

Health & Safety Alert



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COVID-19 Fit for Duty: Temperature Screening Protocol

The protocol outlined in this document is derived from two documents: one [published by the Construction Industry Safety Coalition \(see Appendix A\)](#), and the other [posted by the law firm of Foley & Lardner](#). The Centers for Disease Control and Prevention (CDC) and state and local health authorities have acknowledged the pandemic outbreak and resulting community spread of COVID-19. As such, the Equal Employment Opportunity Commission (EEOC) has [now acknowledged](#) that “employers may now measure employees’ body temperature.” As with all medical information, the fact that an employee had a fever or any other symptoms would be subject to the Americans with Disabilities Act (ADA) confidentiality requirements. Additionally, employers should carefully consider state and local requirements as to whether employees must be compensated for time spent having their temperature taken and waiting in line to do so.

The temperature screening protocol should be considered in conjunction with a standard documented health assessment questionnaire, like the [example](#) provided on [NAPA’s website](#) or these examples from the states of [South Dakota](#) and [Illinois](#). These employee COVID screening tools can be administered to employees on-site or remotely (electronically transmitted to their homes) and employers should document whether an individual employee has:

- Experienced a fever of 100.4° F or flu-like symptoms including respiratory illness or malady now or within the last 14 days;
- Experienced coughing, shortness of breath or difficulty breathing, chills, muscle pain, sore throat, or a new loss of taste or smell, all of which are documented symptoms of COVID-19;

BOTTOM LINE

- **Temperature scans should be considered in conjunction with standardized health assessment questionnaire screening.**
- **Use a “touchless” or contactless thermometer if at all possible.**
- **Ensure that the screener is provided with and wearing appropriate PPE.**
- **Determine the best way to “record” the temperature scan information.**
- **Notify any employee that has an elevated temperature of 100.4° F or higher and prohibit them from working for at least 14 days.**

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- Been in close contact with someone who has a suspected or confirmed COVID-19 diagnosis within the past 14 days;
- Been medically directed to self-quarantine due to possible COVID-19 exposure.

Types of Temperature Screening and Training

There are two options for how temperature screening can be conducted:

1. By the employee, at home, prior to leaving for work; or
2. By the employer, at the worksite, when the employee arrives to report for their shift.

The following protocol **assumes the second option**, taking the temperature of an employee at their worksite, and assumes that an employer’s representative (the “screener”) – preferably a management-level employee who is NOT a medical professional – is assigned the duty of taking an employee’s temperature. The screener should review the manufacturer’s instructions and directions for the thermometer or scanning equipment to ensure proper use. The screener should also be properly trained in utilizing the thermometer or scanning equipment and also be trained on how to follow-up in the event of an error or a result that is inconsistent with common sense (i.e., a reading that is much too low or too high). Any such training should be documented.

Because there are a variety of thermometers that can be used to assess an individual’s temperature, this protocol assumes the use of an infrared thermometer, either contactless (preferred) or not. If the screener is utilizing an oral or ear thermometer, please review the above-referenced documents. Regardless of the type of thermometer used, it is imperative that the thermometer is properly and thoroughly cleaned/disinfected prior to each temperature taken, in accordance with the manufacturer’s recommendations.

Personal Protective Equipment (PPE) and Privacy

- The employee should be provided privacy during the screening process with a screen or barrier.
- The employee being tested should wear a face covering or other respiratory protection.
- The screener should wear PPE while conducting the temperature screening. Such PPE should consist of the following: (i) a face covering or other respiratory protection; (ii) protective eyewear; (iii) rubber-type examination gloves; and (iv) an apron or smock.
 - If the thermometer used is not contactless or “touchless,” the screener must change their gloves with each scan.
- PPE should be discarded in a designated PPE bin. Other trash should not be discarded in the PPE bin. Employers should ensure the proper collection and disposal of the PPE bin.
- The screener should not take off their PPE until their temperature checking responsibilities have been completed. If the screener needs to leave the screening area prior to the completion of their temperature checking responsibilities, the screener should take off and discard their PPE prior to leaving the temperature screening area. The screener should put on a new set of PPE when the screener returns to the temperature screening area prior to taking anyone’s temperature. Some screener PPE, like

- Social distancing of 6-feet should be maintained by employees waiting to have their temperature taken as well as, if possible, between the screener and the employee being tested.

Documenting the Employee's Temperature

The CDC identifies an elevated body temperature at or above 100.4° F as a “fever” for purposes of COVID-19 and other reportable illnesses. Other state or local governments and agencies may set their own thresholds for what constitutes a fever and may dictate whether employers can disqualify an employee from entering the worksite.

While employers are permitted to take temperatures during the COVID-19 pandemic, if the temperature of an employee is “recorded,” that information must be maintained confidentially under the ADA.

- Employers should only record temperature readings at or above the 100.4° F threshold.
- Employers should not record temperatures below 100.4 ° F.
- The information that is recorded should be treated as a confidential medical document and not placed in any employee's personnel file.

If the employee tests positive for a fever, discreetly notify the employee they have a fever and move that employee to an isolated private space to discuss next steps. An additional temperature screen should be taken to verify the initial reading.

If, after retesting, the employee has a fever, do not allow them to enter the work environment. The employee should speak with a medical provider and begin quarantine procedures. The employee should not return to work for at least 14 days and any other requirements, per any state, local, or company-specific protocols. Upon an employee's return after quarantine, the employee should be screened along with the other employees according to the company's procedures and protocols.

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