Employer Best Practices: Screening for COVID-19

Issue Date: June 23rd, 2020
An illusion: The natural world is predictable and benign.

Wall Street Journal
Setting the Stage – Enabling Employers to Enhance COVID-19 Response

Understanding the unique event arc of COVID-19 and its influence on employer response

COVID-19’s Unique Event Arc

Historically, crisis events have typically unfolded with an event arc that includes identified start/stop dates, followed by a period of recovery and return to normal. However, COVID-19’s event arc is different – the arc is fluid and the disease will continue to be present until such time as a vaccine becomes available or a treatment protocol is found to be effective. In the meantime, waves of infections may be experienced in different geographies at different times and different intensities.

An employer that recognizes this fluid nature and understands how their organization’s unique footprint and business profile may be impacted can make more strategic decisions about how to manage Workforce and Business Resilience and plan for Return to Workplace strategies. Aon is the partner who has knowledge, tools and resources to help bring this nuanced insight into an Employer’s key decisions. This document is part of that broader conversation.

How Aon is helping Employers respond to COVID-19

Aon’s suggested COVID-19 Response Framework for Employers enables an organization to make decisions in an uncertain environment, flex with evolving impacts and take action with timing and priorities designed to fit each stage of the organization’s unique COVID-19 experience.

A closer look at the Pandemic Crisis Management Model for COVID-19:

Note: Model flexes with waves in the event arc and introduces timeframes for Business Impact Actions
Key Success Factors and Anticipated Challenges for COVID-19

Key Success Factors

- COVID-19 Response Framework for Clients
- Epidemiology/Public Health and Medical expertise
- Practical solutions and tools
- Strong leadership engagement
- Proper communication and education
- Having reliable support
- Comprehensive strategic planning
- Research and preparation

Anticipated Challenges for COVID-19

- COVID-19 Testing types, availability and credibility
- Disease waves across geographic sites
- Economic uncertainty globally
- Customers not ready to receive services
- Suppliers not ready to supply products or services
- Having limited access to support to help meet goals
- Being reactive vs. a proactive approach
- Employee Fear and Mental Health Considerations

This information has been provided as an informational and educational resource for Aon clients and business partners. It is intended to provide general guidance about return to work processes and is not intended to provide medical advice or address medical concerns or specific risk circumstances.
EEOC, CDC, and State Directives: Preparing to Manage COVID-19 in the Workplace

**Workplace Screenings**

- Define, communicate and implement fit for work requirements and screening protocols
- For some *essential workers*, employers may choose to modify requirements in keeping with CDC guidelines
- Develop a thoughtful process on handling and isolating employees who exhibit symptoms including; consideration of taking temperatures, separating employees who exhibit symptoms from the larger workforce population, advising the employee to seek medical advice
- Ensure this process includes protecting employee medical information

**Calling Out Sick**

- Develop a defined process for employees to follow when calling out sick
- Identify designated representatives to receive and register the call
- Provide designated representatives a questionnaire to confirm if an employee is experiencing symptoms of COVID-19
- Review your regulated Paid Sick Leave (PSL) geographies to ensure the questionnaire and administrative practices are in compliance
- Maintain the employee’s confidential information by developing a repository system. Ensure process consistency to avoid discrimination
- Provide the employee with next steps including; seeking care from a medical provider, follow up protocols and expectations of the employee

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PPE and Personal Hygiene Equipment at Non-Healthcare Workplaces

- Screenings are only one part of the safety protocols that must be built out at the workplace – employers must focus on ensuring that employees are using the appropriate Personal Protective Equipment (PPE) and Personal Hygiene Equipment

- Screeners need to be wearing appropriate PPE

<table>
<thead>
<tr>
<th>PPE and Personal Hygiene Equipment</th>
<th>Screeners</th>
<th>Cleaners/Janitors</th>
<th>Isolation Room/Area</th>
<th>Team Members/Workers (all others)</th>
</tr>
</thead>
<tbody>
<tr>
<td>N95 Masks*</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>(or Cloth Face Coverings/ Surgical Masks)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Face Shields</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Gloves**</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Gowns</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Cloth Face Coverings/ Surgical Masks</td>
<td></td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>(or N95 masks*)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Appropriate Soap and Hand Washing Station/Sanitizer</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

** Additional OSHA Regulatory Requirements - may be additional state and local regulations

* N95 masks triggers both PPE and Respiratory Protection regulations
** Gloves trigger PPE regulation

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Employer Best Practices: Screening for COVID-19 | Proprietary and Confidential | Issue Date: June 23, 2020
COVID-19 Screening Options
### Pulse Survey: Return-to-Workplace Strategies

**Question:**
Which of the following assessments or tests will your organization implement? (Respond for all that apply) (627 respondents)

<table>
<thead>
<tr>
<th>Assessment</th>
<th>Yes</th>
<th>Actively Considering</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temperature checks at work sites with thermal cameras</td>
<td>23%</td>
<td>43%</td>
<td>33%</td>
</tr>
<tr>
<td>Temperature checks at work sites by trained staff members</td>
<td>27%</td>
<td>49%</td>
<td>25%</td>
</tr>
<tr>
<td>Temperature checks at work sites on a self-reported basis</td>
<td>21%</td>
<td>51%</td>
<td>28%</td>
</tr>
<tr>
<td>Health assessment survey</td>
<td>30%</td>
<td>53%</td>
<td>17%</td>
</tr>
<tr>
<td>Provide COVID-19 antibody (immunity) testing to employees, if available</td>
<td>8%</td>
<td>58%</td>
<td>34%</td>
</tr>
<tr>
<td>Provide COVID-19 PCR (diagnostic) testing to employees, if available</td>
<td>8%</td>
<td>61%</td>
<td>31%</td>
</tr>
<tr>
<td>Request employees to attest to taking a COVID-19 antibody (immunity) test, if available</td>
<td>4%</td>
<td>49%</td>
<td>47%</td>
</tr>
<tr>
<td>Request employees to attest to taking a COVID-19 PCR (diagnostic) test, if available</td>
<td>6%</td>
<td>50%</td>
<td>44%</td>
</tr>
<tr>
<td>Other</td>
<td>13%</td>
<td>16%</td>
<td>71%</td>
</tr>
</tbody>
</table>
The Goals and Types of Screening for Return to the Workplace

**Goals:**

- Reassure employees that a thoughtful Return to Workplace plan is in place
- Reduce the potential of transmission at the workplace
- Follow the regulatory guidelines

The five screening types that employers can leverage are:

- **Employee Attestation**
- **Temperature Screenings**
- **Polymerase Chain Reaction (PCR) tests**
- **Antibody Test**
- **Antigen Testing**
- **Contact Tracing**

*According to the EEOC, Antibody tests cannot be required of employees before they are permitted to re-enter the workplace*
### Employee Attestation

- **Description**: Individual attests that they have no key symptoms associated with COVID-19, based on CDC definitions. Attestation can be done via app, written statement, and/or often as a checkpoint at entry.

- **Strengths**: Low cost for minimal effort and can be done frequently (daily). Technology can be leveraged.

- **Considerations**: Only measures symptomatic, not asymptomatic carriers or pre-symptomatic individuals (CDC estimates that more than 25% of COVID-19 cases are asymptomatic). Based on employees subjective feedback for symptoms.

### Temperature Screenings

- **Description**: Measurement of an individual’s body temperature prior to entry onsite. Multiple modalities exist, including thermal cameras at entry, personal thermometers and Bluetooth thermometers. Temperature thresholds may vary based on local guidelines.

- **Strengths**: Inexpensive way to identify symptomatic individuals. Thermal cameras and other technology allows for screening multiple people at the same time and data collection. Employees can be asked to do temperature check before coming to workplace and stay home if temperature > threshold. EEOC has confirmed that employers can measure body temperature before allowing access to the workplace.

- **Considerations**: Only a baseline qualitative measurement for illness. Only identifies symptomatic individuals. Not all symptomatic individuals have fever or may be treating fever with medication. Limitations to the accuracy of some thermometers. If in person, screeners should be wearing appropriate PPE.
## Diagnostic Testing (determines active infection)

- Diagnostic tests determine if the virus or components of the virus are present in an individual.

<table>
<thead>
<tr>
<th>Diagnostic Testing Type</th>
<th>Description</th>
<th>Strengths</th>
<th>Considerations</th>
</tr>
</thead>
</table>
| PCR                              | Uses genetic material from virus through mucous, saliva or lung tissue (swab of nose or throat) | ▪ Most are FDA approved  
▪ Most reliable diagnostic test                                                                 | ▪ Provider order required  
▪ Must be done in a CLIA certified lab  
▪ 24-72 hours to receive results  
▪ 30% false negative rate                                                             |
| rrT – PCR                        | Rapid real-time test that uses genetic material from mucous or saliva (nasal canal swab) | ▪ Runs on analysis equipment widely available in high and moderate complexity labs  
▪ < 24 hours to receive results  
▪ Can be self-administered through a nasal swab                                                                 | ▪ Select few have FDA EUA approval  
▪ Provider order required – even for at home tests  
▪ Reporting to FDA is required to validate continued reliability and efficacy  
▪ Reliability similar to PCR                                                                                                                   |
| Antigen Test                     | Rapid test through mucous, saliva, or throat swab                            | ▪ Uses similar technology currently available in doctor’s office for other rapid tests such as strep testing  
▪ Results available in just minutes  
▪ Positive results highly accurate                                                                                                             | ▪ Only one FDA EUA approved  
▪ Provider order required  
▪ Higher chance of false negatives  
▪ PCR test required as a follow up for positive or negative results, but treatment may begin for positive results |

### Diagnostic Tests

**Polymerase Chain Reaction (PCR) Tests**

**Antigen Test**

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Antibody Testing and Considerations from the EEOC

- Typically antibody testing is used to determine if an individual has mounted an immune response to a virus in the past. For COVID-19, it is not confirmed that the presence of antibodies indicates immunity.

According to the EEOC:
- Antibody tests cannot be required of employees before they are permitted to re-enter the workplace
- COVID-19 antibody tests are an impermissible medical examination under the Americans with Disabilities Act
- An antibody test at this time does not meet the ADA’s “job related and consistent with business necessity” standard for medical examinations or inquiries for current employees.

<table>
<thead>
<tr>
<th>Antibody Testing Type</th>
<th>Description</th>
<th>Strengths</th>
<th>Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Venipuncture</td>
<td>Blood test analyzed in lab (ELIZA - Enzyme-linked immunoassay) done through blood draw</td>
<td>Many have FDA or FDA EUA approval</td>
<td>Provider order required</td>
</tr>
<tr>
<td></td>
<td>Blood draw must be done by credentialed provider</td>
<td>Results available in &lt; 24 hours</td>
<td>Further evidence needed on quality of tests</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Effective way to track spread of the virus in a population</td>
<td>Does not diagnose current infection</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Likelihood and duration of immunity unknown</td>
</tr>
<tr>
<td>Fingerstick</td>
<td>Rapid test via blood droplet (finger prick)</td>
<td>Processing depends on test manufacturer and may be done in any environment</td>
<td>Further evidence needed on quality of tests</td>
</tr>
<tr>
<td></td>
<td>Processing will likely need a moderate complexity facility</td>
<td>Results available in a few minutes</td>
<td>Provider approval required</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Does not diagnose current infection</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Likelihood and duration of immunity unknown</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Select few FDA EUA approved</td>
</tr>
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Contact Tracing Overview

What is it?¹
- Traces and monitors contact of infected people and notifies of exposure
- Supports the quarantine of contacts to prevent additional transition
- States, tribes, localities and territories are establishing large cadres of contact tracers
- Adoption of digital tools may expand reach and efficacy

Impact
- If done efficiently, holds significant promise in reducing spread of the virus – in some populations can reduce infectivity by up to 85%²

Current Uses
- Traditional public health tactic used when a diagnosed individual with a communicable disease is deemed highly infectious and has high risk of morbidity and or mortality
- Employers currently support contact tracing based on public health, safety and labor regulations; typically a manual function

Opportunities and Considerations
- Digital applications are likely to improve accuracy and speed, enhancing the efforts to control spread COVID-19³, thereby contributing to economic recovery
- CDC issued guidelines to help evaluate digital contact tracing apps on May 20th¹
- Biggest challenge will be to balance protecting workforce/public health risk and personal privacy rights


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Below are the cross-functional team resources:

Nancy Buckman, RN, MSN, MBA  
VP  
Health Transformation Team  
nancy.buckman@aon.com  
617.457.7772

Sue Desai, MPH  
AVP  
Health Transformation Team  
sue.desai@aon.com  
404-264-3215

Robert ‘Neal’ Mills MD, MBA  
Chief Medical Officer  
Health Innovation Team  
Neal.mills@aon.com  
972-540-7655

Jack Maher  
Sr. Consultant  
Health Transformation Team  
jack.maher@aon.com  
312-381-3914
Sources

Center for Disease Control: Business Response:

Center for Disease Control: Symptoms of Coronavirus:

Department of Labor: FFCRA
https://www.dol.gov/agencies/whd/pandemic/ffcra-questions

Job Accommodation Network:
https://askjan.org/index.cfm

Henry Schein, Inc:

Equal Employment Opportunity Commission:
https://www.eeoc.gov/coronavirus
https://www.eeoc.gov/facts/pandemic_flu.html

Department of Labor:
https://www.dol.gov/agencies/whd/pandemic/ffcra-questions

Nature Medicine:
https://www.nature.com/articles/s41591-020-0869-5

Medical Device Network:

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