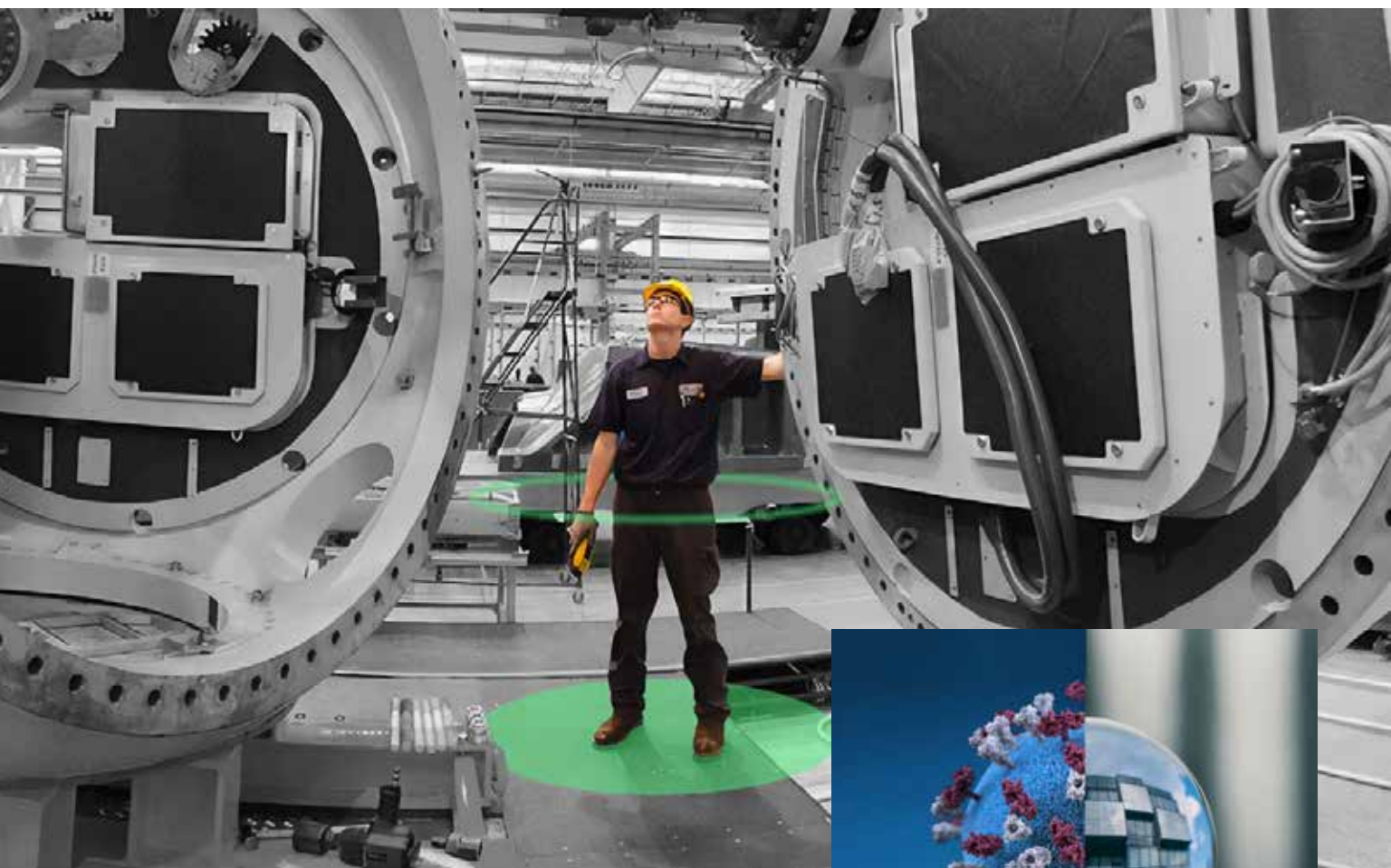


An Employer's Guide to Workplace Safety in the Age of COVID-19

Contact Tracing, Social Distancing, and Privacy Considerations and How FastSensor's **ADAM** Can Help



 **FastSensor**

Measuring indoor journeys for ROI and safety

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Introduction

We're living in an unprecedented time. COVID-19 continues to wreak havoc globally and will continue to do so for the foreseeable future, up to and possibly beyond the point that a vaccine is developed. In response to the pandemic, many businesses have responded by requiring their employees to work from home. However, that's impossible for many companies.

Grocery stores, clothing retailers, shopping malls, restaurants – the list of businesses that cannot operate on a remote-work model is incredibly long. To remain in business and provide employees with an income, those companies must continue to operate following an on-premises model. That puts employees, vendors, suppliers, and customers at risk.

Thankfully, employers have tools, procedures, and processes available that can help to prevent the spread of COVID-19, protecting their employees, customers,

and others who might set foot inside the business. Social distancing, requiring face masks to be worn at all times, plexiglass shields installed at registers, and contact tracing – these are just some of the ways that we can at least slow the virus's spread.

Three of the most challenging aspects for employers are contact tracing, handling the privacy and confidentiality issues that stem from contact tracing and enforcing social distancing. However, these are among the most crucial things to get right. In this eBook, we will explore contact tracing, its operation and implementation, how to handle privacy and confidentiality issues, and more.

We'll also explore how FastSensor's ADAM (Active Distance Alert and Monitoring) system can help you create a safer, healthier workplace for your employees and customers.

CHAPTER 1

Contact Tracing: An Employer's Guide

In the fight against COVID-19, employers must take many precautions. Social distancing is certainly one. However, contact tracing is also important and, for many employers, less understood and implemented.

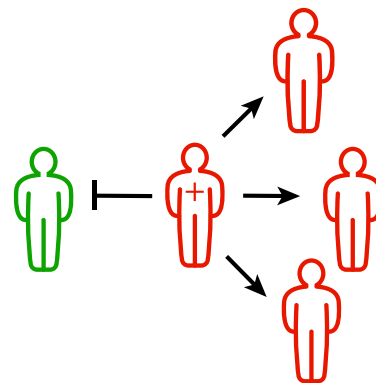
What is it all about? How should employers handle contact tracing? How does it impact privacy within your business? We'll discuss these topics and more in this chapter.

What Is Contact Tracing?

Contact tracing is nothing more than identifying anyone who a COVID-19 positive employee, vendor, or supplier might have had contact with and notifying them of potential exposure to COVID-19. That individual should then see their healthcare provider, self-quarantine at home, and alert others with whom they have been in contact.

The [CDC](#) explains it this way: "In general, contact tracing involves identifying people who have an infectious disease (cases) and people who they came in contact with (contacts) and working with them to interrupt the disease spread."

In the past, contact tracing was primarily handled by public health agencies and healthcare organizations. However, because of the ease of transmission and sheer spread of COVID-19, employers must step up and do their part. It takes only one COVID-19 positive employee to infect the entire workplace, so implementing contact tracing within your organization can have powerful benefits.



What Benefits Does Contact Tracing Offer?

If contact tracing involves known positive COVID-19 tests, what benefits might you as an employer see from contact tracing? Actually, there are quite a few that go well beyond what a positive test result can deliver.

- Helps break the chain of transmission (limiting COVID-19's spread).
- Helps identify and communicate with those who may have been unaware of their exposure to COVID-19.
- Helps educate people infected with COVID-19 about how to avoid spreading it and how to care for themselves and others.
- Helps those exposed to or infected with COVID-19 find resources during self-quarantine or isolation.

As you can see, contact tracing is a critical step that can have a profound impact on the virus' spread. However, it should not be seen as a cure-all. Contact tracing:

- Cannot stop asymptomatic spread (because it relies on positive tests and

the presence of defined symptoms of the disease).

- Does not work retroactively - time is of the essence, and contact tracing must occur quickly for it to be effective.
- May create privacy issues if employers are not careful in implementation and other steps in the process.

How Does Contact Tracing Work?

Contact tracing sounds complicated, but it's relatively simple. We've outlined the basic process below:

- An infected employee displays symptoms and tests positive for COVID-19.
- You ask the infected person about the people with whom they've come into contact, including other employees, customers, and those outside the workplace.
- Anyone the employee has come into contact with during the 48 hours before symptoms appearing must be notified. Unfortunately, most people can't remember everyone they've come into contact with.

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- Those people take action by seeking treatment with their healthcare provider, self-quarantining, and monitoring themselves for symptoms.

Businesses need a reliable solution to help them overcome the complications of contact tracing. That's where FastSensor comes in.

How Can Employers Handle Contact Tracing?

While contact tracing might be simple in theory, it can be challenging in practice. Given the immense spread of the virus

and the limited resources of healthcare organizations and government agencies, it falls on employers to create, enforce, and follow contact tracing policies and procedures. What should those consist of, though?

- Maintain accurate, up to date attendance records for all employees in all departments.
- Maintain records of all suppliers, vendors, and other business partners who visit the premises.



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- In office environments, maintain a seating chart highlighting who sits where so that more accurate contact tracing can be implemented.
- Create a contact tracing team that will be responsible for liaising between the business and government agencies/healthcare agencies, as well as interviewing employees, and then notifying any contacts.
- Have a plan for COVID-19 testing. Where will symptomatic employees go for testing? Should they go to a local city/county testing site? Should they use their preferred healthcare provider? Will you accept self-reported test results, or do you require healthcare provider corroboration/test result delivery?
- Take steps to identify symptomatic employees. This can include temperature checks on entering the premises and more.
- Proactively interview employees who are symptomatic and/or have tested positive for COVID-19. Interviewers will need to ask for personal information to identify and then communicate with contacts, including the following:
 - Name of those exposed
 - Contact information
 - Date, time, and duration of exposure
- Notify employees, vendors, suppliers, and contacts in an employee's personal life who may have been exposed. Note that the employee who tested positive should not be named.
- Maintain a record that you made the contact tracing effort, and keep this information confidential and separate to prevent unauthorized access.

While contact tracing cannot stop the pandemic by itself, it can slow transmission and prevent others from getting sick through unknowing exposure to COVID-19 positive employees. However, there are some potential privacy concerns involved, and we'll discuss those in the next chapter.



CHAPTER 2

Privacy Considerations with Contact Tracing

Contact tracing requires sharing information that an employer may or may not ordinarily have a right to access. Some employees may feel uncomfortable sharing this information. Others may balk, citing a legal precedent. These situations are understandable but avoidable. In this chapter, we'll discuss privacy laws and what you need to know as an employer.

What's the Issue?

At issue here is employer access to sensitive information that they may or may not have a right to under the law. Numerous state and federal laws are at play here, including the CCPA, CMIA, and, in some cases, the EU's GDPR legislation. These laws are designed to protect an individual's privacy and limit access to PII or Personally Identifiable Information. Think Social Security numbers, banking information, and even email addresses and other sensitive data.

What Does the Law Say?

Unfortunately, our system of data privacy laws was not designed with a pandemic

in mind. It's largely cobbled together from multiple separate laws. However, most government agencies like the California Department of Fair Employment and Housing and the EEOC have offered guidance that relaxes personal privacy laws so that employers can access this information for legitimate use without violating an employee's privacy rights.

Essentially, we have a set of scales. On one side, you have business needs. On the other, you have individual privacy. Under the law, as business need rises, individual privacy lowers.

It all comes down to "legitimate business need". If there is a legitimate need for a business to have access to personal information, then the employee's privacy

rights are not violated. This is how on-site temperature checks and employer-provided COVID-19 tests are legal (because they're technically considered medical tests).

Does HIPAA Apply?

The Health Insurance and Portability Accountability Act (HIPAA) protects patient healthcare information. However, it does not usually apply in an employer/employee situation. HIPAA governs how specific covered entities (healthcare providers, healthcare information clearinghouses, health plans, and any business partners) handle this data. Unless you are a covered entity, then HIPAA plays no role in employee information privacy.

What about the Americans with Disability Act?

The ADA doesn't apply in this situation. All employers have a right under the law to ask employees if they have symptoms or if they have been diagnosed with COVID-19. Likewise, the ADA does not apply to wearing face masks during a pandemic, social distancing, or contact tracing.

What Should Employers Do When Collecting Personal Information?

While you may be able to access an employee's personal information as an employer with a significant business need (stemming the transmission of COVID-19), that doesn't mean you have carte blanche here. Instead, businesses should follow specific rules regarding data storage, collection, and use. We've summed these up below:

- Given the increase in transparency requirements when it comes to consumer protection laws, it is good practice to provide notice to all employees at the time of data collection.
- You should disclose all types of data that you collect and why it is being collected. For instance, you require the names of any employees the individual came in contact with during the 48 hours before the appearance of symptoms so that they can be notified and receive medical care.
- For any personal information you seek, make sure you provide adequate disclosures as well as seeking consent from the employee.

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- Any information obtained, particularly medical information, must be kept confidential. This information should be accessible only to those with a demonstrable “need to know”. Make sure you have a plan in place on how to maintain confidentiality.
- Create and maintain policies that define what information is collected, why it's needed, where it's stored, how long it is stored for, who has access to it, and what security precautions are in place.
- Disclose any third parties that may have access to PII or medical information and why the information is being shared with those entities.
- Provide information to employees explaining all of the above in plain language, as well as how these practices will keep them safe and create a healthier workplace.

In addition to the steps above, you should assure your employees of the following:

- All information they provide will be used for the express purpose of contact tracing.
- Their name will not be shared with anyone, even if the contact asks for it.
- No judgments will be passed based on any of the information they provide.
- If they have questions, they are free to ask, and you (the employer) will do your best to answer accurately.

Confidentiality and information protection are serious considerations in contact tracing. However, with effective planning and some simple steps, you can trace contacts while still safeguarding employees' personal and medical information.



CHAPTER 3

Social Distancing and Your Business

While contact tracing is perhaps the most challenging issue covered in this eBook, we need to mention social distancing. With appropriate social distancing within your business, you add another layer of protection, help prevent the transmission of COVID-19, and create a healthier place for employees, vendors, suppliers, and your customers.

Social Distancing Basics

It's important to understand that every business is different. Your unique floorplan and even the industry in which you operate will affect how you implement social distancing. However, some common guidelines should be followed in all business settings to help reduce COVID-19 spread. We've listed these below:

- **Limit Crowds:** All businesses fall under some crowd mitigation rules. Know what your state government has mandated and follow those requirements at all times. Note that this can be challenging, particularly in retail settings where traffic congestion can occur very easily.
- **Space:** Those not part of the same group should stay at least six feet apart at all

times. Set up your facility to help ensure that this is possible.

- **Monitor Those Coming and Going:** You must be able to monitor the number of people entering and leaving the business. Not only is this important for crowd control, but also contact tracing.
- **Groups:** Social distancing only applies to those not part of the same groups. However, it can be challenging to always tell which customers are part of which groups and enforce social distancing mandates.

Accurate social distancing will help reduce the spread of COVID-19, but also lightens your burden when it comes to contact tracing. After all, if everyone is appropriately social distancing, there is less concern about contact with an infected individual.

CHAPTER 4

FastSensor's ADAM Solution

At FastSensor, we understand the importance of keeping your business running while also protecting employees. We truly are all in this together. Realizing that we were uniquely positioned to develop a solution that helps support social distancing while making contact tracing simpler, we developed ADAM – our Active Distance Alert and Monitoring system.

What Does ADAM Do?

ADAM is designed from the ground up to achieve mission-critical goals for businesses in all industries. It helps to build confidence and trust by creating a healthier, safer environment for everyone. We harnessed our industry-leading, AI-powered, journey monitoring software, and transformed it into a solution for keeping your customers safe.

ADAM solves critical challenges and delivers essential capabilities, including:

- Monitor customers entering and leaving the premises.
- Delivers real-time user and management alerts to indicate proximity violations.
- Requires absolutely zero Personally Identifiable Information (PII).
- All data is completely secure and protected from prying eyes.
- Get up-to-the-moment data on customer proximity to help enforce social distancing.
- Real-time, vibrating alerts warn when users violate the 6-foot social distancing protocol.
- Get accurate information about congestion and customer concentration, not just capacity-related data.
- Social distancing and contact tracing managed safely, securely, and responsibly.

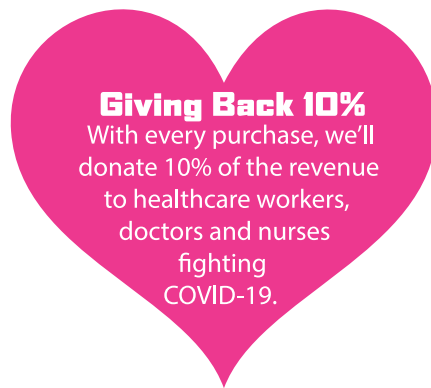
- Utilizes wearables that integrate with your employees' routines and work online and offline.
- Get notifications of escalating congestion/crowds so you can act immediately.
- Configure alerts to suit your unique business structure, customer flow, and other needs.
- Relies on radio frequency dissipation gradient, meaning no opt-ins and no need to download anything for your customers.
- ADAM represents an investment in safety today that serves as an investment in data-driven solutions for tomorrow.

Additionally, ADAM represents a powerful leap forward in terms of flexibility, allowing the system to be configured for virtually any space and any requirements. It is completely customizable and can be built around your goals, needs, and budget.

Ultimately, ADAM helps you create a safe place for employees and customers. It helps you enforce social distancing, and makes contact tracing simpler and easier. It's about eliminating guesswork and ensuring that everyone is following the rules. After all, that's the only way we're going to make it through this.

At FastSensor, we also believe in supporting those who go the distance for all of us – our healthcare workers. With every purchase of our ADAM system, we give 10% of the revenue to healthcare workers, doctors, and nurses who are on the front lines every day.

Ready to learn more? [Contact us](#) today.



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