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COVID-19 "Ask HR" Compliance Questions & Answers

The following is a collection of actual questions recently asked of Decision Associates Consultant, Elizabeth Cipolla by various New York State and Pennsylvania employers.

**All answers are provided by HR Executive Consultant, Elizabeth Cipolla, SPHR, SHRMSCP. The answers and information provided by Elizabeth Cipolla is not intended to be legal advice and is not a substitute for obtaining legal advice by a qualified attorney.*

Q 1. We have one employee who currently works 15 hours/week. We were going to restructure that position at the end of the year and eliminate it altogether. Now as we face these times the board wants to eliminate the position now especially since we have fewer funds coming in. Wouldn't this actually benefit this employee more to be laid off now?

A1. Yes, it could definitely benefit the employee more so now, since it is almost certain that unemployment benefits will be extended by the government. I've attached a document that will help you to understand/explain the calculation of weekly benefits for the impacted employee. **(See separate attachment titled, "Document A")**

Q2. I have two employees in similar positions, one will be returning from medical leave on Monday, 3/30 and the other has been with us two weeks and his wife is due to have a baby any day. I can't afford to let both of them go but should lay one off. I heard from somewhere, about the possibility of a furlough as an alternative to a layoff. I do not want to terminate either position. I'm thinking the young man whose wife is having a baby would rather be out with his wife while this is all going on and then have a job to come back to. Would he be able to receive 100% unemployment?

A2. I want to make sure you are properly classifying the temporary separation of the recently hired employee whose wife is having a baby. To assist you with this, I've attached a document that explains the difference between layoff, furlough, and reduction in force. **(See attachment titled, "Document B")** Many people use these terms interchangeably, but thy all mean something different. It will be important for you to classify it appropriately for the purpose of his ability to apply for unemployment benefits. Also, the document I attached as part of my response to the first question (as summarized above) will help you to answer the question about how much unemployment this employee would be eligible to receive. Since he has only been employed with you for 2 weeks, much of his eligibility will be based upon his earnings in the quarters prior to his employment with you. There is no person who earns "100%" of what they earned on unemployment. The maximum percentage one can earn is up to 60% of their earnings. But, again, since he has only worked with you for 2 weeks, it will be based off of what he earned elsewhere in the quarters leading up to the present day.

Q3. I'm wondering about the continuation of benefits during unemployment or other leave status. Our organization pays 80% of single health coverage for 3 full-time employees. Normally the 20% they contribute is a pre-tax payroll deduction. All full-time employees also have group term life insurance and long-term disability coverage, 100% employer paid. What are our obligations or options for continuing these benefits?

A3. As an employer who will be ending an employee's employment (either temporarily or permanently) due to financial strain, you do not have any obligation to continue the employer contribution towards their benefits once they become unemployed. I am not sure of how many employees you have total, but if you have 20 or more employees on your payroll, then you would have to give your separated employee(s) a COBRA notification letter within 14 days of their last day of employment. The letter would inform them of important information needed in order for them to opt for health insurance continuation. I've attached a document that summarizes everything you'd need to know about COBRA. However, the key thing for you to understand, is that they can opt to stay covered under your benefits during their time of unemployment, but they would need to cover 100% of the monthly premium in order to do so. You would send them invoices, and they would pay you directly every month for the full cost of their monthly benefit premium.

Another option for them, is to take advantage of the low-cost benefit offerings available through New York State of Health during the time they are unemployed and no longer covered under your plan. You can click on the link below to get a better understanding of both options, and the contact information you can provide the separated employees so they can make an informed decision about benefits continuation during their period of unemployment. Bottom line, upon their separation, you are legally responsible to make them fully aware of their last date of employer-paid benefits coverage under your plan, and the options available to them to continue benefits coverage.
The attached document **(See attachment titled, "Document C")** and the link below should provide you with the details needed in order for you to do this effectively.
https://www.dfs.ny.gov/consumer/csb_health_unemp.htm

Q4. I'm hoping you can let me know if our plan is ok. We have asked our hourly staff to work from home. They will receive their normal pay, but we realize they probably will not be working all of their normal hours. This first pay period we just asked them to complete a timesheet showing their normal hours not actual hours worked. For future pay periods, should they submit the actual hours worked?

A4. Yes, it is very important for you to have them track the actual hours worked. This is necessary in order for you to be compliant with the Fair Labor Standards Act (FLSA) which is the federal legislation that establishes employer's responsibilities as it relates to overtime pay, minimum wage, record keeping of hours worked, etc.
You can click on the link below for more specific guidance from the government about how to handle compensating your employees during this time.
https://www.dol.gov/agencies/whd/fact-sheets/70-flsa-furloughs

Q5. Do we have to lay our staff off in order for them to be able to claim unemployment?

A5. In order for your employees to be eligible to apply for unemployment, you have to officially "end" their employment (either temporarily or permanently) in one of the following three ways: layoff, furlough, or RIF (reduction in force). I have attached a document **(See attachment titled, "Document B")** that explains the difference between all three. It is important for you to properly classify it in accordance to whichever option aligns with your intentions. Many people throw the word "layoff" around when it is really a furlough. Just be sure to read the attached document to appropriately classify it, and then notify your employees officially of their last date of employment and what type of separation it is so they can file for unemployment benefits.

Q 6. Can I have employees continue to work (less hours than normal) and claim unemployment for days not worked?

A6. Absolutely! This is called the New York State "Shared Work Program", and it is an excellent alternative to reducing hours to zero during times of financial difficulty. It works like this...the weekly amount of unemployment benefits your employee receives is connected to the percentage their hours and wages have actually been reduced. So, for example, if their hours and wages have been reduced by 30% in a given week, they may receive 30% of their weekly unemployment benefit rate. It is also important to clarify that the weekly unemployment benefit rate is not a dollar-for dollar match as to what the employee was accustomed to earning. Unemployment benefits are typically approximately 60% of what an employee has earned in the quarters leading up to when their hours were cut. So, using my example of a 30% reduction of hours and wages, that would mean your employee would be eligible to collect 30% of their weekly unemployment benefit rate since that is 30% less than the 60% they would have typically received.

Q7. We are an exempt organization; therefore, we do not pay into unemployment insurance. When we first began hiring staff to run programming, we only had a few staff that were part-time. We didn't see the need to pay into unemployment. Obviously, we never expected a pandemic that would require us to cease operations. Would we be responsible for paying all of the unemployment claims? Or is there some assistance that is available to aid with this due to the coronavirus?

A7. This one is a little tougher for me to answer. I'm not clear on what you mean by saying you are "exempt" from paying into unemployment insurance. Based upon everything I know to be true about what is required of New York State nonprofits in terms of paying into unemployment insurance, all New York State nonprofits must provide unemployment insurance as soon as:

a. more than $1000 of renumeration is paid in a single day, or

b. whenever more than four workers are employed on one day in each of 20 weeks in a calendar year.

I would definitely look into it and make sure you're correct in saying that you are exempt from having to pay into unemployment insurance. I'm saying this, because if you haven't been paying into the unemployment insurance, then your employees will be denied insurance benefits. Worst case scenario, if you were previously inaccurately informed that you didn't need to pay into unemployment insurance benefits, you could face rather significant fines from the Department of Labor. They would be tipped off to the fact you haven't been paying into it when your employees submit a claim to file.
I'd suggest trying to contact someone from the NYS Department of Labor Unemployment Division to get the appropriate guidance for your specific case. Here is their contact information:

NYS DOL Unemployment Insurance Division
State Office Building Campus, Building 12
Albany, NY 12240-0339
Phone: (518) 457-4179
Fax: (518) 485-8010
Or: (888) 899-8810
Website: https://www.labor.ny.gov

Q8. I have one staff member who is not working so they can stay home with two young children due to school closure. One of this staff member's children is diabetic, which makes him more susceptible to the virus. Therefore, my employee does not want to have any contact with other staff members. Would my staff member be eligible for the Family Medical Leave Act rather than applying for unemployment?

A8. To clarify, the Family Medical Leave Act (FMLA) provides unpaid job protection to employees who must take time away from work for qualified reasons. This is a federally mandated act that applies only to businesses with more than 50 employees. Your employees are not eligible to receive FMLA leave because you have far fewer than 50 employees.
However, your employee would potentially be eligible to receive paid sick time from you in accordance with the **Families First Coronavirus Relief Act (FFCRA)**. Your employee would potentially be eligible for the following:

a. *Two weeks (up to 80 hours) of paid sick time at two-thirds the employee's regular rate of pay* because the employee is unable to work because of a bona fide need to care for an individual subject to quarantine (pursuant to Federal, State, or local government order or advice of a health care provider), or to care for a child (under 18 years of age) whose school or child care provider is closed or unavailable for reasons related to COVID-19, and/or the employee is experiencing a substantially similar condition as specified by the Secretary of Health and Human Services, in consultation with the Secretaries of the Treasury and Labor; and
b. *Up to an additional 10 weeks of paid sick leave at two-thirds the employee's regular rate of pay* where an employee, who has been employed for at least 30 calendar days, is unable to work due to a bona fide need for leave to care for a child whose school or child care provider is closed or unavailable for reasons related to COVID-19.
c. **However,** since you are a small business with less than 50 employees, **you'd most likely qualify for exemption from having to offer this benefit** since you could definitely argue that it'd jeopardize the viability of your organization.
d. Remember, if you do choose to offer this benefit and not apply for an exemption, you would be eligible to receive tax credits. Covered employers would qualify for dollar-for-dollar reimbursement through tax credits for all qualifying wages paid under the FFCRA. These tax credits also extend to anything you have to pay in order to keep your eligible employee(s) covered to maintain health insurance coverage. For more information on this, you'll want to visit the Department of Treasury's website.
e. Check out the FAQ link below from the DOL which was just updated to include further clarification regarding FFCRA and Unemployment benefits.

https://www.dol.gov/agencies/whd/pandemic/ffcra-questions

f. As another option of paid leave benefits, you should also know about New York Paid Family Leave (NYPFL) which provides paid leave to eligible employees for qualifying reasons. Without knowing your organization's financial situation, I can't say for certain if you are legally required to provide New York Paid Family Leave benefits. I am guessing your organization does not meet the minimal annual income requirements. Check out this link to learn more: https://paidfamilyleave.ny.gov/new-york-paid-family-leave-covid-19-faqs

g. Having said all of this, it may be sensible for you to have the employee file for unemployment since I'm guessing you are small enough NOT to be mandated to offer the benefits listed above.

Q9. I have a staff member who does not want to work because she cares for her 85-year-old mother and does not want her to contract the highly contagious COVID-19. Would this employee be eligible for the Family Medical Leave Act rather than applying for unemployment?

A9. See the same answer to question 7 above. That response applies to this question as well.

Q10. We are partnering with an outside organization to provide services for essential workers on an as-needed basis. Once the need arises, we plan to open up our facility to provide these services for the essential workers who need them. I have some staff that do not want to work if we open up to provide these services. They are apprehensive about being exposed to other people and the risk of contracting COVID-19. contracting the virus. If they choose not to work, can they still file for unemployment?

A10. The federal stimulus that Trump just signed recently (already passed by Congress) has a provision that says employees are eligible to receive unemployment for various situations that involve COVID 19. They are a bit loose on their specificity regarding what that includes. What remains to be seen, is how the state will interpret this verbiage. The federal law *may* say that employees can still collect $600 from federal unemployment even if their state denies it. States may start to give unemployment to virtually everyone who applies for it during this COVID crisis. In other words, I think it's likely that *anyone* who applies for unemployment (unless they've been terminated for cause) during this COVID-19 crisis will end up getting unemployment.

Q11. I am the HR Coordinator at a community nonprofit organization, but I'm still trying to wrap my head around the new leave policies. We have several staff members for our daycare who are considered substitutes. Some of them do work quite frequently, but they do not earn any benefit time or anything like that. Are they still eligible for the Emergency Family and Medical Leave Act? We have a staff member with children at home and wants to know if she will receive pay.

A11. Yes, ALL employees are entitled to this for any time out of work (for a qualified reason such as lack of childcare due to COVID-19) between 4/1 and 12/31/20.
Here is the guidance about how to calculate their pay for hours worked as per the DOL (see below):

"A part-time employee is entitled to leave for his or her average number of work hours in a two-week period. Therefore, you calculate hours of leave based on the number of hours the employee is normally scheduled to work. If the normal hours scheduled are unknown, or if the part-time employee's schedule varies, you may use a six-month average to calculate the average daily hours. Such a part-time employee may take paid sick leave for this number of hours per day for up to a two-week period and may take expanded family and medical leave for the same number of hours per day up to ten weeks after that.
If this calculation cannot be made because the employee has not been employed for at least six months, use the number of hours that you and your employee agreed that the employee would work upon hiring. And if there is no such agreement, you may calculate the appropriate number of hours of leave based on the average hours per day the employee was scheduled to work over the entire term of his or her employment."

Q12. Since a stay-at-home order is a qualifying reason for an employee to receive paid leave as part of the Families First Coronavirus Response Act, does an employer *have* to provide Emergency Paid Sick Leave

to an active employee without the option to work remotely? Or, can the employee go straight to unemployment if they choose not to work due to concerns of contracting COVID-19?

A12. What I'm not clear about in your question, is the nature of the stay-at-home order. I'm also not clear whether or not your business is deemed essential, and if so, whether or not this particular employee is able to perform their job remotely. Here are my thoughts…

Just because there is a general stay-at-home order, it doesn't prevent people from going into work if their business is allowed to be open as essential. In that case, it would have to be a specific quarantine or medical issue for the particular employee involved. Then, yes, they're eligible for the paid sick leave, but arguably could instead choose not to work and apply for unemployment.

If the business itself doesn't have any work available, i.e., they are closed because they're not an essential business, then an employee who can't work from home would not be eligible for paid sick leave and instead would have to apply for unemployment.

If the person could go into work but is just afraid of getting coronavirus, they might not be entitled to anything if they don't come in. And possibly could be fired, barring a disability accommodation issue. Though I would be very hesitant to rush to that outcome as per what I explained in the webinar on April 3, 2020.

Q13. If we have an employee that was laid off and scheduled to return to work on 3/31 but ended up in the ER on 3/30 and was tested for COVID-19, are they still considered laid off or do we have to pay them the 2 weeks sick time that went into effect on 4/1?

A13. If your employee went into the ER on 3/30 to be tested for COVID-19, they would need to be quarantined for 14 days as per the DOH's mandate. Day 1 of this would be 3/31 which is the date they were scheduled to return to work after being laid off the two weeks prior. Therefore, they would qualify for the Emergency Paid Sick Leave as part of the Families First Coronavirus Response Act during the time they are quarantined. Hopefully, your employee does not end up with a positive COVID-19 test result.

Q14. What suggestions do you have for employers to maintain contact with employees who've been laid-off. It just doesn't feel right to lay them off and have no communication.

A14. Here are my thoughts and some practical advice for you to consider:

- It's important for your laid-off staff to feel that they still matter to the company and haven't just been abandoned or forgotten about.
- Even though you can't ask a laid-off employee to handle work-related situations, you definitely can and should keep the lines of communication open if they have questions and provide periodic updates on your business's evolving situation amidst COVID-19.
- I also recommend scheduling time into your calendar to check in regularly with your laid-off employees and who empathy, care and emotional support to keep your valued employees motivated during these tough times. Afterall, you want to retain your valued employees once your organization is in a position to bring them back to work.
- Lastly, I think it is so important to make your communication personal to each impacted employee rather than sending a generic message to everyone. It will go a long way. If the number of your employees who've been laid off is too many for one person to follow-up with individually, you can enlist the help of other managers who you can trust to convey a genuine message of care, concern and goodwill.

Q15. How does the CARES Act affect the Emergency Family Medical Leave Act (EFMLA) and the Emergency Paid Sick Leave Act (EPSLA)?

A15. Employees eligible for both FMLA and EFMLA are entitled to only a combined total of 12 workweeks of leave during a 12-month period — keeping in mind that EFMLA eligibility expires on December 31, 2020.

Under the FMLA, eligible employees are entitled to up to 12 workweeks of leave during a 12-month period. This leave is unpaid. Under the recently passed EFMLA, employees who have worked for an employer with less than 500 employees for the 30 days prior to the start of an EFMLA leave, are eligible for up to 12 workweeks of leave if the employee is unable to work or telework because they must care for a son or daughter due to the school being closed due to a public health emergency or the child care provider being unavailable due to a public health emergency.

As we discussed in the webinar on April 3, 2020, the first two workweeks of leave under EFMLA are unpaid. However, those two weeks could be paid under EPSLA, if applicable. If EPSLA is not applicable, then the employee may choose to use other paid leave under your organization's existing policies. The remaining 10 workweeks of EFMLA are paid at two-thirds of the employee's regular rate of pay multiplied by the number of hours the employee normally would have been scheduled to work during the leave period. The pay, however, cannot exceed $200 per day and $10,000 for the total ten weeks ($12,000 when including EPSLA). The most recent DOL guidance made clear, however, that the new EFMLA did not entitle eligible employees to an additional 12 workweeks of leave on top of that already provided by FMLA.

Here is an actual example to demonstrate this point as provided by the Department of Labor:

> *"Assume you take four weeks of Expanded Family and Medical Leave in April 2020 to care for your child whose school is closed due to a COVID-19 related reason. These four weeks count against your entitlement to 12 weeks of FMLA leave in a 12-month period. If you are eligible for preexisting FMLA leave and need to take such leave in August 2020 because you need surgery, you would be entitled to take up to eight weeks of FMLA leave.*
> *Taking this example one-step further, if prior to April 1, 2020 (the effective date of EFMLA) an employee had exhausted all FMLA leave and would not again be eligible for leave until January 1, 2021, the employee would not be entitled to any EFMLA leave."*

Q16. I wanted to know if you heard anything about the $25,000 "hazard" pay for essential workers. Do you have any information yet?

A16. (As of April 11, 2020), this still hasn't made it past the Senate. Here are the details of what's being proposed as part of phase four of the coronavirus relief bill, which is known as the "COVID-19 Heroes Fund":

- Essential workers may be able to get a $25,000 raise soon if a new plan from Senate Democrats passes. The plan would lead to the creation of a fund to "reward, retain, and recruit essential workers."
- The fund would provide $25,000 for "pandemic premium pay increase for essential frontline workers" until the end of 2020. Workers would get an additional $13 per hour on top of their regular wages, capped at $25,000. The full raise would be available to people making less than $200,000 per year; those making more would be capped at $5,000.
- The fund would also provide a one-time $15,000 hiring bonus to "attract and secure" a workforce to fight the coronavirus. It would apply to people who enlist as healthcare or home-care workers or first responders where "severe staffing shortages" are "impeding the ability to provide care during the COVID-19 pandemic."

Q17. (PA only) I thought the new rules pertaining to the additional safety measures that must be taken by Pennsylvania organizations as announced by Governor Wolf went into effect Sunday 4/19 @ 8pm? If

that is the case, then why did you mention that it went into effect immediately during the webinar on April 17th?

A17. Great question. Here is some clarity about the timing of the additional safety measures announced by Governor Wolf which impact Pennsylvania organizations. Specifically, the order itself was/is effective immediately. However, it will begin being legally enforced as of April 19th, 2020 at 8am.

Q18. (PA only) Do you know why health care providers aren't required to implement some of the public business requirements as per what Governor Wolf just recently announced? It seems very counter-intuitive. I plan to implement all of those recommendations in my healthcare practice.

A19. Your question is in reference to the additional safety measures announced for all PA businesses which include additional measures for businesses with in-person operations. I have closely reviewed the order which clearly states that healthcare providers are excepted from following it. I am not finding an obvious explanation and have some ideas, but don't want to speculate without factual evidence to back it up. However, it is worth providing the following clarification which impacts businesses providing medication and medical supplies (in addition to businesses providing food). Specifically, the order states that businesses must *"require all customers to wear masks while on premises, and deny entry to individuals not wearing masks, unless the business is providing medication, medical supplies, or food, in which case the business must provide alternative methods of pick-up or delivery of such goods; however, individuals who cannot wear a mask due to a medical condition (including children under the age of 2 years per CDC guidance) may enter the premises and are not required to provide documentation of such medical condition."*

Q20. (PA only) We are hoping to get some deeper insight on the face mask mandate. We have a concern with the mandatory face mask recommendation. We are a manufacturing facility with a max of 20 people working in a 20,000 square foot open factory bldg. that is climate controlled. Our main concern is mandating employees who have underlying conditions. With their refusal we risk putting them and us in a position to disclose personal information to others. This would mean we are not following employee discretion guidelines. Can you please provide additional info pertaining to this issue?

A20. Your question is in reference to the additional safety measures announced for all PA businesses which include additional measures for businesses with in-person operations. To be clear, these measures that were announced by Governor Wolf are not a recommendation as you referenced in your question. Rather, this is a mandate being issued to all PA businesses by the Governor and State Health Commissioner. Therefore, it is a requirement for all state-wide businesses to comply as per the mandate. Having said that, there may be some employees with pre-existing health conditions which would make it extremely difficult (or impossible) for them to wear a face mask. If an employee brings it to their employer's attention that this is the case, then you will need to direct them to the designated HR professional (or, if you don't have an HR professional, direct them to the designated person who is responsible for maintaining confidential employee files and administering FMLA, disability leave requests, etc.). That individual may speak privately with the employee to understand their concerns. Then, that individual can give them the proper documentation for any potential leave for which they might qualify due to the health condition. If you do not have a knowledgeable HR professional who can navigate this or who has enough knowledge of the new (and pre-existing) employment laws in order to make a legally compliant determination of how to proceed, it is very important for them to seek the guidance of a professional. This is not a situation to take lightly, because you must juggle the new legal mandate just announced by Governor Wolf, in addition to the rights of the employee under the Americans with Disabilities Act (ADA), HIPPA, and FMLA, etc. In terms of your concern about disclosing personal information about the employee to others, as long as your designated HR professional is the only one with whom they are sharing this information – and your designated HR professional maintains the upmost confidentiality by not disclosing legally protected information and maintaining the proper legally compliant files, then you have nothing to worry about.

Q21. Our employees are working remotely at home, but we have employees who are going on site to business' that are in need of our services. It is only 2-4 employees at the most. How do we address it if an employee is exposed while on site at another business they are servicing, or is thought to have contracted COVID 19 at the business's location while servicing them? How do we handle it if we find that an employee has unknowingly been exposing the business they are servicing while on site due to their own COVID-19 diagnosis that is found out after the exposure has already taken place?

A21. To start, keep in mind that when your employees are on-site with a client, that is considered to be their "workplace" because they are performing work for Networking Technologies. So, just about everything we've been covering in our weekly webinars would apply because it would be considered a workplace exposure (if you knew they became infected after working at a client's site for example).

You will need to work with your local health department in conjunction with the Pennsylvania Department of Labor. The first thing you'll need to do is contact the Erie PA Health Department to inform them so they can provide the proper guidance to you. In working with various county and state health commissioners, the guidance they emphasize is to go to them as an initial step if you have an employee who's been diagnosed with COVID-19; regardless of where they may/may not have been exposed. Each situation is unique, and they want to manage each unique response. In addition, they have the expertise and availability of resources to properly investigate these matters.

In an instance such as what you've laid out in your scenarios, you have multiple laws/mandates to keep in mind. Some of them are listed below:

- Families First Coronavirus Response Act: Employee Paid Leave Rights
    - Check out the slide deck and employer information sheet I sent out after the webinar on 4/3/2020 for more information
- The Americans with Disabilities Act (ADA)
    - Privacy rules restrict employers from sharing personal health information of an employee.
    - You can (and should) inform employees that possible exposure has occurred in the workplace without disclosing any identifying information about the individual who tested positive.
- Health Insurance Portability and Accountability Act of 1996 ("HIPAA")
    - The only allowable disclosure by employers is "to public health authorities to the extent relevant to the authority and purview of public health authorities."
    - This includes disclosing positive test results for COVID-19 to state and local health departments, Health & Human Services, or the CDC as appropriate.
- OSHA
    - Occupational Safety and Health Administration (OSHA) has provided clarification of previous directive to investigate and record all work-related cases of COVID-19.
    - The new guidance states that employers do not have to investigate and record cases of COVID-19 in the workforce unless there is objective evidence that the COVID-19 occurrence is work related and the employer had access to that evidence. So, if you have objective evidence that the diagnosis may be related to a workplace exposure (including an exposure at your customer's office location during work hours), then you would need to record and investigate it as an OSHA recordable occurrence.
    - I've included an OSHA Fact Sheet for New Employers that will also be helpful if you are new to navigating how to record incidents such as a COVID-19 diagnosis. You can also learn more by visiting www.dol.gov
- New PA State Mandate
    - BEFORE an exposure to a probable or confirmed case of COVID-19, all PA employers must develop protocols which include:
        - identifying employees in close contact with the person and notifying those employees of that close contact while maintaining confidentiality

        - implementing temperature screening for each employee before starting work and sending home any employee with a fever of 100.4 degrees or higher.
    - Check out the COVID-19 exposure checklist I sent out after the 4/10/20 webinar for a sample of some protocol to follow.