use SK time?

Timecode 19 was created to compensate employees who are or may be infected with COVID-19. Once a test is administered to a symptomatic employee and comes back negative, the employee should be off on his/her own SK time.

Can I ask an employee if they have tested positive for COVID-19?

No, not necessarily. Employers can ask an employee how he or she is feeling in general but should not inquire about a specific illness as that could rise to the level of a disability related inquiry under the ADA. If you have any concerns, please discuss with your HR Section for guidance.

How can employers tell the difference between allergies and COVID-19, and when should workers be sent home?

While the symptoms of hay fever include sneezing, runny or stuffy nose, and itchy eyes, according to the Mayo Clinic, the symptoms of coronavirus include fever, cough and shortness of breath, according to the Centers for Disease Control and Prevention (CDC). Hay fever also can cause coughing, according to [Harvard Medical School's Harvard Health Publishing](#).

Employees should be sent home if they exhibit any of the symptoms of the coronavirus and allowed to telecommute, if possible, and if not, placed on paid administrative leave. Please discuss with your HR Section for guidance.

Can we take employees' temperatures before they enter the workplace?

Generally, measuring an employee's body temperature is a medical examination. Because the CDC and state/local health authorities have acknowledged community spread of COVID-19 and issued attendant precautions, employers may measure employees' body temperature. However, employers should be aware that some people with COVID-19 do not have a fever.

Does family and medical leave apply to absences?

Yes. Regular FMLA provisions continue to apply for personal illness and/or family illness, including caring for family members.

Is the City complying with the new federal legislation Families First Coronavirus Response Act (FFCRA) which is effective on April 1, 2020?

Yes, for information on how the City is complying with FFCRA, please use [this link](#).

Do we need to report positive COVID-19 cases to Cal/OSHA?

Each department has a Cal/OSHA reporting requirement for a positive test result for COVID-19 when a City employee is exposed through their employment. The reporting requirement arises when it can be determined that the exposure to the virus was work related. Under circumstances where the exposure was work related, the City is required to report the incident within twenty-four (24) hours after the City is made aware of the employee's medical treatment or hospitalization.

If an employee has a confirmed (positive test) case of COVID-19 that is considered work-related, an employer must report the case to Cal/OSHA if it results in a fatality or in-patient hospitalization of one or more employees. It is important to note, however, that the reporting obligation is time limited. Thus, if a fatality due to COVID-19 occurs after 30 days from the workplace incident leading to the illness, an employer is not required to report it. Similarly, if the in-patient hospitalization occurs more than 24 hours after the workplace incident leading to the illness, an employer is not required to report. In-patient hospitalization, for purposes of COVID-19, includes when the City or a health care agency requires an employee to isolate from work (as opposed to self-quarantine).

As of April 10, 2020, however, reporting guidelines differ for workers who are not in the healthcare industry, emergency response organizations, (e.g., emergency medical, firefighting, and law enforcement services) and correctional facilities; while workers in these categories must continue to make work-relatedness determinations under the normal regulations, until further notice, OSHA will not enforce existing regulations requiring employers to make work-related determinations, except where:

1. There is objective evidence that a COVID-19 case may be work-related. This could include, for example, a number of cases developing among workers who work closely together without an alternative explanation; *and*
2. The evidence was reasonably available to the employer. Examples of "reasonably available" evidence include information given to the employer by employees, as well as

information an employer learns regarding its employees' health and safety in the ordinary course of managing its business and employees.

Is COVID-19 testing available?

Yes, Mayor Garcetti announced the expansion of a free testing program. Now, any resident of L.A. County with [symptoms of COVID-19](#) can schedule a test. We are no longer limiting tests to the highest-risk populations, but priority for same day or next day tests will still be given to symptomatic individuals with underlying health challenges, people over 65 years old, health care professionals, and first responders.

To check your eligibility and make an appointment, go to coronavirus.LACity.org/testing.

What else can we do to protect our employees?

On April 1, Mayor Garcetti issued new guidance on the importance of wearing non-medical cloth face coverings in public. Face coverings are another way to limit the spread of respiratory droplets that may be infected with COVID-19. City employees should voluntarily comply with the Mayor's request and wear a face covering when coming in to work. Face coverings are strongly recommended as they may provide an extra layer of protection.

As an added reminder, encourage employees to take proactive measures to avoid being exposed to the virus including: frequently wash your hands with soap for 20 seconds; avoid close contact with people; stay home if you are sick; cover coughs and sneezes; and clean and disinfect surfaces often.

Also, all employees should be reminded to refrain from touching any centrally-located items (such as elevator buttons, counters, doors, etc.). Employees should not be touching these items with their bare hands and as an example, should instead use their elbows.

Additional resources are available on the Centers for Disease Control and Preventions and Los Angeles County, Department of Public Health websites.

- <https://www.cdc.gov/>
- <http://publichealth.lacounty.gov/>

If you have any questions, please contact Joanne O'Brien, Medical Services Division, at joanne.obrien@lacity.org or Deborah Caruso at deborah.caruso@lacity.org.