



**SUPPORTING EMPLOYEES
WITH LONG COVID:
A GUIDE FOR EMPLOYERS**

Introduction

Since the COVID-19 pandemic began in the spring of 2020, COVID-19 has impacted people in many ways. Government reports estimate that [millions](#) of Americans have experienced prolonged, lingering symptoms, a condition known as Long COVID. These symptoms can be severe enough to affect an individual's ability to function, including the ability to work. This publication provides information and resources to help employers support employees with Long COVID.

What is Long COVID?

According to the Centers for Disease Control and Prevention (CDC), [post-COVID conditions](#) (also known as Long COVID) are a wide range of new, returning or ongoing health problems people can experience four or more weeks after first being infected with the virus that causes COVID-19. Even people who were asymptomatic in the days or weeks after they were infected can have post-COVID conditions. These conditions can present as different types and combinations of health problems for different lengths of time. Commonly reported symptoms associated with Long COVID include fatigue, shortness of breath, muscle pain, cough, headache, joint pain, chest pain, an altered sense of smell, diarrhea and altered taste.

Does Long COVID affect employee mental health?

As more of the workforce returns to in-person work, many employees are experiencing [fear and anxiety](#). In addition, one [study](#) found that within six months of contracting COVID-19, one third of patients had been diagnosed with neurological or psychiatric conditions, including anxiety, depression, post-traumatic stress disorder (PTSD) and psychosis. For almost 13% of these patients, this was their first such diagnosis. Mental health and workplace well-being should be at the forefront of every employer's planning. Through collaboration, employers can create supportive, inclusive workplaces for all workers. The [Employer Assistance and Resource Network on Disability Inclusion's](#) (EARN) [Mental Health Toolkit](#) contains information and tools that can support employers as their employees return to work. In addition, the Campaign for Disability Employment (CDE) recently launched a new [initiative](#) that offers several resources for employers.

How does Long COVID affect the workplace?

Long COVID is contributing to a current, national labor shortage. In [a survey of Chief Executive Officers](#) (CEO), labor shortages ranked as the greatest external threat by U.S. CEOs and the third greatest challenge for CEOs globally. The [Job Openings and Labor Turnover Survey](#) (JOLTS) data published by the Bureau of Labor Statistics reported 11.4 million job openings for June 2022, and [research](#) suggests that people leaving their jobs due to Long COVID could account for up to 15% of these job openings.

Large companies like [JPMorgan Chase](#) and [Accenture](#) predict the current labor shortage will outlast the pandemic. Because the competition for labor may be intense, and hiring and training new employees can be [costly](#), employers may want to explore ways to support and retain current employees, including those with Long COVID.

How can employers support and retain employees with Long COVID?

Employers can support and retain employees with Long COVID by providing effective accommodations when needed. According to the Equal Employment Opportunity Commission (EEOC), [Long COVID may be a disability](#) under the Americans with Disabilities Act (ADA). As such, employers may have a legal obligation to provide accommodations. However, there are [benefits](#) to providing accommodations beyond fulfilling legal obligations, so employers may want to explore accommodations even when not required to do so.

When exploring [accommodations](#) for employees with Long COVID, start by asking the employee for ideas – employees are often the best resource for effective accommodation ideas. If the employee does not have ideas that work, the [Job Accommodation Network](#) (JAN) can help. JAN is a free consulting service for workplace accommodations and the ADA. As a starting point for ideas, see [Accommodating Employees with COVID-19 or Long COVID](#).

Another way you can support employees with Long COVID is by providing [workplace flexibility, such as telework and flexible scheduling](#), as a benefit of employment. Providing workplace flexibility can help all employees balance personal and workplace demands but can be especially beneficial to employees with Long COVID who may be experiencing a disability for the first time. When flexibility is built-in, employees with disabilities have less need to disclose personal medical information and request accommodations, making the workplace feel more inclusive.

If you do not already have a paid leave policy that covers time off needed by employees with symptoms of Long COVID, you might consider developing one. Paid leave can ease some of the [stress associated with having Long COVID](#) and can [benefit](#) you as an employer. For example, paid leave policies have been shown to improve employee retention and increase productivity. For more information, see [Access to Paid Leave for Family and Medical Reasons Among Workers with Disabilities](#).

Finally, another way to support employees with Long COVID is to refer them to available organizational resources, especially when an employee is experiencing a disability for the first time. If you have internal resources such as an Employee Assistance Program (EAP) or Employee Resource Group (ERG), an employer can remind employees that these options are available.

Questions and Answers

Q. An employee has asked for accommodations due to Long COVID. What should my next steps be?

A. Your next steps can vary depending on the situation and the specific accommodation request. Initially, an employer should engage in the [interactive process](#) with the employee. To help ensure consistency and success, you should consider developing written accommodation policies and procedures if you do not already have them. When developing policies and procedures, employers should strive to draft flexible and simple procedures, appoint a responsible person to implement them, and inform all employees about the policies by written notice or other office-wide communication. For more information about developing policies and procedures and providing effective accommodations, see JAN's [Employer Page](#) and [Workplace Accommodation Toolkit](#).

Q. What do I do if my employee cannot get an official Long COVID diagnosis?

A. Because Long COVID is a relatively new condition, some employees may find it challenging to obtain a definitive diagnosis. The Long COVID diagnosis is **complicated** because employees may have developed Long COVID symptoms after having been asymptomatic with COVID-19. However, a diagnosis may not be necessary to move forward with providing an accommodation.

The ADA defines a **disability** as “a physical or mental impairment that substantially limits a major life activity.” Even if an employee does not have an official diagnosis, the health care provider should be able to document that the employee has an impairment and how the impairment affects the employee. Keep in mind that the ADA does not provide a list of medical conditions that constitute disabilities. Instead, it includes a general definition of disability that each person must meet. Rather than determining whether an employee has a disability, your focus should be on the employee’s limitations and whether there are effective accommodations that would enable the employee to perform essential job functions. It should be noted, employers may choose to provide an accommodation even when not legally required to do so under the ADA.

Q. How do I support an employee who wants to perform 100% telework due to Long COVID?

A. If the employee meets the definition of disability and needs to perform 100% telework because of their disability, you can consider the request as you would any other accommodation request. An employer can further support an employee by granting the request on a temporary basis without going through the formal ADA process, with the understanding of reassessing the need to continue telework later. This approach might give the employee the support and flexibility needed to get treatment or adjust to having a new disability. For more information, see [Telework Accommodation Request Tool](#) and [Providing Temporary Accommodation Solutions](#).

Q. How do I assess what support an employee with Long COVID needs when they seem fine at work but then report that they feel sick and ask for time off?

A. There are a few options that you may want to explore. These include intermittent **leave** under the **Family and Medical Leave Act** (FMLA), intermittent use of accrued paid leave under company policy, or allowing an employee with a disability to use intermittent leave as an ADA-related accommodation. If the employee prefers to work instead of taking leave, you can work with the employee to determine whether there are accommodations you can provide other than leave time.

Q. How flexible do I have to be when providing workplace flexibilities for an employee with Long COVID?

A. If you are providing flexibility as an accommodation under the ADA, then you must provide it unless doing so poses an undue hardship. If you are providing flexibilities for all employees as a workplace policy, you can be as flexible as you choose to be and then provide any additional flexibilities on a case-by-case basis when accommodating employees with disabilities. For more information, see [Managing Flexible Work Arrangements](#).

- Q.** We have gone through an exhaustive interactive process with an employee who has Long COVID, trying several accommodations, including reassignment, without success. What are resources we can provide the employee if we have determined the employee is no longer qualified for the position?
- A.** Employers may determine that it is worth the investment to provide education or training for an employee who is no longer qualified for the position currently held or other vacant positions within the organization. This “upskilling” or “reskilling” gives the opportunity for a valued employee to acquire the skills necessary for another position. However, when separation is the only option, you may consider providing resources to the employee as part of your off-boarding process. Examples include the [Administration for Community Living’s Disability and Aging Networks](#), the [Social Security Administration](#) and [state vocational rehabilitation agencies](#) among other job-seeker resources.
- Q.** An employee of mine is a caregiver for someone with Long COVID. What am I obligated to do to support them and what types of supports can I offer?
- A.** In March 2022, the EEOC released new [guidance](#) about protections for caregivers, including those who care for people living with Long COVID. Though “caregiver” is not a protected status under federal employment discrimination laws, caregiver discrimination is illegal when it intersects with discrimination based on a caregiver’s protected status, including disability, sex (including pregnancy, sexual orientation and gender identity), race, color, religion, national origin, age or genetic information. In a 2021 report prepared for Congress regarding the Family Caregivers Act, the RAISE Family Caregiving Advisory Council suggests caregivers are disproportionately likely to be a member of a protected status group, particularly women, people over 40 and members of racial minorities. Discrimination is also illegal based on a caregiver’s association with someone with protected status, including Long COVID, if diagnosed as a disability. The EEOC’s guidance provides information and links to additional resources.

This publication is funded by the U.S. Department of Labor’s Office of Disability Employment Policy under cooperative agreements OD-33975-19-75-4-36 with Cornell University (total funding \$10,000,000) and OD-38028-22-75-4-54 with West Virginia University Research Corporation (total funding \$11,920,000). All funding for the cooperative agreements is from federal funds. The Employer Assistance and Resource Network on Disability Inclusion (EARN) is a resource for employers seeking to recruit, hire, retain and advance qualified employees with disabilities. The Job Accommodation Network (JAN) is the leading source of free, expert and confidential guidance on job accommodations and disability employment issues. The opinions expressed in this document do not necessarily reflect the views or policies of the U.S. Department of Labor, nor does mention of trade names, commercial products or organizations imply endorsement by the U.S. Government.