



EMPLOYEE HANDBOOKS

Symptom Monitoring and Contact Tracing

Revised: May 2020

Important Notice:

The information provided herein is general in nature and designed to serve as a guide to understanding. These materials are not to be construed as the rendering of legal or management advice. If the reader has a specific need or problem, the services of a competent professional should be sought to address the particular situation.

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I. Considerations

LEGAL CONSIDERATIONS

Most every state, including Arizona, Colorado, Utah, and Wyoming, are suggesting or requiring symptom checks as a way for employers and others to know if COVID-19 is present in a workplace. The most typical symptom check is to take employees' temperatures to see if it is normal, or 98.6 degrees Fahrenheit. Employers are also being asked to track this information to help create a strong foundation for contact tracing.

In Colorado, all employers must implement symptom monitoring protocols (including workplace temperature monitoring and symptom screening questions) where possible. Colorado employers with over 50 employees must implement those protocols by:

- Setting up stations at the worksite for symptom screening and temperature checks; OR
- Creating a business policy that requires at-home employee self-screening each work day and reporting of the results to the employer prior to entering the worksite.

If you appoint employees to gather the data, they must be instructed to keep employee temperature and symptom information strictly confidential. It is best for the employee to sign a statement indicating they understand the information is confidential and violating this may be grounds for discipline or discharge. This statement is separate from the handbook.

REPORTING OF POSSIBLE INFECTION

Whether the employee's temperature is taken at work or self-monitored at home, if an employee has a temperature over 100.4 degrees, they must report symptoms to their state authorities:

Arizona is implementing a secure, automatic 14-day symptom monitoring and reporting system, and there is more information on their [health department website](#).

In Colorado, if an employee reports any symptoms, refer symptomatic employees to the [CDPHE Symptom Tracker](#).

In Utah there is a [Healthy Together App](#) to track symptoms.

ADMINISTRATIVE CONSIDERATIONS

Some questions to ask include:

Q: Does the employer have to be the one to take the temperatures?

A: Ideally, the answer is yes, as employers can then be assured that they have accurate temperature information. Be sure to understand protocols concerning cleaning thermometers between uses. More detailing information about taking temperatures can be found on CDC and state government websites.

Q: How often should temperatures be taken?

A: Temperatures should be taken once a day. The Colorado state recommendation is if the temperature is above 99.6, the temperature should be taken twice a day for the next seven days.

Q: At what point should an employee be sent home due to their temperature?

A: The CDC and some state recommendation is 100.4 degrees. Some institutions are requiring those with a temperature of 100 to leave their premises.

Q: Can employees take their own temperature?

A: Yes. While employers may have greater assurance of accurate readings if they take temperatures directly, you can require employees to take their own temperature and report the results.

Q: Can we require job candidates to take their temperature, or allow us take their temperature?

A: Yes, you can require candidates to take their own temperature or submit to a temperature check before coming on your premises.

Q: How do we log temperatures?

A: Detailed information about how to properly log temperatures can be found on state government websites. If employees are taking their own temperatures, they should have a form to fill in each day.

Q: Are there any precautions to take when logging temperatures?

A: Yes. Make sure you keep the logs confidential so that employee identities are not exposed.

Q: What kind of thermometers are best?

A: If you are doing screening at your workplace, a thermometer that you can place on the forehead is best because it can be cleaned between each use. For employees, a digital thermometer may be ideal. Thermometers with mercury can be difficult to read. If it is affordable, the employer may provide thermometers to employees.

Q: What if an employee has a temperature over 100.4 degrees?

A: Most employees must report symptoms to their state authorities. In addition, all employers should:

- Send symptomatic employees home immediately.
- Increase cleaning in your facility and require social distancing of staff at least six feet apart from one another.
- Exclude employees until they are fever-free, without medication, for 72 hours, and ten days have passed since their first symptom.
- If multiple employees have these symptoms, contact your local health department.
- Eliminate or regularly clean and disinfect any items in common spaces, such as break rooms, that are shared between individuals, such as condiments, coffee makers, vending machines.

II. Samples

EXAMPLE #1

SAMPLE SYMPTOM CHECKING AND CONTACT TRACING POLICY

To reduce the risk of spreading the COVID-19 virus in our workplace and to protect our employees and all those visiting our worksite, [COMPANY] is implementing temperature screening measures. In doing so, [COMPANY] will be following the guidelines issued by the Centers for Disease Control and Prevention (CDC) as well as our state and local agencies to ensure that all the appropriate safety and health steps are being taken during this time.

[If the employer will be taking temperature]

Beginning on [DATE], until further notice, employees entering the workplace will go through a temperature check station.

At this station:

- Each employee must wear a mask.
- An employee will be provided a thermometer to place against their forehead [OR An employee will have a thermometer placed against their forehead].
- After the thermometer is placed against the forehead, the thermometer is cleaned by the employee [OR staff using the thermometer].
- The employee is given a sheet of paper to log their temperature and this is turned into the staff noting temperatures.
- Employees must disinfect the thermometer that is placed on the forehead is disinfected between each use whether by the employee or attendant.

[If the employee must take their own temperature]

Until further notice, employees entering the workplace will take and record their temperature prior to entering the workplace. We would prefer you use a digital thermometer if you have one **[OR Please use the thermometer we have provided to you]**. Here is the [form to fill in each day](#). Please provide your weekly forms to **[HR or assigned Covid person]**.

Whether the employee's temperature is taken at work or self-monitored at home, if an employee has a temperature over 100.4 degrees, they will be **[sent home/asked to stay home]**. **[If remote work is available: If an employee is sent home with a fever, they may work remotely, as long as they are feeling well enough to do so.] OR [If an employee is sent home with a fever, the employee may use available [insert as applicable: paid time off (PTO), vacation and/or sick leave] [as well as paid sick leave offered under the Families First Coronavirus Response Act (if an FFCRA eligible employer)]. Please contact [your supervisor/human resources] for further information regarding eligibility and the application process.]**

Whether the employee’s temperature is taken at work or self-monitored at home, if an employee has a temperature over 100.4 degrees, they must report symptoms to their state authorities.

Employees sent home with a fever will not be permitted to return to work until:

- The employee certifies in writing that they are fever-free and has not experienced any symptoms (e.g., coughs, shortness of breath or any other symptom associated with COVID-19) for at least 72 hours; AND
- At least seven days have passed since the employee first began experiencing a fever or other COVID-19 related symptoms; OR
- The employee presents documentation from a health care professional confirming the employee may return to work, that the employee tested negative for COVID-19 and that any current symptoms are not related to COVID-19.

EXAMPLE #2

SAMPLE POLICY FOR EMPLOYEES GATHERING DATA

I _____ understand that the information I gather for temperatures from employees is confidential. I understand that I am not to release any of this data unless instructed to do so. I also understand that if I do release this data wrongfully, it will be grounds for discipline, up to and including termination.

Name

Date