

RECOMMENDED GUIDELINES AND CHECKLIST FOR AGENCIES ADMINISTERING COVID-19 SYMPTOMS QUESTIONING AND TEMPERATURE SCREENING FOR CITY EMPLOYEES

PURPOSE:

Agencies may wish to employ temperature screening during the COVID-19 emergency as one of several measures to reduce the possibility of transmission. Temperature screening is not required and, because individuals may be infected without having an elevated temperature, should not be used as a substitute for social distancing, hand washing and other critical measures to prevent transmission.

It is advisable for all agencies, regardless of whether they are screening temperature at the workplace, to urge their employees to monitor their temperature daily before they come to work in order to reduce the number of employees who may come to work with elevated temperature.

The guidelines below are intended to serve as a model policy for agencies that choose to adopt temperature screenings. The guidelines are designed to help agencies efficiently administer temperature screening and question employees about possible exposure to COVID-19 and symptoms they may be experiencing, in a respectful, discreet, and confidential way that complies with federal, state and local law. These guidelines are only intended to be used during the course of the COVID-19 pandemic. Some practices listed below may not be appropriate or lawful outside the scope of this pandemic.

Agencies can adapt the policy below as necessary to meet their particular logistical needs, provided that the adaptation of the policy is consistent with the legal principles described in this document. Agencies that choose to employ temperature screenings must make appropriate logistical arrangements to carry out the screenings in a manner consistent with the legal principles articulated below.

SCOPE:

This procedure checklist applies to all City staff (or individuals who have contracted with the agency) who will be administering temperature checks on employees entering City worksites. Separate guidance will be issued concerning visitor temperature screening.

If an agency chooses to employ temperature screening at a particular worksite, temperature screening must be conducted for all employees upon entering at that site at the start of each work day/tour. Agencies should consider whether to schedule a second check for employees working extended/multiple tours.

This guidance applies during the COVID-19 emergency declared in March, 2020. Please note that, outside the scope of a pandemic emergency, federal, state and local law generally prohibit an employer from screening its employees' temperatures.

A. QUESTIONS TO ASK:

When employees arrive at the designated entrance for their temperature screening, these questions should be posed to all. There are options for posing the questions. The questions may be posed verbally by a screener. It may be more efficient and more discreet to have the list of symptoms and the questions enlarged on a clearly visible poster near the temperature check line.

Then, the screener can just refer to the poster and ask an abbreviated form of the questions. Alternatively, agencies may hand a form with these questions to the employee for the employee to fill out and hand to the screener. The form should not, however, identify the employee by name.

1. Have you, or someone you have been in close contact with, experienced any of these symptoms for the first time in the last 7 days? Answers should be limited to “Yes, I have one or more,” or “No, I don’t have any.” (The employee does not have to indicate which symptom(s) they have):
 - a. Fever
 - b. Cough
 - c. Shortness of breath or difficulty breathing
 - d. Sore throat
 - e. Chills
 - f. Muscle pain
 - g. New loss of taste or smell¹
2. Are you currently experiencing any of the symptoms in described in Question 1?

B. NEXT STEPS AFTER ASKING QUESTIONS 1 AND 2 IN PART A

1. An employee should be sent home (on sick leave or excused leave as appropriate) and directed to contact your agency’s designated medical or human resources employee coordinating temperature screening (“temperature coordinator”) for further instruction if the employee answered YES to one or more of the above symptoms in Questions 1 AND 2 of Part A. Every employee who has not been directed to go home after responding to Questions 1 and 2 of Part A should then be screened for temperature.
2. For all employees who have a temperature less than 100.4 and who have answered NO to Questions 1 and 2 of Part A, no further questions may be asked of the employee and the employee should be directed to proceed to work.
3. For any employee who has a temperature from 100.0 to 100.3 and has answered YES to either Question 1 or 2 of Part A, the screener may ask the following questions.
 - a. Have you exercised within the past thirty minutes?
 - b. Have you eaten or had anything to drink within the past thirty minutes?
 - c. Have you taken any aspirin, ibuprofen, or acetaminophen within the past six hours?
 - d. Do you have a pre-existing condition or take medication(s) that causes you to experience any of the symptoms listed in Question 1.

¹ This list is not an exhaustive list of all possible symptoms. Other less common symptoms include gastrointestinal symptoms like nausea, vomiting, or diarrhea. Agencies should check the DOHMH, New York State Department of Health and CDC websites periodically to confirm whether there are any symptoms added or deleted from the common symptoms list.

If the answer to any of the above questions is YES, take the employee's temperature again. If the employee's temperature remains below 100.4, the employee should be provided a facial mask and any other protective equipment deemed necessary by the employer and allowed to proceed to work.

4. Any employee who has a temperature greater than 100.3 and answered YES to either Question 1 or 2 of Part A should be sent home (on sick leave or excused leave as appropriate) and directed to contact your agency's temperature coordinator for further instruction.

All employees should be advised either by the screener or in the screening poster that refusal to take part in the screening process will result in the employee's being sent home for the day. The employee should take paid (excused, sick or annual) leave, or leave without pay, based on the leave guidelines promulgated by DCAS. If the employee refuses to cooperate, the employee may be subjected to disciplinary action as appropriate.

C. WHO SHOULD ASK:

The questions should be asked by an employee of the agency or by someone who, by agreement with the agency, is obligated to maintain the confidentiality of the temperature readings and other pertinent information and who may only share the results with the agency. For ease of reference, we will refer to this individual as the "screener." (Where several City agencies occupy the building, they may enter an agreement about which agency's employees will perform the screening.) The screener must ask each employee the approved screening questions.

Screeners may not make any inquiries not outlined in the above guidelines.

The screener should be a designated employee of the agency (or a contractor of the agency) who is familiar with COVID health and safety issues and has received training concerning the subject matter of these guidelines.

D. STEPS WHEN SCREENING:

1. Maintain a line in which employees are six feet apart.
2. It is preferable that the screening be done in a location that prevents employees from entering confined spaces in the building such as an elevator to the extent that is logistically possible.
3. The screening should be designed, as best as practicable, to avoid allowing others hear what is being said and to minimize the observation of the screening by others.
4. Only use a non contact thermometer such as an infrared forehead thermometer or infrared scanner.
5. Do not use oral or tympanic thermometers (tympanic thermometers use a probe that goes in the ear).
6. All screeners should wear facial coverings and gloves when conducting screening.
7. All screening areas should have a supply of alcohol wipes to sanitize any equipment that comes in contact with an individual.

8. The screener should not provide any medical advice.

E. IMPORTANT NOTE REGARDING PRIVACY:

Information solicited during the screening process, including temperatures, is protected under the Americans with Disabilities Act. Whoever is asking the above questions must do so in a respectful, discreet, and confidential way so as to protect the privacy of person being questioned. Additional discussion, if necessary, should be done in private. The answers given should only be shared with those designated staff who are in the ‘need to know’ chain of command. Screeners must follow the agency’s instructions for collecting the information and sending it to where the employee’s personal health information is privately and separately maintained from other personnel records.

Generally speaking, agencies should not maintain a record of the specific temperature readings, although the fact that an employee was asked during screening to go home can be documented for leave purposes. All information collected from any employee must be kept confidential and can only be maintained in the employee’s medical or health file, in the same manner as the agency maintains medical notes collected for leave purpose. These records are kept separate from the employee’s personnel file.

ADDITIONAL RESOURCES:

CDC Symptoms List and Self-Checker: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

NYC Department of Health and Mental Hygiene Symptoms List:
https://www1.nyc.gov/site/doh/covid/covid-19-symptoms-chronic-health-risks.page?utm_source=Google_Search&utm_medium=English&utm_campaign=Coronavirus&utm_content=Sitelink1

NYS Department of Health Reopening Guidance: <https://forward.ny.gov/industries-reopening-phase>

CDC Symptoms Poster: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/COVID19-symptoms.pdf>