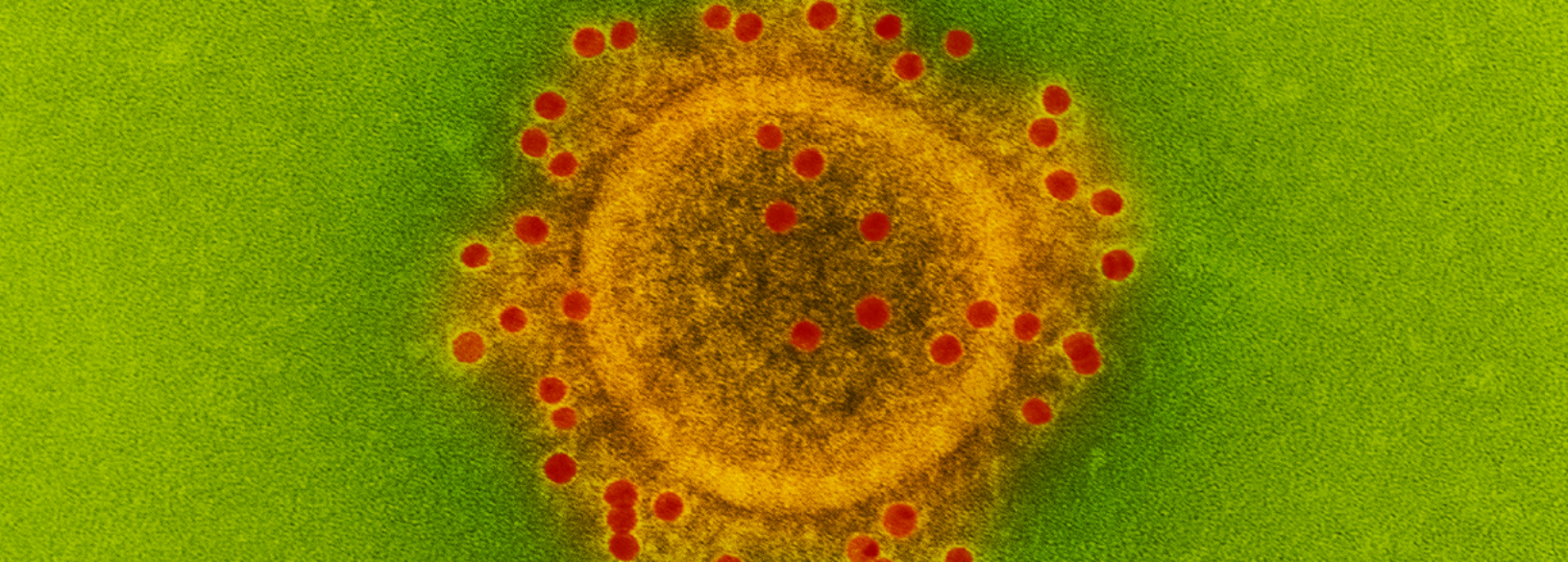


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# COVID-19 EMPLOYER FAQ

Curated from over 2,000 questions submitted to ThinkHR and Mammoth.



# Introduction

Since early this year, we have been on the ground, supporting employers as COVID-19 continues to cause understandable confusion, anxiety, and multiple challenges. Tens of thousands of employers have turned to us for answers about new legal obligations, workplace health, employee management, and business operations.

Because we understand the biggest challenges facing employers, we created this list of Frequently Asked Questions (FAQs) to help employers get trusted answers. As we continue to field new questions, we will promptly update this resource.

## The FFCRA and Other Applicable Leaves

### [What is the new federal COVID-19 law, and what does it do?](#)

Effective April 1, 2020, the **Families First Coronavirus Response Act (FFCRA)** is a federal law that will require employers to facilitate two major benefits. Under the new law, employees must be given:

1. Up to two weeks of emergency paid sick leave (EPSL) for illness, quarantine, or school closures related to COVID-19.
2. Up to 12 weeks of emergency Family and Medical Leave Act (EFMLA) leave for care of their children during school closures related to COVID-19, most of which must be paid. A few exceptions apply.

### [Do we need to provide the required sick leave under the FFCRA in addition to the sick leave we already offer, or can we lump it all together?](#)

There is nothing in the law preventing employers from creating one policy that includes the sick leave required under the Families First Coronavirus Response Act (FFCRA) as well as other sick leave an employer chooses or is required to provide. However, we urge caution in doing so for two reasons: 1) when combining policies that intend to meet multiple requirements, you need to make sure to include the most employee-friendly provisions from each; and 2) additional guidance given in the next few weeks could provide more details about how this leave should interact with existing leaves.



## What are our EPSL and EFMLA obligations to different employee situations, such as remote employees?

In general, emergency paid sick leave (EPSL) is available to all employees of private employers with fewer than 500 employees, public agencies, and other entities with more than one employee (no matter how long they have been employed or if they are remote). The emergency expansion of the FMLA (EFMLA) is available to employees of employers with fewer than 500 employees who have been employed for at least 30 calendar days. For both EPSL and EFMLA, employers may exempt health care providers and emergency responders.

## Is the FFCRA retroactive or applicable before its effective date?

No. The Families First Coronavirus Response Act (FFCRA) goes into effect on April 1, 2020 and is not applicable before that time.

## Does the FFCRA apply to me if I have more than 500 employees? How do I count them?

The Families First Coronavirus Response Act (FFCRA) does not apply to employers with 500 or more employees. The term “employee” is defined in the same way as in the Fair Labor Standards Act (FLSA) for emergency paid sick leave (EPSL) and the same way as in the Family and Medical Leave Act (FMLA) for emergency FMLA (EFMLA) leave. Generally, if they are currently on your payroll, then you would count them.

## How do EFMLA and EPSL relate to each other, especially in regard to caring for children?

The emergency FMLA (EFMLA) and emergency paid sick leave (EPSL) both cover caring for children whose school or place of care is closed due to COVID-19 precautions, though EFMLA has the broader restriction that the child be under 18 years old. The leaves can run concurrently with the first 10 days of EFMLA being unpaid, which will, in many cases, coincide with the 80 hours of pay (at  $\frac{2}{3}$  the regular rate) under EPSL for full-time employees.

## How does the FFCRA define emergency workers or healthcare providers?

The term “health care provider” has the same meaning as in the Family and Medical Leave Act:

1. A doctor of medicine or osteopathy who is authorized to practice medicine or surgery (as appropriate) by the State in which the doctor practices; or
2. Any other person determined by the Secretary to be capable of providing health care services.

“Emergency responder” is not specifically defined in the Families First Coronavirus Response Act (FFCRA). We expect there may be additional guidance on how this term should be interpreted in the coming weeks.

## How does the FFCRA apply to state law obligations, like unemployment or state-mandated paid sick leave?

Employers need to comply with both the Families First Coronavirus Response Act (FFCRA) as well as with their state sick leave obligations. The act does not specifically prohibit employers from combining the sick leave under emergency paid sick leave (EPSL) with their existing policies.

## Do we still have to provide EPSL or EFMLA if we shut down, or if we furlough or lay off employees?

Generally, under the Families First Coronavirus Response Act (FFCRA) any eligible employee is entitled to emergency paid sick leave (EPSL) and emergency Family and Medical Leave Act (EFMLA) leave effective April 1, 2020. We urge employers to consult the recent **guidance** on receiving immediate dollar-for-dollar reimbursement for EPSL and EFMLA as well as the plans for small business waivers for leave related to school closures when it would jeopardize the viability of the business.

## How are we supposed to pay for the sick leave and FMLA leave mandated by the Families First Coronavirus Response Act?

On Friday, March 20, the U.S. Treasury, IRS, and U.S. Department of Labor announced their plans for making the paid leave provisions in the Families First Coronavirus Response Act (FFCRA) less burdensome for small businesses. Key points include:

- To take immediate advantage of the paid leave credits, businesses can retain and access funds that they would otherwise pay to the IRS in payroll taxes. If those amounts are not sufficient to cover the cost of paid leave, employers can seek an expedited advance from the IRS by submitting a streamlined claim form that will be released next week.
- The Department of Labor will release “simple and clear” criteria for businesses with fewer than 50 employees to apply for exemptions from the leave provisions related to school and childcare closures; and
- There will be a 30-day non-enforcement period for businesses making a reasonable effort.

We know that for many of our clients, business slowdowns related to the spread of COVID-19 have made it hard to imagine how they could bear any additional expenses. We encourage anyone with these concerns to read the linked announcement carefully.

The full announcement can be found here: **Treasury, IRS, and Labor Announcement on FFCRA Implementation**. Including the information in the link, this is all we currently know about the payroll tax credit under the FFCRA and how to access or administer it.

## If I am a nonprofit or a public employer, do tax credits and reimbursement apply to me?

Most public employers (e.g., cities, municipalities, public school district) will not be eligible for the tax credits or reimbursements provided in the act. Private nonprofit entities, however, are eligible.

# Health & Safety

## Can we tell employees who travel to stay home and quarantine, even if they don't have symptoms?

Our recommendation is to follow guidance from the CDC — see Tables 1 and 2 in the CDC's [Interim US Guidance for a Risk Assessment](#) guide.

## We are an essential business where there's a shelter-in place-rule and an employee is refusing to work as they say it's not safe. Can we discipline them?

This is certainly a difficult situation to be in. We recommend extreme caution in disciplining or terminating an employee who refuses to work in a location that has shelter-in-place rules in effect, as it poses several types of legal risk. Generally, employees do not have a right to refuse to work based only on a generalized fear of becoming ill if their fear is not based on objective evidence of possible exposure. In that case, you would be able to enforce your usual attendance policies. However, under the current circumstances, where COVID-19 cases are increasing and many cities and states are implementing drastic public health measures to control spread of the virus, we think it would be difficult to show that employees have no reason to fear coming in to work, particularly in a location with a shelter-in-place rule.

### Are You an Essential Business?

Guidance has been released as to who and what qualifies as an essential worker or essential business. See [this document](#) to see if your business and workers may qualify. While this document is specific to California, if you are in another state that has not yet released guidance on who or what is essential, this may be a good reference and may be similar to what your state releases in the near future.

### Provide Reasonable Accommodation

Employees who are in a high risk category — either because they are immunocompromised or have an underlying condition that makes them more susceptible to the disease — should be granted a reasonable accommodation under the Americans with Disabilities Act (ADA) and/or state law. Employees who live with someone who is at high risk should be granted a similar accommodation. It would be a reasonable accommodation under the circumstances to allow the employee to work from home or take a non-working leave, if working from home is not possible.

Under OSHA rules, an employee's refusal to perform a task will be protected if all of the following conditions are met:

- Where possible, the employee asked the employer to eliminate the danger, and the employer failed to do so;
- The employee refused to work in "good faith." This means that the employee must genuinely believe that an imminent danger exists;
- A reasonable person would agree that there is a real danger of death or serious injury; and
- There is not enough time, due to the urgency of the hazard, to get it corrected through regular enforcement channels, such as requesting an OSHA inspection.

## No Punishment or Retaliation for Raising Safety Concerns

An employer cannot retaliate against an employee for raising a safety concern. Additionally, employees who won't work because of safety concerns may be considered to be engaging in protected concerted activity under the National Labor Relations Act (NLRA) if they have a "good faith" belief that their health and safety are at risk.

## Incentivize Employees Instead

Instead of disciplining employees who express fear at this time, we recommend you consider methods to encourage employees to come to work and to help put their minds at ease. Consider emphasizing all of the safety methods you have put in place (e.g., scheduled hand-washing, frequent disinfection of surfaces, social distancing rules, reduced customer capacity, staggered shifts, or more extreme measures if warranted by your industry). We recommend relying heavily on the Centers for Disease Control and Prevention (CDC) guidelines and local health department information in establishing safe working conditions at this time. You might also consider offering premium pay or additional paid time off (PTO) for use in the future to employees who must come to work.

## Is it safe for our employees to keep working? How do we decide whether to keep employees working or not?

Ultimately each company will need to determine how it will fulfill its duty to provide a safe workplace to its employees. It's very important to pay attention to federal, state, and local authorities to see if they are rolling out specific guidance or prohibitions that you need to be aware of. For example, some locations have issued an order for individuals to "shelter in place," which drastically limits what workplaces can remain open and provides some guidance for those who can remain working.

COVID-19 is a breaking issue, so guidance has been changing from day to day and region to region. We recommend keeping up with the latest information on the Centers for Disease Control (CDC) Coronavirus **home page**, related pages on that site, and your local health department for the most up to date guidance for your region and operations.

## Can we send employees home if they are symptomatic?

Yes. The Centers for Disease Control and Prevention (CDC) has **advised employers** that employees who appear to have symptoms of COVID-19 (e.g., cough, shortness of breath) should be separated from other employees and sent home immediately. If the employee feels well enough to work, consider whether they can effectively telecommute.

**Note:** Nonexempt employees may be entitled to a few extra hours of pay if you're in a state with reporting time pay, but this cost will be well worth it to maintain the safety of the workplace.

## Can I send an employee home if they are sick or pregnant, regardless of whether it's COVID-19-related, just to be safe?

You have the right to send people home for sickness if it appears that they have something contagious; in this case, you are protecting other employees in the workplace. This includes sending employees home who have the common cold.

You should not send employees home because you believe they are higher risk — this includes pregnant employees. We would encourage you to make working from home or unpaid leaves available for employees who want that option, but not to force that on anyone who doesn't pose a risk to others.

### What if my employee discloses that their family member or roommate has COVID-19?

Our recommendation is to follow guidance from the Centers for Disease Control and Prevention (CDC). Employers should ask employees who live with someone confirmed to have COVID-19 to notify a designated HR representative or their supervisor as soon as possible. The employer and employee should then refer to CDC guidance to assess risk and determine next steps — see Tables 1 and 2 in the CDC's **Interim US Guidance** for Risk Assessment and Public Health Management.

### What should we do if a potentially exposed employee came into the office? Do we inform affected employees and/or send everyone home?

You should refer to the CDC's Risk Assessment tool and/or contact your local health authority to help you determine what steps, if any, would be warranted to protect other employees. Remember that medical information (even of an employee's family member) must be kept confidential under the Americans with Disabilities Act.

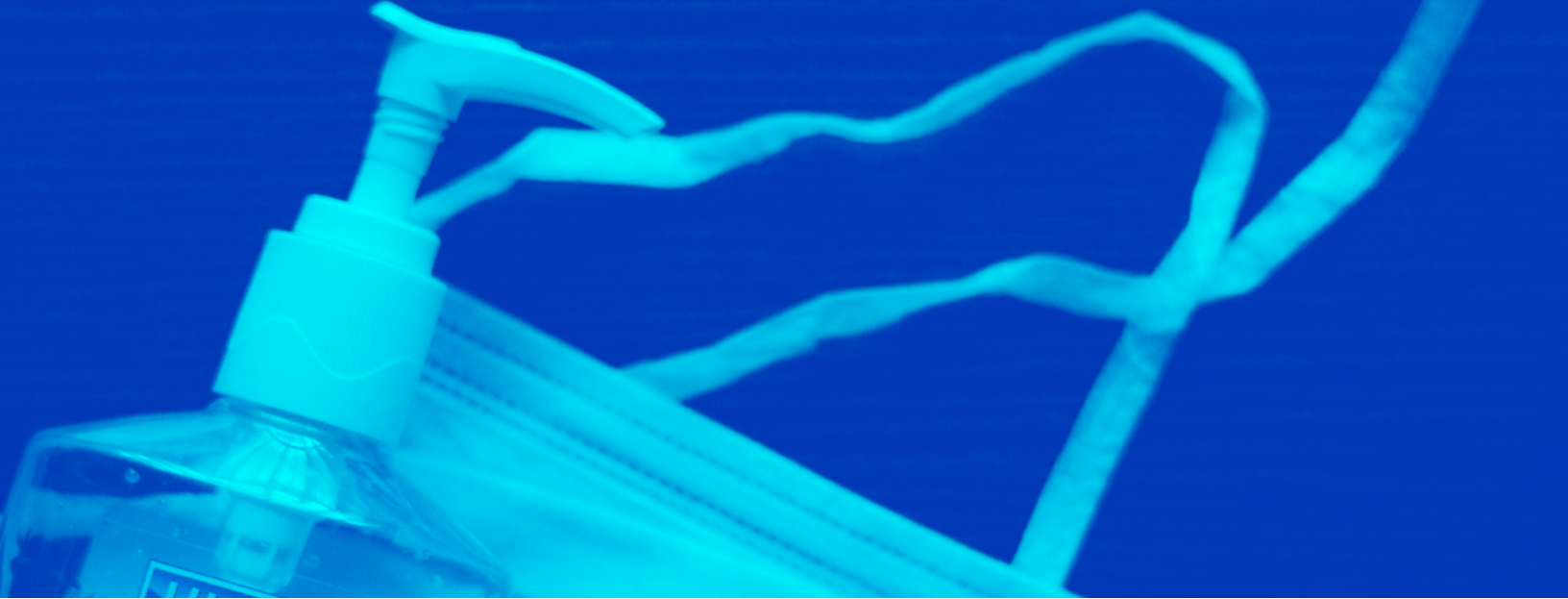
### Given COVID-19, if an employee is out of the office due to sickness, can we ask them about their symptoms?

Yes, but there's a right way to do it and a wrong way to do it. In most circumstances, employers shouldn't ask about an employee's symptoms, as that could be construed as a disability-related inquiry. Under the circumstances, however — and in line with an employer's responsibility to provide a safe workplace — we recommend asking specifically about the symptoms of COVID-19 and making it clear that this is the extent of the information you're looking for.

Here's a suggested communication: "Thank you for staying home while sick. In the interest of keeping all employees as safe as possible, we'd like to know if you are having any of the symptoms of COVID-19. Are you experiencing a fever, cough, and/or shortness of breath?"

Remember that medical information must be kept confidential as required by the Americans with Disabilities Act (ADA). If the employee does reveal that they have symptoms of COVID-19, or has a confirmed case, you should see the CDC's **Interim Guidance** to determine next steps. Tables 1 and 2 will help you assess risk and determine what steps, if any, should be taken.

***"You should not send employees home because you believe they are higher risk - this includes pregnant employees."***



### What should we do if an employee says their symptoms are not related to COVID-19?

This is a tough situation. The Equal Employment Opportunity Commission (EEOC) and the Centers for Disease Control and Prevention (CDC) advise employers to send employees home when they have COVID-19 symptoms (fever, cough, shortness of breath). Employees should not return until they are symptom free for at least 24 hours without symptom-altering medication (e.g., Tylenol, cough suppressants). The CDC is asking employers not to request a doctor's note because of the current strain on our healthcare system due to the pandemic.

If an employee claims that their symptoms are attributed to another cause (e.g., allergies, asthma), the most risk-adverse response would be to send employees home when they have COVID-19 symptoms, with pay. We understand that providing paid leave for all employees is not feasible for every business, but paid leave will incentivize employees to be honest and help you keep your workplace safe.

The CDC has a risk assessment tool available [here](#), which might be helpful. We would also note that, based on news reports, some people have tested positive for COVID-19 without any known exposure.

### How do we handle taking employee's temperatures?

The Equal Employment Opportunity Commission (EEOC) has issued guidance that employers may take employees' temperatures during the COVID-19 pandemic because COVID-19 is spreading nationwide. Note that many people may have COVID-19 without a fever, so other safety precautions should not be scaled back just because employees "checked out" upon arrival to work. The CDC summarizes symptoms [here](#).

The main [CDC COVID-19 page](#) has general community mitigation strategies as well as certain regional specific strategies. We cannot provide guidance on how to implement temperature checking procedures, but significant precautions should be taken so that you do not actually increase risk by reusing a tool that comes into contact with hands and/or mouths of multiple employees.

***"The CDC is asking employers not to request a doctor's note because of the current strain on our healthcare system due to the pandemic."***



## Do we have to pay an employee we sent home due to COVID-19?

Employees must be paid for any work they do at home. If you send someone home and they cannot work remotely, then whether you pay them, and how much, will depend on their classification.

### Nonexempt employees only need to be paid only for actual hours worked

For nonexempt employees, in situations where leave under the Families First Coronavirus Response Act (FFCRA) does **not** apply, the company may:

1. Pay the employee for the time, even though they did not work;
2. Require they take the day off unpaid;
3. Require they use any available vacation time or PTO; or
4. Allow employees to choose between taking an unpaid day or using vacation or PTO

All four options are compliant with state and federal law. We generally recommend the option 4 — allowing employees the option of using vacation time or PTO, but not requiring it.

### Exempt employees must be paid their regular salary unless they do no work for an entire week

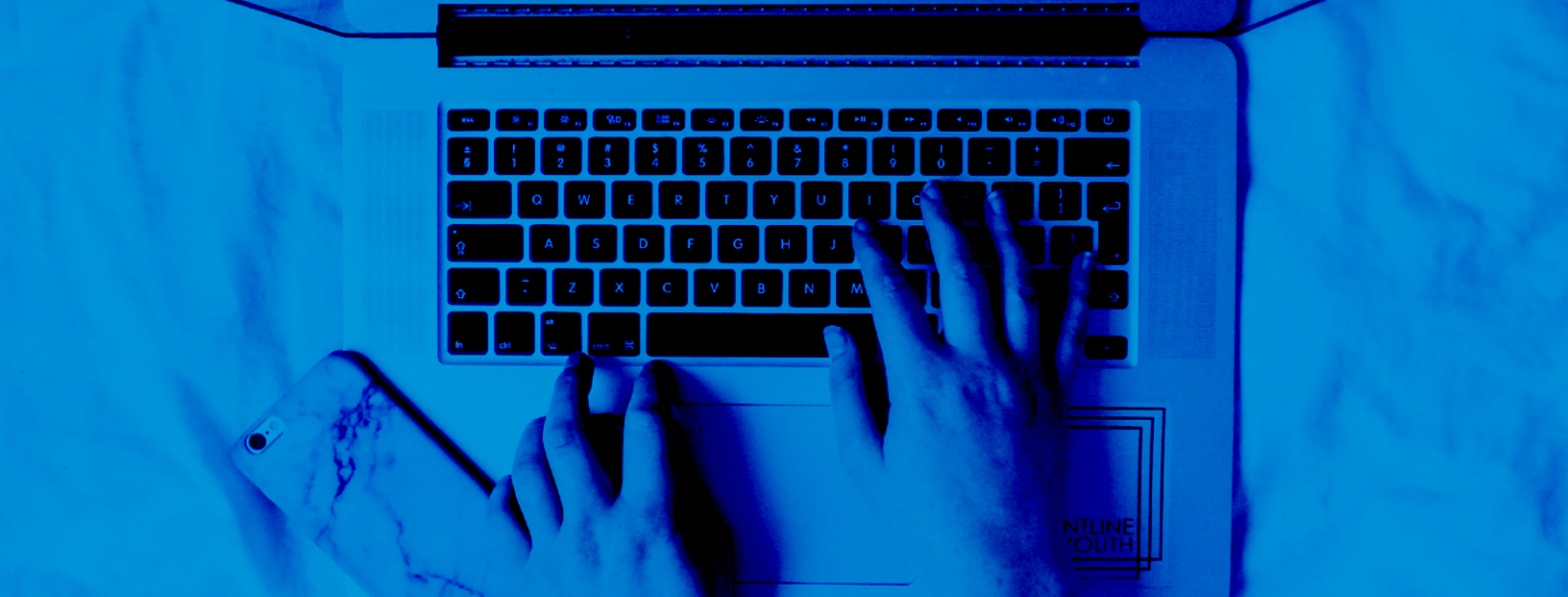
This holds true whether they are sent home for full or partial days. You may, however, require exempt employees to use accrued vacation or PTO if you have a policy that indicates you will do so, or if this has been your practice in the past. If your office has closed or sent people home for emergencies in the past and you have **not** required exempt employees to use vacation or PTO, and you want to require that this time around, you should indicate — ahead of the closure, if possible — that you are changing your policy or practice on this issue. When it comes to accrued vacation or PTO, it is safest to give employees advance notice if there are situations where you will use their accrued hours whether they like it or not.

For exempt employees who do not have sufficient vacation or PTO to cover the closure, you are still required to provide them with their full regular salary. The only scenario where you will not be required to pay an exempt employee their full salary is if the office is closed for an *entire workweek* (or the employee is unable to come in for an entire workweek) and *they do no work at all from home*.

***“You may, however, require exempt employees to use accrued vacation or PTO if you have a policy that indicates you will do so, or if this has been your practice in the past.”***

## Can we require employees to get medical notes for sick or medical leaves related to COVID-19?

You can, but the CDC asks that you not require them for an employee to return to work, as health care practitioners are already overwhelmed.



## Making Working From Home Work

### Can we require or allow certain groups of employees, but not others, to work from home?

Yes. Employers may offer different benefits or terms of employment to different groups of employees as long as the distinction is based on nondiscriminatory criteria. For instance, a telecommuting option or requirement can be based on the type of work performed, employee classification (exempt v. nonexempt), or location of the office or the employee. Employers should be able to support the business justification for allowing or requiring certain groups to telecommute.

### How do I make a telecommuting policy?

Although some employers will be comfortable sending everyone home with their laptop and saying “go forth and be productive,” most will want to be a little more specific. A good telecommuting policy will generally address productivity standards, hours of work, how and when employees should be in contact with their manager or subordinates, and office expenses.

For instance, your policy might require that employees are available by phone and messaging app during their regular in-office hours, that they meet all deadlines and maintain client contacts per usual, and that they check in with their manager at the close of each workday to report what they have accomplished. Be sure to let employees know whom to contact if they run into technical difficulties at home.

You'll also want to specify how expenses related to working from home will be dealt with. If you don't expect there to be any additional expenses involved, communicate this. You don't want employees thinking this is their chance to purchase a standing desk and fancy ergonomic chair on your dime. That said, you should consider whether employees will incur reasonable and necessary expenses while working from home. Some states mandate reimbursement for these kinds of expenses, but it's a good practice to cover such costs even if it's not required by law.

## How do we make sure we pay employees appropriately when they work from home?

You'll want to pay an employee that is working from home just like you would pay someone who is working in the office. Have them log their time and, if needed, report it to someone who can enter it into your payroll system (if this is something they can't do themselves online). Nonexempt employees should take all the same breaks at home that they are required to take in the workplace. With respect to ensuring that people are actually doing work at home, you may want to set up regular check-ins to see that things are getting done. You can also require that employees remain available online via a messaging app and are available by telephone or for video conferences during working hours.

## Furloughs & Layoffs

### What's the difference between a furlough and a layoff?

First, you should note that the language used when sending employees home for a period of time is less important than communicating your actual intent. Since temporary layoffs and furloughs are only used regularly in certain industries (usually seasonal), you should not assume that employees will know what they mean. Be sure to communicate your plans for the future, even if they feel quite uncertain or are only short-term.

#### Furlough

A furlough continues employment but reduces scheduled hours or requires a period of unpaid leave. The thought process is that having all employees incur a bit of hardship is better than some losing their jobs completely. For example, a company may reduce hours to 20 per week for a period of time as a cost-saving measure, or they may place everyone on a two-week unpaid leave. This is typically not considered termination; however, you may still need to provide certain notices to employees about the change in the relationship, and they would likely still be eligible for unemployment.

If the entire company won't be furloughed, but only certain employees, it is important to be able to show that staff selection is not being done for a discriminatory reason. You'll want to document the nondiscriminatory business reasons that support the decision to furlough certain employees and not others, such as those that perform essential services.

#### Layoff

A layoff involves terminating employment during a period when no work is available. This may be temporary or permanent. If you close down completely, but you intend to reopen in the relatively near future or have an expected reopening date — at which time you will rehire an employee, or all employees — this would be considered a temporary layoff. Temporary layoffs are appropriate for relatively short-term slowdowns or closures. A layoff is generally considered permanent if there are no plans to rehire the employee or employees because the slowdown or closure is expected to be lengthy or permanent.

***“Be sure to communicate your plans for the future, even if they feel quite uncertain or are only short-term.”***

### **Pay for exempt employees (those not entitled to overtime)**

Exempt employees do not have to be paid if they do no work at all for an entire workweek. However, if work is not available for a partial week for an exempt employee, they must be paid their full salary for that week, regardless of the fact that they have done less work. If the point is to save money (and it usually is), it's best to ensure that the layoff covers the company's established seven-day workweek for exempt employees. Make it very clear to exempt employees that they should do absolutely no work during any week you're shut down. If exempt employees do any work during that time, they will need to be paid their normal weekly salary.

### **Pay for nonexempt employees (those entitled to overtime)**

Nonexempt employees only need to be paid for actual hours worked, so single day or partial-week furloughs can be applied to them without worrying about pay implications.

We recommend that you engage in open communication with the affected employees before and during the furlough or temporary layoff period.

## **Our business is suffering due to COVID-19. We can't afford to pay people and might have to close. What do we do?**

This is understandably a very difficult situation for employers and their employees.

There are three basic options when it comes to keeping employees or letting them go: furlough (temporary reduction in hours of work or weeks of work); temporary layoffs (layoff with the intention of rehire, generally within six months); or permanent layoffs (layoff with no anticipated rehire date). In all situations, it's best to be very clear in written communications about your decision and work with an attorney.

Employees who are furloughed can still receive unemployment insurance benefits, so employers shouldn't feel like they have to terminate everyone just so they can receive unemployment insurance.

## **Can we reduce pay because of economic slowdown due to COVID-19?**

You can reduce an employee's rate of pay based on business or economic slowdown, provided that this is not done retroactively. For instance, if you give employees notice that their pay will change on the 10th, and your payroll period runs from the 1st through the 15th, make sure that their next check still reflects the higher rate of pay for the first 9 days of the payroll period.

### **Nonexempt employees (those entitled to overtime)**

A nonexempt employee's new rate of pay must still meet the applicable federal, state, or local minimum wage. Employees must be given notice of the change to their rate of pay, and some states require advance notice.

### **Exempt employees (those not entitled to overtime)**

An exempt employee's new salary must still be at or above the federal or state minimum for exempt employees. The federal minimum salary is \$684 per week. Several states have weekly minimums that are higher than that (California and New York, for instance, are in the \$1,000 per week range). The minimum may not be prorated based on hours worked.



## Exempt employee reclassification

If an exempt employee has so little work to do that it does not make sense to pay them the federal or state minimum (or you simply cannot afford to), they can be reclassified as nonexempt and be paid by the hour instead. This must not be done on a very short-term basis. Although there are no hard and fast rules about how long you can reclassify someone, we would recommend not changing their classification unless you expect the slowdown to last for more than three weeks. Changing them back and forth frequently could cause you to lose their exemption retroactively and potentially owe years of overtime.

## Employees with contracts or CBAs

If employees have employment contracts or are subject to collective-bargaining agreements (CBAs, you should consult with an attorney before making any changes to pay.

## If we choose to close temporarily, do we need to pay employees?

It depends on the employee's classification.

Nonexempt employees only need to be paid only for actual hours worked. For these employees, you may:

1. Pay the employee for the time, even though they did not work;
2. Require they take the time off unpaid;
3. Require they use any available vacation time or paid time off (PTO); or
4. Allow employees to choose between taking an unpaid day or using vacation or PTO.

All four options are compliant with state and federal law. We generally recommend option 4 – allowing but not requiring employees to use vacation time or PTO. If your office is required to close by health authorities and your state has a sick leave law, employees may be able to use accrued paid sick leave during the closure.

Exempt employees must be paid their regular salary unless the office is closed for an entire workweek and they do **no work at all from home**. You can, however, require them to use accrued vacation or PTO during a closure if you have a policy that indicates you will do so, or if this has been your past practice. When it comes to accrued vacation or PTO, it is safest to give employees advance notice if there are situations where you will use their accrued hours whether they like it or not.

## Do we still offer the same benefits during a furlough due to COVID-19 as we did before? What about a layoff or closure?

Check with your benefits provider before you take action. Eligibility for benefits during a furlough or layoff will depend on the specifics of your plan. For health insurance, if an employee would lose their eligibility during a furlough (or layoff), then federal COBRA or state mini-COBRA would apply.



### **If we close temporarily, will employees be able to file for unemployment insurance?**

Depending on the length of the closure, employees may be able to file for unemployment insurance. Waiting periods range from 1 – 3 weeks and are determined by state law. Be prepared to respond to requests for verification or information from the state unemployment insurance department if you close for longer than the mandatory waiting period.

### **I'm concerned about the cost of unemployment as well as how to advise employees about it. Any help?**

Remember that you don't pay unemployment insurance (UI) claims directly. They are paid by the state, and the state gets funds for that from unemployment insurance taxes that employers pay into regularly. Some employers are concerned that their UI tax rate will increase due to current layoffs, but it appears that many states will essentially be forgiving COVID-19-related terminations with respect to future increases in UI tax rates.

Most employees who experience reduced hours, furloughs, or layoffs will be eligible for at least some unemployment insurance. Exactly how much will depend on a number of factors. Employees should be encouraged to file as soon as possible and to research rules, benefits, and options themselves to ensure they get the best benefit possible. We recommend that both employers and employees visit their state's unemployment insurance department website and track local and state news, as departments across the country are updating their rules to facilitate displaced workers during this time.

## **Conclusion**

Many small businesses are overwhelmed due to COVID-19. In this time of unprecedented need, we're offering the best information from our customer-only resources to the public, including this FAQ. We appreciate you sharing it with any employer who could benefit.

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## About

The combined entity of ThinkHR and Mammoth is a trusted provider of HR knowledge and technology-powered employer solutions. Together, the two companies deliver HR on-demand to hundreds of thousands of small- and medium-sized businesses nationwide.



[www.thinkhr.com/COVID19](http://www.thinkhr.com/COVID19)