Health Screening & Temperature Check Resources

*Please note that this document is a compilation of resources from the NYS Department of Health, NYS Office of Mental Health, the Center for Disease Control and Prevention, and other organizations that have provided helpful guidance. If your contracting agency has sent guidance on health screenings and temperature checks, please refer to their guidance.*

I. The NYS Office of Mental Health released Infection Control Guidance for Reopening Public Mental Health System Sites. Program applicability is defined by section in their guidance document. Please refer to their document for more information.
   o One day prior to any in-person appointment all clients should be contacted by telephone and be asked the following three questions. If a client cannot be reached by phone, these screening questions must be asked upon arrival before the client enters the facility:
     ▪ 1. Have you had contact with any persons with confirmed or suspected CLI within the last 14 days?
     ▪ 2. Have you had any symptoms of CLI within the last 14 days? and
     ▪ 3. Have you had a positive diagnostic PCR COVID-19 test in the last 14 days?
   o If the client answers YES to any of these questions, the client should as much as possible be seen via telemental health. The client should be instructed to remain at home as much as possible and contact their healthcare provider.
   o If the client must be seen in person, follow guidance below.
     ▪ 1. Upon the client’s arrival, repeat above three questions from telephone screen. Clients must agree to screen in order to be allowed inside the facility. If clients refuse to participate, they should only be seen in an outdoor private area and must agree to wear a mask or cloth face covering. Staff should also wear masks.
     ▪ 2. Clients who answer YES to any of the above questions should be seen in a private, well-ventilated room with the door closed or, preferably, in a private outdoor area, and assessed by a program physician or nurse practitioner using appropriate PPE. If no qualified program medical staff is available, ask the client to contact their own healthcare provider as soon as possible. These clients should not wait with other clients in a waiting area.
     ▪ 3. Programs can use their discretion regarding whether to take clients’ temperatures prior to entering the treatment site. This decision should be made based upon each program’s staff capabilities and resources. If programs do not have thermometers available for screening on arrival to facility, clients may be asked to check their own temperature prior to coming for a visit. If a program decides to monitor temperatures, any individual with a temperature >100.0
should be given a mask and instructed to return home and contact their healthcare provider.

- 4. All clients should wear a mask or cloth facial covering while in the facility. If the client does not bring a cloth facial covering, staff should provide the patient with a disposable surgical mask to wear throughout the visit.
  - Staff undergo temperature monitoring and symptom checks upon arrival to work and at least every 12 hours while at work, and self-monitor (i.e. take temperature, assess for symptoms) twice a day when at home;
  - Staff members may use their own home thermometers to check their own temperatures; they are considered to have a fever if their temperature is over 100.0 degrees; if programs have infrared thermometers available, then staff temperatures may be checked using facility thermometers.

II. The NYS DOH released Interim Guidance for Child Care and Day Camp Programs During the Covid-19 Public Health Emergency. They also have a summary sheet with mandated requirements and best practices. Please refer to those documents for more information.

- All owners/operators of child-care and day camp programs should stay up to date with any changes to state and federal requirements related to child-care program and summer day camp entities and incorporate those changes into their operations. This guidance is not intended to replace any existing applicable local, state and federal laws, regulations and standards.
- Any time that counselors are fewer than 6 feet from each other or interacting with children/campers, they must wear a face covering.
- The size of the groups must be limited to no more than 10 children/campers (not including employees/staff), and to ensure that employee and children/camper groupings are as static as possible by having the same group of children/campers stay with the same staff whenever and wherever possible.
- Implement mandatory health screening assessment (e.g. questionnaire, temperature check) for employees, visitors (e.g. contractors, vendors), and children/campers, either directly or through their parent/guardian.
- The screening can be performed remotely (telephone, electronic survey) before the individual reports to the child care or day camp program, to the extent possible; or may be performed on site.
- For children/campers arriving to a program via bus transportation and for employees who provide supervision on the bus, screening must be completed prior to boarding the bus, where feasible.
- Screening should be coordinated to prevent individuals from intermingling in close or proximate contact with each other prior to completion of the screening.
- At a minimum, screening must be completed using a questionnaire that determines whether the individual has:
  - (a) knowingly been in close or proximate contact in the past 14 days with anyone who has tested positive for COVID-19 or who has or had symptoms of COVID-19;
  - (b) tested positive for COVID-19 in the past 14 days; and/or
  - (c) has experienced any symptoms of COVID-19 in the past 14 days.
- Require employees to make visual inspections of children/campers, throughout the day, for signs of potential COVID-19 illness which could include flushed cheeks, rapid breathing or difficulty breathing (without recent physical activity), fatigue, or extreme fussiness.
In addition to the screening questionnaire, daily temperature checks may also be conducted per U.S. Equal Employment Opportunity Commission or DOH guidelines. Responsible Parties are prohibited from keeping records of employee health data (e.g. temperature data).

Ensure that any personnel performing screening activities, including temperature checks, are appropriately protected from exposure to potentially infectious individuals seeking to enter the site. Personnel performing screening activities should be trained by employer-identified individuals who are familiar with CDC, DOH, and OSHA protocols. Screeners should be provided and use PPE, including at a minimum, a face mask, and may include gloves, a gown, and/or a face shield.

III. The NYS Department of Health released Interim Guidance for Office-Based Work During the Covid-19 Public Health Emergency. They also have a summary sheet with mandated requirements and recommended best practices. Please refer to those documents for more information.

Implement mandatory daily health screening practices of their employees and, where practicable, visitors, but not mandated for delivery personnel. At a minimum, the health screening should determine whether the employee has:

- (a) knowingly been in close or proximate contact in the past 14 days with anyone who has tested positive for COVID-19 or who has or had symptoms of COVID-19;
- (b) tested positive for COVID-19 in the past 14 days; and/or
- (c) has experienced any symptoms of COVID-19 in the past 14 days.

- Tip from Cozen O’Connor: Employers should create written policies that specifically outline the temperature and health screening requirements that will be implemented throughout the pandemic. The policy should provide employees with an explanation of the temperature screening process and the purpose underlying such a policy (ensuring the safety and health of employees in the workplace) and should inform the employees of the location of the screening, and of the potential consequences of the screening (i.e., that employees registering a temperature of 100.4 degrees or higher and/or experiencing other symptoms of COVID-19 will be sent home and not be allowed to return to the workplace until certain conditions are satisfied) as recommended by the CDC or the employee’s health care provider.

Screenings could be performed remotely (telephone, electronic survey) before the employee or visitor reports to the office, or may be performed on site.

Onsite Screenings should be coordinated to prevent employees or visitors from intermingling in close contact with each other prior to completion of the screening. Allow for adequate social distancing while individuals queue for screening and/or building entry.

- Tip from the National Law Review: They recommend that employers compensate employees for any time spent waiting to be screened and participating in the screening process in order to comply with the Fair Labor Standards Act (“FLSA”) and state wage and hour laws.
- Tip from Morgan, Brown & Joy: They recommend that employers should not pick and choose who to test; rather every employee entering the workplace, every day, should be tested. Testing should be administered on a non-discriminatory basis.
In addition to the screening questionnaire, daily temperature checks may also be conducted per U.S. Equal Employment Opportunity Commission or DOH guidelines.

Responsible Parties are prohibited from keeping records of employee health data (e.g. temperature data).

Responsible Parties must review all employee and visitor responses collected by the screening process on a daily basis and maintain a record of such review.

- **Tip from Cozen O’Connor:** They recommend that if employers do not log the exact temperature at all, they can record the time the employee was tested, the employee’s name, and that the employee registered a fever because of employees’ privacy rights.

- **Tip from the EEOC:** The ADA requires all medical information about a particular employee be stored separately from the employee’s personnel file, thus limiting access to this confidential information.

- **Tip from the National Law Review:** They recommend that employers consider how to best protect the privacy of those employees who are found to have an elevated temperature and need to be sent home (e.g., allowing for an inconspicuous exit, private screening, drive-through screening, etc.).

Personnel performing screening activities should be trained by employer-identified individuals who are familiar with CDC, DOH, and OSHA protocols. Screeners should be provided and use PPE, including at a minimum, a face mask, and may include gloves, a gown, and/or a face shield.

- **Tip from the National Law Review:** They recommend that screeners should be trained on how to safely complete temperature screens, the proper use and disposal of PPE, and maintaining employee privacy. They recommend that screeners sign a document establishing the protocol, requiring confidentiality of employee medical information, and confirming that the individual has been informed of and consents to the risks of serving as a screener.

IV. **The CDC** suggested 3 methods of administering temperature checks:

- **Reliance on Social Distancing:** Ask employees to take their own temperature either before coming to the workplace or upon arrival at the workplace. Upon their arrival, stand at least 6 feet away from the employee and:
  - Ask the employee 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 of the employee 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 maintain a distance of 6 feet.

- **Reliance on Barrier/Partition Controls:** During screening, the screener stands behind a physical barrier, such as a glass or plastic window or partition, that can protect the screener’s face and mucous membranes from respiratory droplets that may be produced when the employee sneezes, coughs, or talks. 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 employee 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 employee’s temperature, reaching around the partition or through the window. Make sure the screener’s face stays behind the barrier at all times during the screening.
- If performing a temperature check on multiple individuals, make sure that you use a clean pair of gloves for each employee 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.
- If social distance or barrier controls cannot be implemented during screening, PPE can be used when the screener is within 6 feet of an employee during screening. However, reliance on PPE alone is a less effective control and more difficult to implement given PPE shortages and training requirements.
  - Reliance on Personal Protective Equipment (PPE): 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 employee 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 employee’s temperature.
    - If performing a temperature check on multiple individuals, make sure that you use a clean pair of gloves for each employee 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.