

Employee Temperature Screenings

As employees across the country begin to return to their offices, some employers have implemented temperature screening protocols for employees prior to entering workplaces. The U.S. Equal Employment Opportunity Commission (EEOC) has issued guidance on this; in light of the pandemic, employers are permitted to measure employee's body temperature prior to entering workplaces.

Click [here](#) to read the full EEOC publication.

Keep in mind that not all people with COVID-19 will have a fever, or display any other symptoms for that matter. Should your organization decide to conduct employee temperature screenings, protocols and defined program guidelines should be established.

- Determine who your organization will screen. Will all employees be required to have their temperatures measured prior to entering your facility? Will all contractors, service providers, and visitors be subject to temperature screenings as well? Regardless of who your organization untimely decides to screen, ensure this is consistently followed to avoid any legal implications.
- Communicate in advance with your employees regarding temperature screening procedures and any potential implications (i.e. being sent home). Clearly state if screening refusal will result in denied entry into your facility and/or employee disciplinary action.
- Determine which type of thermometer will be used. Contact forehead thermometers are generally quick and accurate; however, they must be cleaned with a new alcohol wipe after each use. A non-contact infrared thermometer reduces the need for physical contact. Employees may prefer for their temperature to be measured using the least invasive method.
- Develop guidelines on temperature thresholds. The Centers for Disease Control and Prevention (CDC) considers a fever as any measured temperature over 100.4 degrees Fahrenheit. Setting a threshold will help your organization with administering a consistent and fair program.
- Maintain social distancing while conducting temperature screenings. Place visual markers to instruct individuals to maintain a distance of at least six feet between each other. If possible, stagger employee schedules to limit the number of employees arriving to be screened at one time.
- Provide clear instructions to an employee who is sent home due to elevated body temperature. Instructions should include when the employee may return to work, any procedures they must follow, if the employee will be permitted to work remotely, and eligibility for any type of paid or unpaid leave.

Identify the responsible party to conduct and administer the temperature screening program. The individual(s) conducting the temperature screenings will need to be supplied with personal protective equipment (PPE) since they would be in close contact with a large number of employees, including those that may be infectious. Per OSHA classifications, this task would likely be considered a high exposure risk. Most individuals conducting tasks at high exposure risk levels must wear gloves, a gown, a face shield or goggles, and either a face mask or a respirator. Training should also be provided on the appropriate use of PPE and how to safely and effectively discard PPE.

In addition to the safety precautions above, all information gathered during temperature screenings should be treated as confidential medical information under the Americans with Disabilities Act (ADA). Identify the information that will be documented for employees as a result of the temperature screening. Some organizations may decide to record only information on employees who did not pass the screening. It is recommended to work with your legal counsel and human resources as it relates to maintaining privacy and documentation requirements associated with a temperature screening program.

Due to the necessary safety precautions and potential legal implications, consider working with a third-party healthcare vendor to conduct and administer your temperature screening program. Some organizations may decide to take the approach of having employees self-administer temperature screenings while on site and provide the reading to a designated individual who has the authority to determine if the employee's temperature is above the set threshold and should be sent home. Organizations may also decide to allow employees to self-administer temperature screenings and report the results to a designated individual on a daily basis prior to entering the workplace. Keep in mind that this approach is dependent upon on employee good faith.

Organizations should monitor emerging requirements specific to temperature screenings, including guidance from state and local health authorities. Please contact your insurance representative should you have additional questions.

Sources

- **Centers for Disease Control and Prevention (CDC)**, [*Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 \(COVID-19\), May 2020*](#)
- **JD Supra**, [*Workplace Temperature Screening: How to Develop and Implement a Screening Protocol*](#)
- **Occupational Safety and Health Administration**, [*Guidance on Preparing Workplaces for COVID-19*](#)
- **Society for Human Resource Management**, [*A Guide to Employee Temperature Checks*](#)
- **WilmerHale**, [*Screening Employee Temperatures: What Employers Need to Know*](#)