

GRAHAM COVID-19 - CONDUCTING SYMPTOM AND TEMPERATURE SCREENING ON PERSONNEL

Safety Services

Questions related to conducting symptom and temperature checks on personnel have come up in many discussions in the past few weeks as we all deal with COVID-19. We've listed some of the most frequently asked questions and answers to those questions below.

1. AM I REQUIRED TO CONDUCT SYMPTOM & TEMPERATURE CHECKS ON PERSONNEL?

Symptom and temperature checks have been required by some regulators for settings such as nursing homes and hospitals. Other industries may be required to conduct symptom and temperature checks when an employee is suspected to have COVID-19 or was confirmed to be COVID-19 positive and was in close contact with co-workers in the two days prior to the onset of the employee's symptoms. Check your specific state requirements for symptom and temperature screening.

Note: Close contact is defined by the Centers for Disease Control and Prevention (CDC) as being less than 6 feet from the person for a prolonged period of time (10 minutes or greater).

2. CAN I CONDUCT TEMPERATURE CHECKS ON PERSONNEL IF I AM NOT REQUIRED TO?

Yes, but see the note below regarding state requirements. Employers implementing symptom and temperature checks should establish a consistent process for conducting these checks and protecting employee health information.

On March 19, 2020, the Equal Employment Opportunity Commission (EEOC) issued updated guidance specific to COVID-19 and the Americans with Disabilities Act (ADA). The EEOC confirmed that measuring employees' body temperatures is permissible given the current circumstances with COVID-19 and its classification as a "direct threat" by the CDC. While the ADA places restrictions on the inquiries that an employer can make into an employee's medical status, and the EEOC considers taking an employee's temperature to be a "medical examination" under the ADA, the federal agency recognizes the need for this action because the CDC and state/local health authorities have acknowledged community spread of COVID-19.

As an added measure of infection control, employees should be encouraged to self-monitor their own temperature at home prior to coming to work and stay home if they have a fever of 100.4° F or greater.

Note: Employers should verify that state (e.g. California Consumer Privacy Act) requirements regarding the collection of body temperature are not more stringent than federal requirements.

3. HOW DO I CONDUCT SYMPTOM & TEMPERATURE CHECKS?

While fever is a common sign of COVID-19, not all those who have tested positive for COVID-19 had a fever. Therefore, symptom checks are a prudent measure to prevent the spread of COVID-19 to fellow employees and serve as a reminder to employees of the symptoms for self-monitoring.

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Since persons with symptoms of COVID-19 other than fever should be sent home, to best utilize the hierarchy of controls, we recommend that, before administering a temperature check, you conduct symptom screening. Unless expressly prohibited by regulation, consider the hierarchy of controls, when performing symptom and temperature screening.



- Elimination Physically remove the hazard Implement symptom and temperature checks by employee with attestation or via video call.
- Substitution Replace the hazard Implement symptom and temperature checks asking employees to use their own (i.e. BYOT - Bring your own thermometer to work).
- Engineering Controls Isolate people from the hazard Consider using an accurate no touch thermometer designed for obtaining adult temperatures.
- Administrative Controls Change the way people work Maintain social distancing for those waiting in queue for screening.
- **PPE** Protect worker Ensure personnel performing screening are wearing appropriate PPE.

When conducting a symptom screening, inquire if employee has experienced any of the below in the previous 3 days or since he or she has last worked:

- Fever or feeling feverish
- Fatigue
- Shortness of breath
- Change or loss of taste
- Diarrhea
- Chills
- Headache

- Cough
- Change or loss of appetite
- Muscle pain/aches
- Change or loss of smell
- General soreness
- Repeated shaking with chills
- Sore throat

If the employee has had any of the above symptoms in the previous 3 days of since he or she last worked, the employee must return home and be provided with CDC Guidance for follow up with their primary care physician or local health department.

Following the symptom survey, ask if the employee has been in close contact with anyone who is COVID-19 positive or suspected to have COVID-19. If the employee answers "yes," advise the employee to return home and to contact his/her healthcare provider. Report affirmative answers to the COVID-19 Coordinator.

After the symptom survey and close contact question, if the answers have all been "no," conduct the temperature screening.

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Additional considerations include:

- 1. Personnel assigned to perform symptom and temperature checks must maintain social distancing with exception to the brief time to use the thermometer.
- 2. Personnel must wear gloves, eye protection, isolation gown/body covering, and an isolation mask to perform the symptom screening and temperature checks. Gloves must be changed between screenings and the entire thermometer must be cleaned with alcohol swab between screenings if direct employee contact occurs. The isolation mask and isolation gown/body covering need only be changed if soiled. Personnel must take care not to touch their mask. Hand sanitizer should be available for the employees conducting the screening.
- 3. Instruct employee to check his or her body temperature before leaving for work every day and not report to work if his or her body temperature is 100.4° F or greater.
- 4. Instruct employee to self-monitor for symptoms and follow CDC instructions if symptoms are present (provide handout).
- 5. Use a thermometer designed to obtain body temperature of adults. Follow manufacturer's instructions regarding the use of probe covers for infection control, cleaning between uses, and proper technique in obtaining the body temperature. Ensure employee has not taken fever reducing medication such as Tylenol, Aspirin, or Advil in the 8 hours prior to obtaining the body temperature. Ensure employee has not eaten, drank, smoked, or chewed gum in the 15 minutes prior to testing body temperature. Obtain the body temperature reading as per manufacturer's instructions. Re-check body temperatures that are below 97°F or above 99°F. Employees whose body temperature registers at or above 100.4°F must return home and be provided with CDC Guidance for follow up with their primary care physician or local health department.

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