

COVID-19 Employee Testing Strategy

Considerations for the Workplace

This document is designed to provide employers with strategies for consideration of incorporating testing for COVID-19 into a workplace COVID-19 preparedness, response, and control plan.

Employers are encouraged to collaborate with state, territorial, tribal and local health officials to determine whether and how to implement the following testing strategies and which one(s) would be most appropriate for their circumstances. These considerations are meant to supplement, not replace, any federal, state, local, territorial, or tribal health and safety laws, rules, and regulations with which workplaces must comply. These strategies should be carried out in a manner consistent with law and regulation, including laws protecting employee privacy and confidentiality.

Considerations: Use of a Strategy to Test for COVID-19

Testing may be incorporated as part of a comprehensive approach to reducing transmission in workplaces. Symptom screening, testing, and contact tracing are strategies to identify workers infected with COVID-19 so that actions can be taken to slow and stop the spread of the virus.

Employees undergoing testing should receive clear information on:

- ▲ the manufacturer and name of the test, the type of test, the purpose of the test, the reliability of the test, any limitations associated with the test, who will pay for the test, and how the test will be performed, and
- ▲ how to understand what the results mean, actions associated with negative or positive results, who will receive the results, how the results may be used, and any consequences for declining to be tested.

Testing for COVID-19 Infection

Viral tests approved or authorized by the Food and Drug Administration (FDA) are used to diagnose current infection. Viral tests evaluate whether the virus is present in respiratory or other samples.

Antibody tests approved or authorized by the FDA are used to detect past infection. CDC does not currently recommend using antibody testing as the sole basis



for diagnosing current infection. Depending on when someone was infected and the timing of the test, the test may not find antibodies in someone with a current COVID-19 infection. In addition, it is currently not known whether a positive antibody test indicates immunity against COVID-19; therefore, antibody tests should not be used at this time to determine if an individual is immune.

Categories for COVID-19 Testing

- a. Testing individuals with signs or symptoms consistent with COVID-19
- b. Testing asymptomatic individuals with recent known or suspected exposure to COVID-19 to control transmission
- c. Testing asymptomatic individuals without known or suspected exposure to COVID-19 for early identification in special settings
- d. Testing to determine resolution of infection (e.g., discontinuation of home isolation)

1. Testing individuals with signs or symptoms consistent with COVID-19

Employers may consider conducting daily in-person or virtual health checks (e.g., symptom and/or temperature screening) to identify employees with signs or symptoms consistent with COVID-19 before they enter a facility, in accordance with CDC's General Business FAQs.

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Workers with COVID-19 symptoms should be immediately separated from other employees, customers, and visitors, and sent home or to a healthcare facility, depending on how severe their symptoms are, and follow CDC guidance for caring for oneself. To prevent stigma and discrimination in the workplace, make employee health screenings as private as possible. Consistent with CDC's recommendations, workers with COVID-19 symptoms should be referred to a healthcare provider for evaluation and potential testing. Waiting for test results prior to returning to work is preferred to keep potentially infected workers out of the workplace.

Positive test results using a viral test indicate that the employee has COVID-19 and should not come to work and should isolate at home. Decisions to discontinue home isolation for workers with COVID-19 and allow them to return to work may follow either a symptom-based, time based, or a test-based strategy (see Testing to determine resolution of infection below).

2. Testing asymptomatic individuals with recent known or suspected exposure to COVID-19 to control transmission

Case investigation is typically initiated when a health department receives a report from a laboratory of a positive COVID-19 viral test result or a report from a healthcare provider of a patient with a confirmed or probable diagnosis of COVID-19.

Viral testing is recommended for all close contacts of persons with COVID-19. Because of the potential for asymptomatic and pre-symptomatic transmission of the virus, it is important that individuals exposed to people with known or suspected COVID-19 be quickly identified and quarantined. Viral testing can detect if these individuals are currently infected. The health department may reach out to the employer for assistance in identifying close contacts of the worker as well as possible contacts. Employers are encouraged to work with public health departments investigating cases of COVID-19 and tracing contacts to help reduce the spread of COVID-19 in their workplaces and communities.

Testing may also be considered for possible close contacts of persons diagnosed with COVID-19 in collaboration with the local health department if resources permit. A risk-based approach to testing possible contacts of a person with confirmed COVID-19 may be applied. Such an approach should take into consideration the likelihood of exposure, which is affected by the characteristics of the workplace and the results of contact investigations.

If employees are tested after close contact or possible close contact with someone who has a confirmed or probable diagnosis of COVID-19, care should be taken to inform these employees of their possible exposure in the workplace while maintaining confidentiality of the individual with COVID-19, as required by the Americans with Disabilities Act (ADA).

3. Testing asymptomatic individuals without known or suspected exposure to COVID-19 for early identification in special settings

Viral testing of workers without symptoms may be useful to detect COVID-19 early and stop transmission quickly, particularly in areas with moderate to substantial community transmission. When communities experience moderate to substantial transmission, workplace settings for which these approaches may be considered include:

- ▲ Workplaces where physical distancing is difficult and workers are in close contact (within 6 feet for 15 minutes or more) with co-workers or the public
- ▲ Workplaces in remote settings where medical evaluation or treatment may be delayed
- ▲ Workplaces where continuity of operations is a high priority (e.g., critical infrastructure sectors)
- ▲ Workplaces providing congregate housing for employees (e.g. fishing vessels, offshore oil platforms, farmworker housing or wildland firefighter camps)

Approaches may include initial testing of all workers before entering a workplace, periodic testing of workers at regular intervals, and/or targeted testing of new workers or those returning from a prolonged absence. Several factors may be helpful in determining the interval for periodic testing including:

- ▲ The availability of testing
- ▲ The latency between exposure and development of a positive COVID-19 viral test
- ▲ Businesses that fall into one of the workplace categories described above
- ▲ The rate or change in rate of people getting infected in the surrounding community
- ▲ How many employees tested positive during previous rounds of testing
- ▲ Your relevant experience with workplace outbreaks

State, local, territorial, and tribal health departments may be able to provide assistance on any local context or guidance impacting the workplace. Before testing a large proportion of asymptomatic workers without known or

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suspected exposure, employers are encouraged to have a plan in place for how they will modify operations based on test results and manage a higher risk of false positive results in a low prevalence population.

4. Testing to determine resolution of infection

The decision to end home isolation and return to work for employees with suspected or confirmed infection should be made in the context of clinical and local circumstances. In most cases, evidence supports a symptom-based strategy to determine when to discontinue home isolation or precautions. For persons who are severely immunocompromised, a test-based strategy could be considered in consultation with infectious diseases experts. For all others, a test-based strategy is no longer recommended except to discontinue isolation or precautions earlier than would occur under the symptom-based strategy.

Employers are permitted to require a healthcare provider's note to verify that employees are healthy and able to return to work. However, as a practical matter, employers should be aware that healthcare provider offices and medical facilities may be extremely busy during periods of community transmission of COVID-19 and may not be able to provide such documentation in a timely manner. In such cases, employers should consider not requiring a healthcare provider's note for employees who are sick to validate their illness, qualify for sick leave, or to return to work. Most people with COVID-19 have mild illness, can recover at home without medical care, and can follow CDC recommendations to determine when to discontinue home isolation and return to work.

These interim considerations on COVID-19 testing strategies for workplaces during the COVID-19 pandemic are based on what is currently known about the transmission and severity of COVID-19 as of July 22, 2020. The US Centers for Disease Control and Prevention (CDC) will update these considerations as needed and as additional information becomes available.

REMINDER: 10 Rules for Safety

1. You are responsible for your own SAFETY and the SAFETY of others.
2. ALL Accidents are preventable.
3. Do not take shortcuts – always follow the rules.
4. If you are not trained do not do it.
5. Use the right tools and equipment for the job.
6. Assess the risks before you approach the work.
7. Never wear loose clothing or slippery foot wear.
8. Do not indulge in horseplay while at work.
9. Practice good housekeeping.
10. Always wear all appropriate PPE for the job.

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