

Best Practices for COVID-19 Workplace Screening

The CDC and many jurisdictions are recommending temperature taking and health screening questions as a means to limit the spread of COVID-19 as workplaces reopen. Additionally, the Equal Employment Opportunity Commission ("EEOC") and other governmental bodies have generally sanctioned temperature screening of employees per the CDC's guidance or as defined by local public health authorities.

All roads point to implementing a COVID-19 workplace screening program. Now the tricky part, what are the best practices to do this. We don't claim to be experts, but we have done our research. The following are what we've uncovered and curated for you after reading a bevy of articles written on the topic.

Screening Strategy Best Practices

Have a process – Set forth a **consistent** process for conducting the checks. Avoid a “flavor of the day” approach defined by whoever is in charge on a given day. This process should consider potential differences between testing essential workers, remote workers returning to the workplace, previously quarantined workers coming back to work, and visitors.

Have readied responses – Think through how you will handle/what your response will be **if** someone refuses the test. A set procedure needs to be followed to deny his/her entry to the workplace. Likewise, be ready to respond to and handle an employee who either has a high temperature (over 100.4°F per the CDC's guidance) or answers “yes” to a screening question. Generally, they should be told to return to their homes, self-isolate and call a local public health authority to find out further steps to identify the cause of symptoms and right next steps in terms of medical attention.

Know next steps - It is important to follow-up with any employees sent home to see if any of them have tested positive for COVID-19. If someone tests positive you will need to notify the employees with whom they had contact. To avoid ADA concerns, the best practice is to notify them that they may have been exposed without identifying the individual. On the flip side, don't notify employees with whom they didn't have contact to maintain privacy. You will also need a protocol for employees who were sent home because of a heightened temperature or other symptoms. Ideally the individual must certify in writing that he/she is not having any symptoms since three days and has documentation from a medical professional confirming that they tested negative for COVID-19.

Give employees notice – Employers should notify employees and visitors that checks will be performed or required. At the same time, people should also be told that checks won't necessarily ensure a COVID-19 free workplace, as so many with the virus are asymptomatic. It is however an important preventative measure.

Empower employees – All employees should know that if they begin to feel unwell once at the workplace, that they should contact their manager or other designated personnel. They should know they won't be penalized. You are empowering them to do what is right in a pandemic.

Think through compensation – If you have non-exempt employees, think in advance as to whether they will be compensated for time spent waiting for testing. There is no set rule on this, but good employee relations and state law requirements may weigh in the favor of paying employees for this time.

Screening Protocol Best Practices

When to conduct – While screening can be done at different times in a day, the best practice is to conduct a check at the beginning of the employee's workday. This will reduce the possibility of a potentially sick employee coming into contact with others prior to having their temperature checked at random and/or set times in a workday. If dealing with a large number of people entering at the beginning of the day, consider if shifts or start times can be staggered to reduce volume. If not possible, consider using multiple entrances for screening.

How to conduct – You have two options on the table: human conducted or automated. There are a multitude of factors to consider relative to **your** business when making this decision including safety concerns, liability, flow rate, availability, expense, employee and customer satisfaction... [Read *Triaging Employees and Customers for COVID-19* for an in depth look at the options.] The best practice is deciding what best fits your business needs and culture.

What equipment to use – Contactless is the holy grail in terms of equipment choice. This includes no-contact digital thermometers and thermal cameras. There are pros and cons to each. What you want though is the solution that enables a high level of accuracy. From our research this points to an automated thermal camera-based solution, which while more expensive, allows temperature taking from a greater distance and eliminates human error. While temperature taking seems simple on the surface, it is filled with complexity. [Read *A Layperson's Guide to Understanding Temperature Taking Accuracy* to learn more about the technology.]

Where to conduct – The best location, though not always feasible, is to conduct screening outside the building or just inside the entrance. The why? If someone has symptoms, it prevents that individual from introducing germs into the building where others could be infected. It also avoids the potentiality of having to close the space or even facility for deep sanitizing, if that person tests positive for COVID-19. Next best is a designated specific, isolated area of the building that can be cleaned appropriately

and daily without forcing an emptying of the full facility. In either case, offering as much privacy as possible is desirable. As a part of the screening protocol, also think about whether you will have a secondary screening area where someone with an elevated temperature can sit and retest. There may be other reasons for temperature elevation including recent exercise.

Social distancing – Ensure social distancing if employees or visitors must wait in line for screening. Consider placing markings (tape or otherwise) on the ground to demarcate six-foot lengths. We all are getting use to this at stores and other.

What to record – An important consideration is whether you will conduct checks as “go/no go” or keep a log of temperature results. No best practice here. It is what you are comfortable with. While employers are permitted to take temperatures during the pandemic, if results are “recorded”, that information must be maintained confidentially per the American Disability Act (ADA). You can consider simply recording “no” (meaning the employee’s temperature is under the appropriate threshold) or “yes” (meaning the employee has a fever at 100.4 degrees or above) instead of recording temperatures. Regardless, the information should be treated as a confidential medical document and not placed in any employee’s personnel file.

Who to assign to human-based screening – If human-based screening is your best option, the best practice is to utilize someone who is a medically trained professional. Some organizations are lucky enough to have this person on-site and on-the-payroll already. If an organization doesn’t, there are third parties that are providing this as a service. In the latter case be sure appropriate confidentiality agreements are signed before testing is started. If you choose to go with non-medical personnel for the assignment, the suggested best practice is to designate one or more management-level personnel to conduct the testing, which avoids putting non-management personnel in an awkward position with peers. That individual should be trained. It should not be assumed that temperature taking is simple. The margin for error is high when using digital thermometers.

What to do for humans taking tests – If a human is screening vs. using an automated system, that person should be provided with gloves, goggles, face masks and gowns. If you are not using a contactless system, then gloves should be changed with each temperature taking. You may also want to consider other physical barriers or partitions to further protect the test-taker.

Conclusion

Temperature screening, done right, is one more safeguard against COVID-19. To do it right takes having a strategy and well thought through protocol. Couple this with maintaining social distancing best practices in the office, frequent hand washing and disinfecting, we all have a better chance of staying open for business and staying safe.