

# Contact tracing considerations

Last updated June 5, 2020

## Contact tracing requirements

The NY Forward guidance requires that organizations participate in contact tracing with the local health departments in wherever they have worksites. Specific requirements related to contract tracing include:

1. Notifying the health department about any positive tests
2. Notifying the health department of any individual who was in the building in the 48 hours before the individual first experienced COVID-19 symptoms or tested positive, whichever is earlier.
  - a. The health department will work to contact those individuals and determine who needs to quarantine or isolate
3. Maintaining a log of every person who may have close contact with other individuals at the worksite
  - a. Log should include everyone except delivery workers in proper PPE
  - b. When possible individuals should sign the log with their OWN pen
  - c. NY Forward states that best practice includes collecting contact information for individuals in the log
4. Designating an individual to maintain the log and contact the health department (should also be the person who maintains attestations related to COVID-19 screenings).
  - a. The organization may designate a single point of contact for each day, shift, etc.

*Note: Staff are required to self-report to their employer if they are contacted by the local health department as part of a contact tracing investigation.*

## Considerations for contact tracing

1. Reviewing camera footage is one of the easiest ways to determine where an individual was in the building and who they had contact with.
  - a. Knowing when the person entered the building can help reduce the time intensiveness of these measure
  - b. In addition to using program staff, having staff who complete Justice Center reviews assist with this task can ease the burden. These individuals are likely very familiar with reviewing camera footage.
2. For tracing staff, reviewing outlook calendars and scheduling systems can help in addition to interviews.
3. Other sources for tracing who was in the building include reviewing logs, timesheets, and key fob logs.
4. Limiting outside visitors and the number of employees/clients in buildings when possible can make this process easier.

## 42 CFR & contact tracing

1. Local government requests for the identity of patients in SUD treatment for contact tracing CANNOT be given without the patient's consent.
2. SUD treatment programs should consider collecting consents or modifying their current consent to allow them to release this information to the health department.
3. Organizations should review HIPPA 42 CFR requirements as they relate to contact tracing with their compliance staff and/or legal counsel.

## Additional Resources

1. New York State Department of Health. (2020, May 28). Interim guidance for office-based work during the COVID-19 public health emergency. See: <https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/offices-interim-guidance.pdf>
2. New York State Department of Health. (2020, April 8). COVID-19 update for local health department (LHD) contact investigations. See [https://coronavirus.health.ny.gov/system/files/documents/2020/04/doh\\_covid19\\_lhd\\_contacttracing\\_040820.pdf](https://coronavirus.health.ny.gov/system/files/documents/2020/04/doh_covid19_lhd_contacttracing_040820.pdf)
3. New York State Department of Health. Guidance on the contacts of a close or proximate contact of a confirmed or suspected case of COVID-19. See: [https://coronavirus.health.ny.gov/system/files/documents/2020/03/contacts\\_of\\_contacts\\_guidance.pdf](https://coronavirus.health.ny.gov/system/files/documents/2020/03/contacts_of_contacts_guidance.pdf)

Please note: Any documents shared by CNY BHCC to respond to the challenges of COVID-19 are prepared based on the information available at the time of creation and are offered to assist our partners in combating this pandemic. It is each organization's responsibility to do their own due diligence if using other's documents and ensuring documents are based on most recent guidance. Any documents used should be reviewed by your own teams/counsel to ensure you are meeting your own regulations and standards. CNY BHCC and/or creators of shared resources shall not be held responsible for the use of their documents by partners. Please continue to utilize resources provided by CDC, NYS DOH, NYS OMH, NYS OASAS and NYS OPWDD.