



# Emerging from the COVID Shutdown: Legal Issues Affecting Your Business in Recovery and Beyond

**Welcome!**  
**We will start momentarily.**



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# **Louisiana Workers' Compensation Law and COVID-19 as a Potential Compensable Occupational Disease**



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# **Louisiana's Workers' Compensation Occupational Disease Statutes: A History**



To understand the potential to employers for possible compensability of COVID-19 infections of its employees under Louisiana Worker's Compensation law, it is important to understand the history of relevant Louisiana law.

In 1952, the Louisiana legislature established express statutory authority for the coverage of occupational diseases under Louisiana's workers' compensation law. The legislature rejected the notion of blanket coverage for all occupational diseases, and instead chose a moderate approach. The early legislation provided compensation for contraction of occupational diseases, which were placed into two categories:

One category included specifically listed diseases, namely conditions caused by exposure to X rays or radioactive substances, asbestosis, silicosis, dermatosis, and pneumoconiosis. The other category identified diseases by causative agents.



In 1975, it was recognized that many employment-related diseases did not fall into the two enumerated categories. Accordingly, the occupational disease statute was amended, setting forth a new definition of “occupational disease.” The list of specific diseases for which there was coverage under workers' compensation was removed, and substituted for the following: “[a]n occupational disease shall mean only that disease or illness which is due to causes and conditions characteristic of and peculiar to the particular trade, occupation, process, or employment in which the employee is exposed to such disease.” Through this amendment, the legislature was signaling its acceptance of a broader and more expansive definition of “occupational diseases” for which workers could seek compensation. Originally, La. R.S. 23:1031.1 provided as follows:





- A. Every employee who is disabled because of the contraction of an occupational disease as herein defined, or the dependent of an employee whose death is caused by an occupational disease, as herein defined, shall be entitled to the compensation provided in this Chapter the same as if said employee received personal injury by accident arising out of and in the course of his employment.
- B. An occupational disease shall mean only that disease or illness which is due to causes and conditions characteristic of and peculiar to the particular trade, occupation, process, or employment in which the employee is exposed to such disease.





In 1989, the legislature again amended the definition of “occupational disease” to exclude certain conditions, including degenerative disc disease, spinal stenosis, arthritis of any type, mental illness, and heart-related or perivascular disease. In 1990, the legislature specifically clarified that carpal tunnel is considered an occupational disease.



Through these amendments, the current and applicable Louisiana Workers' Compensation "Occupational Disease" statute is as follows:

- A. *Every employee who is **disabled** because of the contraction of an occupational disease as herein defined, or the dependent of an employee whose **death** is caused by an occupational disease, as herein defined, shall be entitled to the compensation provided in this Chapter the same as if said employee received personal injury by accident arising out of and in the course of his employment.*
  
- B. *An occupational disease means **only that disease or illness which is due to causes and conditions characteristic of and peculiar to the particular trade, occupation, process, or employment in which the employee is exposed to such disease.** Occupational disease shall include injuries due to work-related carpal tunnel syndrome. Degenerative disc disease, spinal stenosis, arthritis of any type, mental illness, and heart-related or perivascular disease are specifically excluded from the classification of an occupational disease for the purpose of this Section.*



- C. *Notwithstanding the limitations of Subsection B hereof, every laboratory technician who is disabled because of the contraction of any disease, diseased condition, or poisoning which disease, diseased condition, or poisoning is a result, whether directly or indirectly, of the nature of the work performed, or the dependent of a laboratory technician whose death is the result of a disease, diseased condition, or poisoning, whether directly or indirectly, of the nature of the work performed shall be entitled to compensation provided in this Chapter the same as if said laboratory technician received personal injury by accident arising out of and in the course of his employment.*

*As used herein, the phrase “laboratory technician” shall mean any person who, because of his skills in the technical details of his work, is employed in a place devoted to experimental study in any branch of the natural or applied sciences; to the application of scientific principles of examination, testing, or analysis by instruments, apparatus, chemical or biological reactions or other scientific processes for the purposes of the natural or applied sciences; to the preparation, usually on a small scale, of drugs, chemicals, explosives, or other products or substances for experimental or analytical purposes; or in any other similar place of employment.*

*Except as otherwise provided in this Subsection, any disability or death claim arising under the provisions of this Subsection shall be handled in the same manner and considered the same as disability or death claims arising due to occupational diseases.*



- D. Any occupational disease contracted by an employee while performing work for a particular employer in which he has been engaged for less than twelve months shall be presumed not to have been contracted in the course of and arising out of such employment, provided, however, that any such occupational disease so contracted within the twelve months' limitations as set out herein shall become compensable when the occupational disease shall have been proved to have been contracted during the course of the prior twelve months' employment by a preponderance of evidence.
- E. All claims for disability arising from an occupational disease are barred unless the employee files a claim as provided in this Chapter within one year of the date of that:
- 1) The disease manifested itself.
  - 2) The employee is disabled from working as a result of the disease.
  - 3) The employee knows or has reasonable grounds to believe that the disease is occupationally related.



- F. All claims for death arising from an occupational disease are barred unless the dependent or dependents as set out herein file a claim as provided in this Chapter within one year of the date of death of such employee (or) within one year of the date the claimant has reasonable grounds to believe that the death resulted from an occupational disease.
- G. Compensation shall not be payable hereunder to an employee or his dependents on account of disability or death arising from disease suffered by an employee who, at the time of entering into the employment from which the disease is claimed to have resulted, shall have willfully and falsely represented himself as not having previously suffered from such disease.



- H. *The rights and remedies herein granted to an employee or his dependent on account of an occupational disease for which he is entitled to compensation under this Chapter shall be exclusive of all other rights and remedies of such employee, his personal representatives, dependents or relatives.*
- I. ***Notice** of the time limitation in which claims may be filed for occupational disease or death resulting from occupational disease shall be posted by the employer at some convenient and conspicuous point about the place of business. If the employer fails to post this notice, the time in which a claim may be filed shall be extended for an additional six months.*

La. R.S. 23:1031.1. (Emphasis added).



After recognizing that an “occupational disease” includes repetitive injuries that result in a gradual deterioration or progressive degeneration, such as carpal tunnel syndrome, the legislature also revised the definition of “accident.” Accordingly, “accident” is defined as follows:

- 1) *“Accident” means an unexpected or unforeseen actual, identifiable, precipitous event happening suddenly or violently, with or without human fault, and directly producing at the time objective findings of an injury which is more than simply a gradual deterioration or progressive degeneration.*

La. R.S. 23:1021(1) (2014). (Emphasis added).





Thus, when an employee becomes disabled due to an occupational disease, he or she may be entitled to workers' compensation benefits as if said employee received personal injury by accident arising out of and in the course of his employment. However, the employee must show, by a preponderance of the evidence, that the **disease or illness is due to causes and conditions characteristic of and peculiar to the particular trade, occupation, process, or employment in which the employee is exposed to such disease.**

If an employee has been engaged in the particular work for an employer for less than 12 months, the disease is presumed to have not been contracted in the course of scope of employment. However, an employee can overcome this presumption by a preponderance of the evidence.



Moreover, this statute provides a specific time period for the employee or their respective dependent to file a claim for an occupational disease, being one year when three elements are all met:

- 1) that the disease manifested itself;
- 2) that the employee is disabled from working as a result of the disease; and
- 3) the employee knows or has reasonable grounds to believe that the disease is occupationally related.

All three elements must be met for the one year period to begin to run.



Moreover, this statute provides for death benefits to the dependents of the employee who file a claim within one year of the date of the death of the employee or within one year of the date that the claimant has reasonable grounds to believe that the death resulted from an occupational disease. The statute also expressly provides a general defense to such claims where the employee willfully and falsely misrepresented that they did not previously suffer from the specific occupational disease when they were hired.

Moreover, the employer is required to “post at a convenient and conspicuous point about the business,” notification of the time limitation for filing any claim for an occupational disease. If the notice is not properly posted, the time limitation for filing a claim of one (1) year is extended for an additional six (6) months.



In interpreting this statute, the Louisiana Supreme Court has reasoned that the occupational disease section of the workers' compensation act is essentially concerned with the claimant's proof that there is a relationship between the employment and the disease, such that the employer should bear the cost of the resulting disease or disability. Thus, the Louisiana Supreme Court has found that **causation is the central determinant** in assessing which risks are properly institutionalized as risks of employment and which risks properly remain in the tort system. *Arrant v. Graphic Packaging Inter., Inc.*, 2013-2878 (La. 5/5/15), 169 So.3d 296, citing *O'Regan v. Preferred Enterprises, Inc.*, 98-1602 (La. 3/17/00), 758 So.2d 124.



# **Proving Causation: Disease or Illness Due to Causes and Conditions Characteristic of and Peculiar to Employment**



As stated above, an “occupational disease” for purposes of Louisiana Workers’ Compensation law shall mean only that disease or illness which is due to causes and conditions characteristic of and peculiar to the particular trade, occupation, process or employment in which the employee is exposed to such disease.

The causal link between an employee’s occupational disease and work-related duties must be established by a reasonable probability. The claimant will fail if there is only a possibility that the employment caused the disease, or if other causes not related to the employment are just as likely to have caused the disease. *Atkins v. DG Foods*, 48,490 (La. App. 2 Cir. 9/25/13), 125 So.3d 530.

A broader interpretation would simply require that the claimant identify his disease as resulting from conditions and causes present in his employment and not by other causes to which the employee, and the general population, might have been exposed. See *Page v. Prestressed Concrete Co.*, 399 So. 2d 657 (La. Ct. App. 1st Cir. 1981). See also *Creekmore v. Elco Maintenance*, 659 So. 2d 815 (La. Ct. App. 1st Cir. 1995) (claimant did not recover because he could not prove that contraction of histoplasmosis came from removal of pigeon nests during employment rather than from the general prevalence of the disease in his geographical region).



Our country and state are certainly in very unfamiliar times with the global spread of COVID-19 infections. No Louisiana court has had to address such a mass calamity under Louisiana Workers' Compensation system for causation purposes. However, we do have some guidance from prior court decisions for analogous airborne disease claims.

In *Creekmore v. Elco Maintenance*, 94-1571 (La. App. 1 Cir. 6/30/95), 659 So.2d 815, the claimant alleged that he contracted histoplasmosis, an airborne illness, while removing pigeon nests from a building, as part of his employment. The court rejected his claim for compensation for this occupational illness, reasoning that the “very endemic nature of histoplasmosis” in the area, with the causative spores transmitted by the wind, made it a very common disease in the area. The Court of Appeal accepted the lower court’s interpretation, also noting that histoplasmosis spore are ubiquitous in the Mississippi valley and the histoplasmosis disease is very endemic. Further, the court noted that it was an airborne disease. The court stated that the evidence on bird dropping may possibly permit an inference that the claimant contracted histoplasmosis while clearing the nests; however, that evidence did not invalidate the clearly permissible contrary inference that claimant’s histoplasmosis was more probably contracted from elsewhere in the area. Accordingly, the court held that claimant did not show his occupational disease was due to causes and conditions characteristics of and peculiar to his employment, for the evidence was that histoplasmosis was a widespread, airborne disease in the area.





The cases cited above could be used to support a reasonable position and basis that COVID-19 in general is not “characteristic of and peculiar to” any type of employment. As in *Creekmore*, COVID-19 has been documented to be airborne and extremely contagious. As a new pandemic virus, researchers cannot state with certainty every conceivable manner how COVID-19 can be contracted. It has been documented that it lingers in the air for long periods of time. It is also documented to live on surfaces for long periods. It is rampant in the United States, and currently Louisiana is becoming a “hotspot” for the virus.

Further, as in *Hymes*, and due to the pandemic nature of COVID-19, it is generally not more likely that a person would contract it due to a work condition than a non-work condition. With few specific occupational exceptions (emergency healthcare providers, lab technicians, etc.), there is nothing overwhelming clear about COVID-19 that would generally make it peculiar to a type of employment when it could theoretically be contracted at any workplace.



# **A Somber Reality: When Coronavirus Results In Death of an Employee**



If COVID-19 is found to be a compensable occupational disease by one or more relevant Louisiana courts, and an employee dies as a result of the virus, an employer may be obligated to pay death benefits.

Proof of dependency is essential to recovery of death benefits, as only those considered dependents are able to recover. However, certain persons are entitled to a conclusive presumption of total dependency. The surviving spouse living with the deceased at the time of the accident or death is presumed to be actually and wholly dependent, as is a child under 18 (or over 18, if physically or mentally incapacitated from earning) who lives with the parent at the time of the injury, and a child up to the age of 23 if that child is enrolled and attending as a full-time student in any accredited educational institution. All other claimants, however, must prove dependency as a matter of fact. They must establish a need for the financial contributions of the deceased and also that such contributions were made by him during the year preceding the fatal accident.

Though the amount of death benefits is based upon a percentage of the pre-disease wages of the employee subject to the maximum payout, which is currently \$688.00 per week, the indemnity death benefits owed are determined based upon the number of dependents and the level of dependency.



# Conclusion



Although the burden of proof in establishing causation for COVID-19 as a covered employment occupational disease will be difficult for claimants to meet, COVID-19 may provide the ideal unique disease to allow employees to meet this significant burden. COVID-19 has certainly placed a strain on certain occupations, and the extraordinary exposure possibilities and stress employees are currently experiencing may not be considered “typical” of normal workplace stress. With this in consideration, the question becomes what should employers currently do?



# Questions?



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# COVID Impacts on Legislation and Liability



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# Legislative Update

- 2020 Louisiana Legislature
  - 40% new legislators
  - Term limits in action – Only a few legislators have more than three terms of experience
  - Sworn in Monday January 13, 2020
  - Clay Schexnayder – third term representative from Gonzales was elected Speaker of the House
  - Page Cortez – a third term senator from Lafayette was elected President of the Senate



## Legislative Update (cont.)

- Committee Chairs comprised of Republicans and Democrats
- Legislature asserted its independence by selecting its own leadership and rejecting outside influences in that process
- This Legislature is slightly older than preceding Legislatures, but less experienced in Legislative process, protocols and customs.



## Legislative Update (cont.)

- Legislative Independence, enthusiasm and interest in getting to work was quickly halted within a week of commencing the session on March 9, 2020.
- A Health Emergency was declared on March 11th and the legislature recessed on March 16th for an uncertain time.
- Other than for two brief partial days, the Legislature did not reconvene until May 4th
- Just under 1400 House and Senate Bills were left to address prior to adjournment on June 1st



## Legislative Update (cont.)

- A number of bills made it only part way through the process, including the critical means of finance for the State that have to be passed by the Legislature so the new fiscal year can start July 1<sup>st</sup>... so...
- The Legislature called themselves back into Session at 6:01 p.m. on June 1, 2020 after adjourning the Regular Session at 6:00 p.m.



## Legislative Update (cont.)

- Out of these 1400 bills, 370 were signed into law and 9 bills were vetoed.
- While a number of bills were addressed in the Regular Session, the focal interest of many legislators was to pass “Tort Reform” legislation and this dominated the agendas and strategies utilized to pass legislation.



## Legislative Update (cont.)

- SB418 by Senator Kirk Talbot – the Omnibus Premium Reduction Act passed during the last half hour of the Regular Session
  - 2 year prescriptive period
  - Reduced jury trial threshold to \$10,000 for torts
  - Repealed the prohibition of seatbelt use
  - Made changes to the Direct Action laws
  - Allowed payment of 150% of health insurance premiums



## Legislative Update (cont.)

- This legislation was vetoed by the Governor and returned to the Legislature. To date, there has been no attempt to override the veto
- This is likely due to the last minutes changes in the legislation that appeared to increase the amount of damages and expand direct action
- The law was proposed to reduce private passenger automobile insurance rates, but the final bill did not make this mandatory.





## Legislative Update (cont.)

- Positive Legislation that was enacted:
- Liability Protections for
  - Act 303 Manufacturers of PPE
  - Act 508 Restaurants
  - Act 336 General protection from civil liability for injury or death provided there was substantial compliance with federal state or agency guidelines
- Act 231 Attorney Advertising was limited.



# Legislative Update

- Act311 CARES Act Funding Legislation
  - Of the funds received by the State, approximately \$900 million was used to reimburse the State for COVID related expenditures and reduce the fiscal deficit. The balance of \$800 million was used to create two funds:
    - The Coronavirus Local Recovery Allocation Program - \$500 Million
    - The Main Street Recovery Program - \$300 Million



## Legislative Update (cont.)

- Main Street Recovery Program
- To be eligible:
  - for-profit corporation, a limited liability company, a partnership, or a sole proprietorship
  - domiciled in Louisiana as of March 1, 2020.
  - Is in good standing with the Secretary of State, if applicable.
  - Suffered an interruption of business.
  - Controlled by one or more Louisiana residents



## Legislative Update (cont.)

- Filed Louisiana taxes for tax year 2018 or 2019, or, for a new business intends to file Louisiana taxes for tax year 2020.
- Has customers or employees coming to its physical premises.
- No more than 50 FTEs as of March 1, 2020.
- Not a subsidiary of a business with more than 50 FTEs or part of a larger business enterprise with more than 50 FTEs



# Legislative Update (cont.)

- Excluded Businesses:
- No lobbying or political businesses
- Does not derive income from passive investments without active participation in business operations.



# Special Session To Date

- The Special Session has been largely a continuance of the Regular Session with more of a focus on tax legislation, correction on tort reform now known as civil justice reform, and refinement of the fiscal legislation
- No bills have been submitted to the Governor yet, but several have passed or are likely to pass both Chambers in the next few days
- These include the following tax credit /fiscal relief bills:
  - HB 37 (waiver of penalties and interest for late filed state taxes)



## Special Session (cont.)

- HB 45 (New Market Tax Credit revision to address investments in Qualified Active Low-Income community business)
- HB 64 (Fantasy Sports taxation; dedication to Early Childhood Education funding)
- HB 69 (Tax exemption for fiber optic cable)
- SB 4 (Extension of sunset to 2025 of R&D Tax Credit)
- SB 6 (Suspension of Franchise Tax for Small Business Corporations)



## Special Session (cont.)

- SB 17 (extends the sunset on the Angel Investor Tax Credit until 2023)
- SB 24 (provides eligibility of Angel Investor Tax Credits in federal Opportunity Zones)

### General Observations:

- The use of suspensive resolutions have been tried in ways never envisioned by the Constitution
- The President and Speaker are working together and effectively better than of their predecessors in recent memory.





## Special Session (cont.)

- The Legislators have a wide variety of novel ideas, some of which are good.
- The new Legislators are becoming quickly engaged in the process
- Part of this is due to the term limits – essentially, there are 12 years/3 terms to accomplish anything
- The Governor/President and Speaker are communicating more effectively than previously.



# Special Session Forecast

- In the next five days
  - There will be a Civil Justice Reform bill that will likely be signed by the Governor
    - It may include a mandatory rate reduction
    - Whatever it does, the civil justice system will materially change.
  - The fiscal legislation will pass
  - We will have more capital in reserves in case projections do not materialize
  - And there will be another special session this Fall.



# Federal Liability Legislation

- Pandemic Risk Insurance Act (PRIA) – introduced May 26th
  - Federal Backstop for Business Interruption that would cover pandemic exposure
  - Similar to the Terrorist Risk Insurance Act (TRIA)
  - It has a long path towards passage, but it has bipartisan support and
  - If passed, it would be effective for health emergencies declared January 1, 2021 and later
  - Voluntary Participation by insurers, but mandatory coverage if they participate



# Business Interruption Insurance Litigation Status

- 101 lawsuits filed in federal courts with many more likely to be filed. This does not include state court filings.
- No legislation has passed to retroactively impose coverage to date in Louisiana or elsewhere.
- Policies are varied and the analysis is fact intensive to each entity and their policy.
- Recommended practice is to file a claim and have your insurer make a determination



## Business Interruption (cont.)

- APCIA – (Property and Casualty Trade Association) estimates that if the industry is compelled legislatively to pay all claims that the property and casualty industry would be insolvent within a year.
- As a result, the negotiated or litigated resolution seems to be the most likely path.



# Questions?



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# Minimizing Risk While Returning Employees To Work



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# Big Picture

- Designate someone to “own” the return-to-work process.
- Develop written policies and procedures.
- Develop employee return-to-work notification and training.
- Maintain for at least 3 years.
- Monitor CDC, WHO, OSHA, DOL daily.





# FFCRA

- Runs through December 31, 2020
- EPSLA (6 reasons)
- EFMLA (1 reason)
  - School closure for summer vacation is not covered. Child care unavailable due to COVID-19 is covered. Includes family and friends.
- EFMLA leave counts as FMLA leave.
- 5 of 6 EPSLA reasons do not.



# CDC Guidance

- **STEP ONE:** Should you consider re-opening?
  - Opening allowed by state and federal orders?
  - Are you ready to protect high risk employees?
- If YES to both, proceed to STEP TWO.
- If NO to either, do not re-open.



# CDC Guidance (cont.)

- **STEP TWO:** Are recommended H&S actions in place?
  - Personal hygiene practices
  - Environmental cleaning practices
  - Social distancing practices/barriers
  - Modify travel, telework, etc.... policies
  - Customers-employee contact protocols
  - Understand OSHA requirements & guidelines
  - Train all employees in H&S policies practices
  - Have necessary PPE and materials on hand
- If YES to all, proceed to STEP THREE.
- If NO to any, do not re-open.



## CDC Guidance (cont.)

- **STEP THREE:** Is ongoing monitoring in place?
  - Policies to check employees for symptoms, daily if feasible.
  - Encourage the sick to stay at home.
  - Plan in place if employees become ill.
  - Monitor developments and communicate with employees.
  - Monitor employee absences and be more flexible with leave policies.
- If YES to all, re-open.
- If NO to any, do not re-open.



# Selecting Employees to Return to Work

- Use form letter
  - Date, location, to whom
  - Title, exempt/non-exempt status
  - Rate of pay, salary
  - Give a weeks notice
  - Failure to report = resignation or rejection of job offer
  - At will



# Selecting Employees to Return to Work (cont.)

- Continue to allow employee to work from home if possible
- Temperature checks are OK
- Covid-19 viral tests are OK
- Covid-19 antibody test are NOT ok (it is not job related and consistent with business necessity)



# Develop a Return-to-Work Program

- Employee position
  - Duties
  - Exempt vs. non-exempt
  - Training
- Employee contract
- Residual Benefits
  - Paid leave
  - Vacation
  - Sick



# Develop a Return-to-Work Program (cont.)

- Modification of employee benefits
  - Paid leave
  - 401k match
  - Insurance match
  - Auto
- Addressing “advanced” paid leave balance





# Develop a Return-to-Work Program (cont.)

- Prepare new-hire paperwork for employees who were separated from employment.
  - I-9
  - L.W.C.
- Notify/train employees regarding any policy changes.



# Unemployment

- What if an employee refuses to return to work?
  - Protected by ADA/FMLA/FFCRA?
  - Why is employee refusing to return to work?
  - Imminent risk of death or serious bodily injury?



# **Do Employers Need to Reimburse Employees For Using Their Home Computers And Smartphones While Working From Home During This Crisis?**

Not in Louisiana, but employee may not make below minimum wage and be cautious of losing exempt status.



# Must Employers Pay Employees Working At Home For Responding To Emails And Text Messages After-Hours?

Yes!

- Employers must compensate employees for all but *de minimis* time spent working.



# ADA Considerations

- Can we refuse entry to customers, vendors and employees who refuse to answer questions or wear masks?
- Accommodate employees with disabilities.
- Maintain a log of employee attendance and location on job for tracing purposes.
- Consider continued telework, additional physical barriers, alternate shifts...
- Maintain confidentiality of medical information.



# Employer Must Investigate Whether COVID-19 Infections Are Work Related

- OSHA about face in new guidance
- ***Recordable*** if:
  - Confirmed Covid-19
  - Work-related
  - Death, days off work, restricted work, transfer, loss consciousness, treatment beyond first-aid



# Employer Must Investigate Whether COVID-19 Infections Are Work Related

- How to determine “work-relatedness”?
- Ask employee how she believes she contracted virus
- Ask about employee work & non-work activities
- Consider employees work environment: other employees positive?
- Consider employees home life: spouse infected?



- ***Reportable*** if:
  - Death, or
  - In-patient hospitalization, amputation, loss of eye
  - Death: report in 8 hours if occurs within 30 days of incident.
  - Hospitalization: report in 24 hours if happens within 24 hours of incident.





# OSHA Considerations

- Know the difference between “recordable” and “reportable.”
- Keep workers compensation claims in mind.
- Develop plan for responding to positive COVID-19 screen.
- Environmental and personal hygiene, training and materials, and documentation will be key.
- OSHA will play into tort/work comp. claims.



# Discrimination Considerations

- Conduct disparate impact analysis if you do not return all workers.
- Document reasons.
- Comply with OWBPA regarding waivers and providing required information (1+ waiver).
- Comply with WARN act.
- If you return an employee to a different position, or not at all, be prepared to justify the decision.
- Be aware of contract issues.



# Questions?



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