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COVID-19 Model Screening Policy
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COVID-19 Model Screening Policy

Pursuant to guidance from the Equal Employment Opportunity Commission (“EEOC”), it is permissible for employers to screen employees by conducting temperature checks during the COVID-19 pandemic. Employers seeking guidance on how to safely conduct such screenings can consult the Centers for Disease Control and Prevention’s recommended approaches, which are available here. In addition, employers may wish to retain a medical professional to train screeners on safely conducting temperature checks as well as the proper use of personal protective equipment. Employers will also want to ensure that all screeners are trained to protect the confidentiality of employee medical information as required by the Americans with Disabilities Act. Finally, because not all individuals infected by COVID-19 have a fever, it is important for employers to adopt other protective measures for the workplace.

Below is a sample policy for employers seeking to implement a screening policy for their employees through the use of a daily temperature check. This policy is designed to be implemented in conjunction with HEC’s COVID-19 Model Return to Work Policy, which includes a sample Health Self-Declaration.

Please consult with your Human Resources Consultant for advice regarding tailoring this policy to your specific circumstances. Please note that the way you modify this policy may implicate employment laws.

[Company] is committed to maintaining a safe and healthy workplace. As indicated in [Company’s] COVID-19 Return to Work Policy, all employees are required to complete a Health Self-Declaration every week. As an added precaution, effective immediately and until further notice, [Company] will be taking the temperatures of all employees upon their arrival to the workplace as follows:

1. All employees should report to [location] immediately upon arrival at work and prior to entering any other areas of [Company] property.
2. Each employee will be screened privately by [name/position] using a [type of thermometer]. The employee’s temperature will be documented and the record will be maintained as a confidential medical record.
3. Any employee who has a fever at or above 100.4 degrees Fahrenheit will be sent home. All employees must receive approval from Human Resources before returning to work.1
4. Nonexempt employees should record screening time as time worked.

Please contact Human Resources at [number/email] with any questions.

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1 The CDC provides employers with industry-specific guidance for when an employer can safely return employees to work. The CDC’s guidance for healthcare personnel is available here. CDC guidance for returning critical infrastructure workers to the workplace is available here. Finally, CDC guidance for returning employees to the workplace in other industries is available here.