

# WHAT EMPLOYERS NEED TO KNOW ABOUT SCREENING EMPLOYEES FOR COVID-19

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## ARE WE ALLOWED TO SCREEN EMPLOYEES FOR SYMPTOMS?

The Equal Employment Opportunity Commission (EEOC) has allowed for employers to screen employees for symptoms of COVID-19, including taking an employee's temperature. This is based on the Centers for Disease Control and Prevention (CDC) acknowledging community spread of COVID-19 and the attempts to mitigate its continued transmission. The ADA and Rehabilitation Act rules continue to apply, but they do not interfere with or prevent employers from following the recommended guidelines made by the CDC or state/local public health authorities about steps employers should take regarding COVID-19.

## ARE WE REQUIRED TO SCREEN EMPLOYEES FOR SYMPTOMS?

Several state governors have issued executive orders that include some version of a requirement to screen all employees for symptoms prior to entry to the facility each day. The requirement does not mandate temperature checks in most locations as part of the screening and allows a symptom question regarding fever as an option. Check local health department website for guidance on requirements. In states without an executive order the CDC now recommends that employers of critical infrastructure (essential) workers "should" screen their employees and all other employers "may" screen their employees for symptoms of COVID-19.

## ADDITIONAL THINGS TO CONSIDER

1. The process commonly includes questioning employees regarding symptoms, contacts and travel in addition to measuring body temperature.
2. The CDC has provided guidance regarding how to conduct the assessment in the "Reducing the Spread of COVID-19 in Workplaces" section located [here](#).
3. The responses and results are considered protected medical information and should be kept in the employees' confidential medical file for a minimum of three years.
4. Training for the employees performing the screening must include how to conduct the screening safely, the proper use of the PPE, confidentiality standards and proper use and interpretation of the thermometer if used.
5. A "no touch" type of thermometer designed for measuring human body temperature is recommended, if employees that are not qualified healthcare personnel, to take temperatures. Any non-invasive type (no touch, temporal, tympanic, oral, etc.) that is FDA approved for human body temperature measurement is allowed. All types are required to be used and disinfected according to manufacturer's instructions and CDC guidance.
6. A non-routine task hazard assessment should be completed and documented if employees will be conducting the screenings.
7. Acknowledge that people with COVID-19 do not all have a fever (100.4F or greater) and that not all people with a fever (100.4F or greater) have COVID-19.
8. Employee screening is not a substitution for implementation of all other recommended infection control guidance such as social distancing, hand washing, enhanced cleaning protocols and PPE.

Employers should remember that guidance from public health authorities and OSHA is likely to change as the COVID-19 pandemic continues to evolve. Therefore, employers should continue to follow the most current information on maintaining workplace safety.

Thank you for visiting our COVID-19 Resource Center. We are committed to identifying, developing and updating resources to help the manufacturing community respond to the coronavirus pandemic. If you need more information, please email: [covidresponse@uscompliance.com](mailto:covidresponse@uscompliance.com). Thank you for your support and we look forward to working through this challenge together!