

# COVID-19 Contact Tracing Protocol

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## I. Objective:

- A. This guidance is intended to provide FCA Medical Department personnel with a process for the systematic identification and monitoring of all persons who might have been exposed to a person diagnosed with COVID-19.
- B. Prompt identification, quarantine, and monitoring of these COVID-19 contacts can effectively break the chain of disease transmission and prevent further spread of the virus in the community and the workplace.
- C. The intent of the assessment is to make a medical determination of the individual's COVID-19 exposure risk to ascertain if the individual can safely remain in the work environment or will need to remain away from the work environment for a period of time.
- D. This policy also provides FCA Medical Department personnel with additional measures they will need to implement should they determine that an individual is a possible risk for COVID-19.
- E. To assist the Plants in Close Contact Tracing

## II. Scope

- A. All FCA and subsidiary North America sites are required to meet all applicable requirements of this document.
- B. This procedure applies to employees, external personnel, and visitors at FCA sites and Subsidiaries/Joint Venture Operations site, but not limited to, manufacturing plants, Parts Distribution Warehouses, Research/Development, Proving Grounds, Business Centers, Training Centers and Offices ("FCA Sites").
- C. Deviations from this procedure must be approved in writing by Corporate Health and Safety.
- D. National and/or local government regulations and order related to COVID-19 and applicable to a specific FCA Site should be considered and may supplement or supersede provisions within this procedure. Any adjustments to this procedure based on government requirements must be reported to Corporate Health and Safety.

## Background:

While data are rapidly emerging, current evidence indicates the SARS CoV-2 virus, which is responsible for COVID-19 disease, is primarily transmitted between people through contact with respiratory droplets (particles >5-10  $\mu\text{m}$  in diameter). This mirrors what was determined to be the primary mode of transmission of SARS-CoV-1 in the 2002–2003 outbreak which was transmitted via respiratory droplets up to a distance of about 6 feet. Droplet transmission occurs when a person is in close contact (within 1 m) with someone who has respiratory symptoms (e.g., coughing or sneezing) and is therefore at risk of having

his/her mucous membranes (mouth and nose) or conjunctiva (eyes) exposed to potentially infective respiratory droplets.

Close contacts are defined by the CDC as individuals who have been within 6 feet of an infected person for at least 15 minutes of a laboratory-confirmed or probable COVID-19 patients.

The risk of transmission from an individual with SARS-CoV-2 infection varies by the type and duration of exposure, use of preventive measures, and likely individual factors (e.g., the amount of virus in respiratory secretions). Most secondary infections have been described among household contacts, in congregate or health care settings when personal protective equipment was not used (including hospitals<sup>9</sup> and long-term care facilities<sup>10</sup>), and in closed settings (e.g., cruise ships<sup>11</sup>).

The risk of transmission with more indirect contact (e.g., passing someone with infection on the street, handling items that were previously handled by someone with infection) is not well established and is likely low.

Our goal with this assessment is to educate individuals, provide a measure to help decrease workplace concern, evaluate individuals for COVID-19 exposure risk potential, and refer individuals identified at risk to the appropriate public health authority for evaluation and care.

### III. Definitions

A. **Close contact with a Confirmed COVID-19 Case** meets at least one of the following:

1. a person living in the same house as a confirmed COVID-19 Case; or
2. a person who had direct physical contact or face to face with a Confirmed Case that meets the following requirements:
  - a) In Canada and US:
    - (1) at a distance of less than 6 feet (2 meters); and
    - (2) lasting longer than 15 minutes; and
    - (3) occurred within the 48 hours prior to the onset of symptoms or within the 48 hours prior to an asymptomatic person testing positive; or
  - b) In Mexico:
    - (1) at a distance of less than 1.5 meters; and
    - (2) lasting longer than 15 minutes; and
    - (3) occurred within the 48 hours prior to the onset of symptoms or within the 48 hours prior to an asymptomatic person testing positive; or
3. a person who has been in a closed environment (i.e., classroom, meeting room, hospital waiting room) with a Confirmed Case that meets the following requirements:

- a) In Canada and US:
  - (1) at a distance of less than 6 feet (2 meters); and
  - (2) lasting longer than 15 minutes; and
  - (3) occurred within the 48 hours prior to the onset of symptoms or within the 48 hours prior to an asymptomatic person testing positive; or
- b) In Mexico:
  - (1) at a distance of less than 1.5 meters; and
  - (2) lasting longer than 15 minutes; and
  - (3) occurred within the 48 hours prior to the onset of symptoms or within the 48 hours prior to an asymptomatic person testing positive.

Note: Reference local Country regulations during determination of contact tracing.

- B. **Confirmed COVID-19 Case (C.C.)** is a person with laboratory-confirmed COVID-19 infection; symptoms include but are not limited to: fever, cough or shortness of breath.
- C. **External Personnel** are people that work at FCA sites, but are not employed by FCA. Examples of external personnel include contractors, suppliers, visitors, and service providers.
- D. **Non-close contact with a COVID-19 Case** is a person that works in the general area of the C.C.; however, does not meet any of the items listed in the close contact definition.
- E. **Suspect COVID-19 Case** is a person with symptoms of fevers, cough, or shortness of breath; and is either waiting for laboratory-confirmation of COVID-19 infection or has not been tested to date, as determined by Medical or Medical Responsible.

## IV. Guidance

It is essential that all close contact tracing steps and information collected be comprehensively documented. Since much of this documentation may be considered sensitive and include personal medical information, FCA HR and medical staff will ensure that the contact tracing steps described below are completed and that all workplace close contacts have been notified and asked to self-quarantine.

### A. For workers who test positive for COVID

1. Employee notifies supervisor/HR/ of their positive result
2. Medical will be notified
3. Worker will be sent home
4. Supervisor will inform HR/LR that the employee has been sent home
5. Badge will be deactivated

6. HR/LR and supervisor will identify potential coworker close contacts using the HR protocol
7. The employee is placed on the Tracker as a Personal Illness
8. Medical will follow up telephonically with the person to verify positive result, receives the COVID positive test document, and updates OHM and the Tracker with the positive test result information
9. Medical notifies HR and EHS that the positive test results are confirmed
10. Medical will notify EHS of initial confirmed case so that deep cleaning/disinfecting of worker's area can take place
11. Medical receives the Potential Coworker Contact list from HR
12. Medical will contact the potential coworker close contacts and determine if they meet the criteria using the Interview Tool ([FCA-NA-COVID-102.1](#))
13. Close contacts will be sent home to quarantine for 14 days unless cleared by FCA Medical

**B. If employee has not been tested but is exhibiting COVID-19 symptoms:**

1. Worker notifies supervisor of their symptoms
2. The worker will be sent home if they are well enough to drive themselves.
3. Supervisor will inform HR/LR that the employee has been sent home
4. Badge will be deactivated
5. Medical will be notified
6. HR/LR and supervisor will identify potential coworker close contacts using the HR protocol
7. HR/LR will place them on the tracker as a Personal Illness
8. Medical will follow up telephonically with the person
9. Medical will refer them to the local FCA COVID testing center where applicable
10. Medical will refer the person to their healthcare provider
11. Medical will follow up telephonically with the person to discuss the positive result, and updates OHM and the Tracker with the positive test result information
12. Medical notifies HR and EHS that the positive test results are confirmed
13. Medical will notify EHS of initial confirmed case to determine the appropriate level of cleaning/disinfection
14. Medical receives the Potential Coworker Contact list from HR
15. Medical will contact the potential coworker close contacts and determine if they meet the criteria using the Interview Tool ([FCA-NA-COVID-102.1](#))
16. Close contacts will be sent home to quarantine for 14 days unless cleared by FCA Medical

**C. If an employee calls in with a positive COVID test result:**

1. Employee will be notified to stay home
2. Badge will be deactivated
3. HR/LR and supervisor will identify potential coworker close contacts using the HR protocol
4. HR/LR will place them on the tracker as a Personal Illness

5. Medical will follow up telephonically with the person to verify positive result, receives the COVID positive test document, and updates the Tracker and OHM with the positive test result information
6. Medical notifies HR and EHS that the positive test results are confirmed and Medical updates the Tracker with the positive test result
7. Medical will notify EHS of the initial confirmed case so that deep cleaning of worker's area can take place
8. Medical receives the Potential Coworker Contact list from HR
9. Medical will contact the potential coworker close contacts and determine if they meet the criteria using the Interview Tool ([FCA-NA-COVID-102.1](#))
10. Close contacts will be sent home to quarantine for 14 days unless cleared by FCA Medical

**D. If an employee fails, the daily Employee Questionnaire screening protocol because of symptoms or awaiting test results:**

1. Worker will not be allowed entry into the plant
2. Badge will be deactivated
3. HR/LR and supervisor will identify potential coworker close contacts using the HR protocol
4. Medical will follow up telephonically with the person
5. HR/LR will place them on the tracker
6. Medical will refer them to the local FCA COVID testing Center if they have not already been tested
7. Medical will refer the person to their healthcare provider
8. Medical will follow up telephonically with the person to verify a positive or negative result, receives the COVID positive test document, and updates OHM and the Tracker with the positive test result information
9. A documented positive test will result in Medical starting occupational contact tracing if the person had been in the facility previously
10. Medical will notify EHS of Initial confirmed case so that deep cleaning of area can take place
11. Medical receives the Potential Coworker Contact list from HR
12. Medical will contact the potential coworker close contacts and determine if they meet the criteria using the Interview Tool ([FCA-NA-COVID-102.1](#))
13. Close contacts will be sent home to quarantine for 14 days unless cleared by FCA Medical

## V. Responsibilities

- A. FCA HR and medical staff will ensure that the contact tracing steps described above are completed and that all workplace close contacts have been notified and asked to self-quarantine.

## VI. Appendix

- A. References

1. [CDC Coronavirus Disease 2019 \(COVID-19\) Contact Tracing](#)

B. Version History

Version No.	Description	Effective Date
1.0	Initial release	07/09/2020
1.1	Updated scenarios to include “HR/LR and supervisor will identify potential coworker close contacts” in each scenario within section IV.	07/13/2020
1.2	Updated close contact definition (III.A) to include 48 hours for close contact tracing.	11/10/2020
1.3	Updated close contact definition (III.A) to include “occurred within the 48-hours prior” for clarity.	11/13/2020

C. [FCA-NA-COVID-102.1 Close Contact ID Flow Charts](#)