

## **Risk Management Considerations for Conducting Health Screenings During Pandemic**

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As Illinois moves into more progressive reopening phases, IRMA offers considerations for members as employees, customers, and program participants return to facilities for work and other activities. While taking temperatures is a way of screening for illness, employers should be aware that many people with COVID-19 do not present with a fever. Whether screening for fevers will be part of a return to work plan, it is important to prioritize having a plan of action in place if any individual confirms that they do have COVID-19 symptoms or feel ill. Employers should mandate immediate reporting by employees of scheduled COVID-19 tests, test results or any illness symptoms for themselves and those persons with whom they live. Encourage employees and the public to stay at home if exhibiting COVID-19 or any illness symptoms, are awaiting medical test results, or are confirmed to be infected with COVID-19. Additionally, measures should be in place for tracing outbreak and potential exposures in accordance with local health department guidance.

### **Privacy Considerations**

While the Equal Employment Opportunity Commission (EEOC) does normally consider temperature screening a medical examination and documenting those results would then result in a medical record, municipal members are not considered a covered entity or a business associate under HIPAA and therefore are not subject to HIPAA when taking and recording temperatures of employees, the public, or program participants during a pandemic (exception remains for fire service operations when transporting and caring for patients).

Even though IRMA members are not “covered entities” under HIPAA, it is important to prevent stigma and discrimination in the workplace and make health screenings as private as possible. Do not make determinations of risk based on race or country of origin and maintain confidentiality of each individual’s medical status and history. If an employee is determined to have symptoms consistent with COVID-19, inform employees of their possible exposure to COVID-19 in the workplace, but maintain confidentiality as required by the Americans with Disabilities Act (ADA). Like employee screenings, confidentiality must be considered when notifying the public of potential or confirmed exposure cases as well. Coordinate with local health departments when non-employee contact tracing and notification is necessary.

### **Employee Screenings**

The Center for Disease Control (CDC) and state/local health authorities have acknowledged community spread of COVID-19 and issued precautions, therefore, employers may measure employees' body temperature under [EEOC Guidance](#). Other screening measures can be used as well that do not include employer’s taking temperatures such as [surveying employees](#) if they have the common [COVID-19 symptoms](#). If temperature screenings will be utilized, purchase touchless temperature devices to be used by the employee prior to entering the facility or encourage self-monitoring for symptoms and immediate reporting before reporting to work.

## General Public Screenings

The CDC recognizes temperature screenings as a health measure for the public. Self-monitoring and touchless screening devices are becoming more available for purchase, however, if monitoring the public for symptoms through temperature screening is infeasible, utilize other best practice solutions. These best practices include:

- Posting signs at facility entrances discouraging entry if any illness symptoms are present.
- Placement of additional cleaning and disinfectant supplies in public areas.
- Requiring all individuals entering facilities should adhere to the 6-foot social distance rules & follow current face covering mandates.
- Drafting a plan for enforcement and refusal of entry to any individual exhibiting signs of illness or not following face covering and social distance guidelines.
- Designating specific staff that will monitor compliance with the current guidelines.

## Program Participant Screening

As part of program registration, provide registrants of camps, swimming, and other programmed activities with a waiver that allows program coordinators to screen and monitor for symptoms of illness prior to and upon entry into a program or activity. Ensure the waiver includes hold harmless language, a method of notification if symptoms arise, and return to activity protocols if symptoms are identified in a participant. A sample waiver is attached. Some employers may already have current in-place health screening forms that can be modified to include screening for COVID-19 symptoms.

## How to Safely Conduct Temperature Screenings (As outlined by the CDC)

If implementing in-person health checks, conduct them respectfully and in a way that helps maintain social distancing guidelines, such as providing multiple screening entries into the building. Employers may elect to transfer risk by utilizing health service professionals to conduct health screenings at their workplace. All screenings should be done with the use social distancing, barrier or partition controls, or personal protective equipment (PPE) to protect the screener. However, reliance on PPE alone is a less effective control and is more difficult to implement, given PPE shortages and training requirements.

- **Rely First on Social Distancing:** Ask individuals to take their own temperature either before coming to the facility or upon arrival. Upon their arrival, stand at least 6 feet away from them
  - Then:
    - Ask them to confirm that their temperature is less than 100.4° F (38.0° C) and confirm that they are not experiencing coughing or shortness of breath.
    - Make a visual inspection for signs of illness, which could include flushed cheeks or fatigue.
    - Screening staff do not need to wear personal protective equipment (PPE) if they can always maintain 6 feet distance.
- **Utilize Barrier/Partition Controls:** During screening, the screener stands behind a physical barrier, such as a glass or plastic window or partition. Upon arrival, the screener should wash hands with soap and water for at least 20 seconds or, if soap and water are not available, use hand sanitizer with at least 60% alcohol.

Then:

- Make a visual inspection of the individual for signs of illness, which could include flushed cheeks or fatigue.
- Conduct temperature and symptom screening using this protocol:
  - Put on disposable gloves.
  - Check the individual's temperature, reaching around the partition or through the window. Make sure the screener's face always stays behind the barrier during the screening.
  - If performing a temperature check on multiple individuals, make sure that you use a clean pair of gloves for each screening and that the thermometer has been thoroughly cleaned in between each check.
    - If disposable or non-contact thermometers are used and you did not have physical contact with an individual, you do not need to change gloves before the next check.
    - If non-contact thermometers are used, clean and disinfect them according to manufacturer's instructions and facility policies.
  - Remove and discard PPE (gloves), and wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer with at least 60% alcohol.
- **Rely on Personal Protective Equipment (PPE) as a last resort:** Upon arrival, the screener should wash their hands with soap and water for at least 20 seconds or use hand sanitizer with at least 60% alcohol, put on a facemask, eye protection (goggles or disposable face shield that fully covers the front and sides of the face), and a single pair of disposable gloves. A gown could be considered if extensive contact with an employee is anticipated.

Then:

- Make a visual inspection of the individual for signs of illness, which could include flushed cheeks or fatigue, and confirm that the employee is not experiencing coughing or shortness of breath.
- Take the individual's temperature.
  - **If performing a temperature check on multiple individuals, make sure that you use a clean pair of gloves for each check and that the thermometer has been thoroughly cleaned in between each check.** If disposable or non-contact thermometers are used and you did not have physical contact with an individual, you do not need to change gloves before the next check. If non-contact thermometers are used, you should clean and disinfect them according to manufacturer's instructions and facility policies.
- After each screening, remove and discard PPE and wash hands with soap and water for at least 20 seconds or use hand sanitizer with at least 60% alcohol.

#### **Resources:**

[CDC - Symptoms of Coronavirus](#)

[EEOC - Pandemic Preparedness in the Workplace and the Americans with Disabilities Act](#)

[IDPH Temperature and Health Screening Guidance](#)

[IDPH Phase 3 Business Tool Kit](#)

[CDC - Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 \(COVID-19\), May 2020](#)

[Sample Pre-Camp Screen Tool](#)

[Sample Health Screen Form](#)