



Wine Industry Sample Protocols:

Employee Management Policies for “Close Contacts” with COVID-19 Cases

In these challenging times, it is important for wineries and affiliated businesses to be prepared to appropriately respond when a workplace is impacted by the novel coronavirus, or COVID-19. This is one of a series of recommended policies prepared by Wine Institute for use by wineries and affiliated businesses to appropriately respond when their workplace is impacted by cases of COVID-19.

The Centers for Disease Control and Prevention (CDC) and other governmental authorities have released guidance on how employers should respond to situations where the employer is notified that one or more employees have been “in close contact” with an individual who is diagnosed or has a positive COVID-19 test. Below, we summarize CDC’s guidelines on how to handle the situations.

We are aware that some companies will not be able to adopt all recommendations outlined in this document. Please note that the information in this document is relevant to the date on which it was last revised and that employers should confirm that it is still current at the time of use. This document is to be used as guidance only and is an evolving document.

The following are strong recommendations generally based on guidance from federal agencies, including CDC, OSHA, and EEOC. In some states and localities, some of these recommendations may be mandatory. Check with local officials for details about their public health emergency orders and requirements.

See CDC guidelines on contacts and patients:

www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html

Who is in “close contact” as defined by CDC?

- The CDC defines “close contact” as either
 - Being within approximately 6 feet of the individual with COVID-19 for a prolonged period of time.
 - In the same work area, break room, meetings, or similar circumstances for prolonged periods.
 - Living with, visiting, or caring for a person who is ill with COVID-19.
 - Unprotected contact with the infectious secretions of COVID-19 (i.e., direct contact with droplets from cough or other body fluids). If an employee leaves the workplace after experiencing symptoms while at work, employees who use the same equipment or workstations for prolonged periods should be considered “close contacts.”
- “Prolonged period” is currently undefined. CDC notes that data are insufficient to precisely define the duration of time that constitutes a prolonged exposure. Recommendations vary from 10 minutes or more to 30 minutes or more. In part it depends on the circumstances of the contact. Being in a meeting room with low ceilings and limited ventilation, even if separated by the required 6 feet or more, for more than 10



minutes may be considered a prolonged period. In contrast, working on a production line where the physical space is more typical of manufacturing facilities, with 15-20 foot ceilings, mechanical ventilation meeting recommended standards, more than 6 feet spacing between workstations for an hour may not be sufficient to put the employee in the close contact group. Some authorities have suggested periods of contact of ten minutes or greater, depending upon the degree of contact.

- Employers may need to adjust the length of time depending on the degree of interaction employees must experience to carry out their tasks, the physical conditions in the workplace, and similar considerations. Note also that events may be cumulative; several meetings in a single day in a low ceiling meeting room may qualify, as could an aggregate of meetings, close proximity at workstations, or any other circumstance where the employees may be within a space as a group for more than a few minutes. In the end, there are so many variables that each employer's situation may require a case-by-case assessment.
- For any employee deemed to be a close contact, the employer should either:
 - Send those employees home with directions to self-quarantine for 14 days. Any employee subjected to those directions should be permitted back only if, during the entirety of those 14 days, he or she has had no symptoms associated with COVID-19, including cough, shortness of breath, fever, sudden acute loss of taste or smell, or body aches without using either prescription or over-the-counter medications. Employees reporting symptoms while in self-quarantine should be treated as presumed COVID-19 positive, continue to stay at home to isolate, seek medical attention, and be allowed to return to work only if they satisfy the criteria for those individuals.
 - Or, if an employer is willing and able to conduct full screenings, including taking a temperature pre-shift, a close contact employee may remain at work if:
 - The employee remains asymptomatic;
 - The employer conducts the pre-shift screening, which includes measuring the employee's temperature and assessing symptoms associated with COVID-19 prior to the individual starting work;
 - The employee self-monitors, including temperature, for 14 days outside of work;
 - The employee wears a mask at all times while in the workplace for 14 days after last exposure;
 - The employee maintains proper social distancing (over 6 feet) while at work;
 - The employer disinfects and cleans workspaces such as offices, bathrooms, common areas, and shared electronic equipment routinely; and
 - The employee is sent home immediately if they begin to show symptoms associated with COVID-19. At which point it is also necessary for the employer to assess whether any other employees were in close contact with the individual at any time in the previous 48 hours.
- Employers should emphasize maintaining sufficient separation between employees in all circumstances. Outside meetings can be considered as long as distance is maintained.



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Wine Institute is a private, non-profit trade association of wineries and associate members engaged in industries related to wine production and distribution. In an effort to increase health and safety awareness amidst the COVID-19 crisis and to improve health and safety practices at Wine Institute member sites, Wine Institute is proud to offer these exemplars of health and safety best practices related to the COVID-19 crisis. The exemplars offer a series of general best practices related to COVID-19 which were drawn from guidance from federal agencies, including CDC, OSHA, and EEOC, and consultations with an OSHA lawyer and infectious disease doctor.

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Contact Information

All communications relating to the health and safety exemplars related to COVID-19 should be directed to Wine Institute's legal team at legal@wineinstitute.org.