To help your organization respond to questions surrounding COVID-19, we have provided the following risk management recommendations and steps to reduce your legal exposure while continuing operations during the COVID-19 outbreak:

1. **Property Risk Management Recommendations:** Consider implementing additional risk and safety measures at any of your facilities that may be idled in response to the COVID-19:
   
a. Verify alarms are in service and the building is secure  
b. Verify adequate heat is maintained in all areas  
c. Verify all fire protection systems remain in service

2. **Staff COVID-19 Infection Notification Risk Management Recommendation:** To help your organization respond to questions on providing notice to your staff in the event one of your employees tests positive or exhibits symptoms of COVID-19, we have provided the attached template COVID-19 Staff Notification Letter. As a best practice, this notice should be provided to your staff within 24 hours of becoming aware that one of your employees tests positive for COVID-19.

Your Graham Service Team is available to assist you in helping with risk management best practices to help protect your employees and your organization and to support your efforts in Crisis Management and Business Continuity.

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**Template Letter Notifying Employee Staff of COVID-19 Employee Infection**

(Edition date: 4.10.20)

[DATE]  
[NAME]  
[ADDRESS]  

To our valued employees:

Today, we learned that one of our employees [has tested positive/is exhibiting symptoms but has not yet been able to be tested] for COVID-19 (2019 novel coronavirus). This individual was last in the office on [DATE], and therefore the last known potential contact for our employees with this individual was [#] days ago. The employee works [describe the area/floor/department where the employee works while keeping the employee’s identity private as best you are able.]

We have reached out directly to those employees whom we are aware of that were in “close contact” with the impacted employee which is defined by the CDC as “being within approximately 6 feet of a COVID-19 case for a prolonged period of time” and instructed them to self-quarantine at home (unless the employee is a critical infrastructure worker, as defined by the CDC and/or your governor, in which case the person may continue to work following the potential exposure if certain precautions are taken. See [CDC’s new guidelines](https://www.cdc.gov/coronavirus/2019-ncov/worksafety/healthcare.html) for critical infrastructure workers who have been exposed to COVID-19).

Your safety is our top priority during these circumstances. We have consulted the Centers for Disease Control (CDC) resources [Note: See attached appendix of CDC Guidelines for Various Businesses & Industries] available to date, and as such, will be taking the following precautions:

[1]
1. The impacted area of our facilities will be temporarily closed and will be cleaned in a manner consistent with the CDC guidelines and [copy link for State Health Department of location of positive test/suspected case]. We will notify you when this has been completed. [See note 1 below]

2. While most employees were not in close contact with the individual, we recommend that all employees take the precautions noted by the CDC at this site for those exposed through close contact. These include:
   a. Monitor your health symptoms which include a fever (over 100.3°F), cough, shortness of breath
   b. If symptoms develop, self-quarantine and call your healthcare provider
   c. Practice social distancing
   d. Wash your hands frequently and avoid touching your face

While we understand that this may cause concern for you, we want to assure you that we are taking every precaution possible and care about your health and the health of your families. Please do not hesitate to reach out to your manager or me (at the number below) if you have any questions or if you develop symptoms or are tested for COVID-19.

[EMPLOYER STAFF SIGNATURE]
[BE SURE TO INCLUDE CONTACT NUMBER AS NOTED IN LAST PARAGRAPH ABOVE]

[Footnote 1: The determination of when and whether to close a location is a highly unique determination based on a broad range of factors which would include: 1. Whether you are subject to any federal, state or local orders to close; 2. Whether the infected person is suspected to be infected or confirmed to be infected; 3. whether those impacted by the infected person were in close proximity to the infected person and whether the contact was continuous or intermittent; 5. Whether the employees impacted are at higher risk (older workers or those with respiratory illnesses for example); 4. Whether your workforce is capable of working from home. This determination should be made with the assistance of your outside counsel who is familiar with employment practices issues and the latest CDC guidelines.]

Appendix - CDC guidelines for Various Businesses and Industries:
Senior Housing not Nursing Care

Some states and cities may have even more stringent guidance than the CDC, so we also recommend reviewing the applicable local government guidance at websites such as these:
1. PA’s official website - https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx
2. NJ’s official website & resources - https://www.nj.gov/health/cd/topics/ncov.shtml
3. NYC’s official website - https://coronavirus.health.ny.gov/home