
To: FCA International Contractors
From: FCA International Legal Counsel
Subject: **CDC Broadens Guidance on Degree of “Close Contact”**
Date: November 4, 2020

Overview

Since the onset of the COVID-19 pandemic, the Centers for Disease Control (CDC) has informed the public that “close contact” with infected persons poses a high risk of contracting the virus.

Previously, the CDC defined a “close contact” as spending at least 15 consecutive minutes within six feet of an infected person. However, the CDC [issued updated guidelines](#) defining “**close contact**” as being ***within six feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period***. This definition applies without regard to whether facemasks were used either by the newly infected person or the person(s) with whom close contact was had.

Basis for Change

The CDC was prompted to change the definition of what constitutes a close contact after a corrections officer at a Vermont prison became infected after several brief interactions with six coronavirus-positive inmates. The officer had 22 different, brief encounters with infected inmates that lasted only a total of 17 minutes overall – none coming close to the 15 minutes cited in the prior guidelines.

Employers and contact tracers must adjust correspondingly as more resources will be required to accurately identify multiple brief interactions over a 24-hour period by a newly infected individual. Moreover, the number of people who may be required to quarantine under this updated guidance is almost certain to increase.

Accordingly, employers must anticipate and prepare for possible staffing shortages that might result. To ensure compliance with CDC’s new guidelines, employers should also continue to update their policies, procedures, and record-keeping practices.

Bottom Line

Although it sometimes feels that this pandemic has been around forever, it is still relatively new and we are learning more about it all the time. Employers need to remain vigilant about maintaining their protective measures while also keeping a watchful eye out for any changes in recommended protocols.