

# Steps if an Employee Tests Positive for COVID-19 or There has Been an Employee Exposure

*Work in tandem with your leadership team, human resources and compliance departments*

- ❑ **Instruct the infected employee to stay home for at least 14 days and encourage them to self-quarantine during that time.** Credit unions should encourage their employees to contact a qualified health care provider to determine whether a 14-day self-quarantine is sufficient, depending on the particular facts and circumstances. Employees must also be symptom (particularly fever) free for 72 hours before returning to work.
- ❑ **Ask the infected employee to identify all coworkers, vendors, or others and areas within the office that they may have come in contact with at least 14 days prior to when they tested positive.** This will ensure employees who worked with the individual are aware and self-quarantine if possible or get tested. This also helps the credit union know what areas within the building should be professionally cleaned and sanitized.
- ❑ **Contact the employees identified by the infected employee.** Do NOT tell them the name of the infected employee or provide any clues as to who the infected employee could be (for example their department, job title, work location, etc.). Advise them an employee that has been physically present in the office has tested positive for COVID-19, and out of an abundance of caution, the employer is requesting that they do not present to the office for at least 14 days.
- ❑ **Assure the infected employee that he/she will not be identified by name to their co-workers** as having contracted the virus in accordance with the Americans With Disabilities Act (“ADA”). However, some employees may want you to provide more information to assist their co-workers, vendors, and others. Coordinate with the employee or communication if the employee consents to more detailed communication document that consent in a memo or note to file.
- ❑ **Be honest and transparent with your employees.** Without disclosing the infected employees’ identity, advise your employees an individual that has been physically present in the office during the prior 2 weeks has tested positive for the virus or has been exposed.
- ❑ **Remind employees that discrimination or harassment against individuals that are suspected to have tested positive for, or been exposed to, coronavirus, is unlawful and strictly prohibited.** Remind them that speculation or social media can lead to employees being bullied or trolled as well as a violation of privacy.
- ❑ **Depending on the size of your office and the exposure potential credit unions may consider shutting down their office(s) completely for 14 days (or more depending on the circumstances)** and allowing employees to stay at home and, if possible, work remotely. Risks may also be minimized by have the credit union thoroughly cleaned and opening drive troughs only and the use of PPE. If you close your branch, even temporarily for cleaning, you will need to notify the Division.
- ❑ **Please review the CDC guidance on business response and cleaning the branch:**  
<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html> It may ease the mind of staff to have it professionally cleaned if possible.

- ☐ Please remind the employee who tested positive for COVID-19 that a doctor's note stating they are fit for duty is required before they are permitted to return to work.
- ☐ Encourage everyone to contact Human Resources with questions or concerns.
- ☐ Sample member and media communication can be found [here](#).

Credit unions should communicate transparently with members. The decision on how and when to communicate will depend on the situation. An employee who tests positive may be different than an employee who may have been exposed.

**ICUL encourages you to seek advice from an attorney and/or the Iowa Department of Health as every situation is different.** ICUL can refer the credit union to an employment attorney for further review and guidance.

*This situation, including the response by the state and federal government, continues to change rapidly. The content is based on information known at the time of posting and may not have yet been updated at the time you view it, so we strongly recommend that you regularly check the resources sent out. Content provided by ICUL is for educational and informational purposes only and is not legal services, legal advice or in any way establishes an attorney-client relationship. Readers should consult an attorney to understand how this content relates to their individual situation.*