



**METROPOLITAN
WASHINGTON
AIRPORTS AUTHORITY**

**Metropolitan Washington Airports Authority
Employee Self-Screening and Temperature Measurement
Policy and Procedures for COVID-19**

August 2020

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1. Policy

The purpose of this policy, effective September 1, 2020, is to protect the safety and health of Metropolitan Washington Airports Authority (Airports Authority) employees, customers, passengers and contractors by adopting mandatory health screening and temperature screening procedures.

Employees are required to self-screen for COVID-19 symptoms prior to reporting to work and have their temperature measured at the start of their work shift each day. If an employee answers affirmatively to any of the statements on the COVID-19 self-screening tool, they are not to report to work and immediately contact their supervisor. If they have a temperature measured at 100.4°F (38°C) or higher, they must immediately leave the worksite and contact their supervisor. Employees who refuse to have their temperature measured will be sent home and may be subject to corrective action.

Contractors and visitors entering Airports Authority offices and enclosed employee work areas will be required to complete the Contractor or Visitor Self-Screening Tool for COVID-19 symptoms and exposure and have their temperature measured in accordance with this Policy. If they answer affirmatively to any statements on the COVID-19 self-screening tool, have a temperature of 100.4°F (38°C) or above, or refuse to have their temperature measured, they will not be allowed entry into enclosed employee work areas or offices.

Teleworking employees are required to comply with this Policy whenever they enter an Airports Authority facility.

1.1 Employees Who Feel Sick Must Stay Home

Employees (including temporary contractors) who are sick:

- 1.1.1 Must stay home and not report to work.
- 1.1.2 Must report their illness to their supervisor.
- 1.1.3 Contact and follow the advice of their medical provider.

2. Regulatory Overview

The federal Americans with Disabilities Act (ADA) and other federal laws protect workers from disability discrimination. Among other prohibitions, these laws restrict the employer's ability to inquire about medical conditions and limit medical examinations such as taking an employee's temperature. Certain exceptions to these restrictions apply when an employee presents a "direct threat" to the health and safety of others in the workplace.

2.1. The Equal Employment Opportunity Commission (EEOC)

EEOC, which administers the ADA, recently issued guidance on how it will apply the ADA to employer monitoring of employee temperatures as a means of protecting employees and reducing the spread of the Coronavirus.

EEOC Guidance

In a March 21, 2020, issuance that updated guidance previously issued in 2009 in response to the emergence of the H1N1 “swine flu,” the EEOC stated that the current COVID-19 pandemic is within the “direct threat” exception. Specifically, the EEOC has stated that employers may take employee temperatures to test for fevers before they enter the workplace as a means of limiting potentially infected employees’ contact with others. In addition, the EEOC stated that employers may report confirmed cases of COVID-19 to public health officials as required by applicable law.

The EEOC also noted that employees who refuse to submit to an otherwise uniformly applied temperature screening can be barred from the workplace.

2.2. The Centers for Disease Control and Prevention (CDC)

The CDC suggests asking COVID-19 screening questions and measuring the temperatures of employees when entering workplaces or facilities. It is noteworthy that people with COVID-19 can infect others before they become ill while some people with COVID-19 never become ill, but can still infect others.

3. About COVID-19

This section 3 information was sourced from CDC website April 29 and July 28, 2020.

3.1. Symptoms of COVID-19

People with COVID-19 have reported a wide range of symptoms – ranging from mild symptoms to severe illness. Symptoms may appear **2-14 days after exposure to the virus**. People with the following symptoms may have COVID-19:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Loss of taste or smell
- Muscle or body aches

This list does not include all possible symptoms. The CDC will continue to update their list as they learn more about COVID-19.

3.2. When to Seek Emergency Medical Attention

Look for **emergency warning signs** for COVID-19. If an employee is showing any of these signs, they should **seek emergency medical care immediately**:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face

This list does not include all possible symptoms. Employees should call their medical provider regarding any other symptoms that are severe or cause concern.

There is currently no vaccine to prevent the 2019 novel coronavirus (COVID-19).

4. Confidential Medical Information

HIPAA (the Health Insurance Portability and Accountability Act) is a federal law which establishes requirements for protecting the privacy and security of confidential medical information, medical records and other personally identifiable health information.

HIPAA (as well as other laws such as the Americans with Disabilities Act) requires appropriate safeguards to protect the privacy of Protected Health Information and sets limits and conditions on the use and disclosure of such information without patient authorization.

The Airports Authority policy (contained in Appendix B to the Employee Benefits Directive, HR-016) is to comply fully with HIPAA and to protect the confidentiality of Protected Health Information. All employees who have access to Protected Health Information must respect the confidentiality of such information. Therefore, the sharing of personal medical information concerning any health-related conditions such as Coronavirus testing, treatment and/or quarantine status with other MWA employees or supervisors who do not have a “need to know” is strictly prohibited.

Employee names, temperature readings, and other medical information (including information that is either documented or known by the personnel administering the temperature measurements) will be kept strictly confidential. Such information should be shared only with individuals on a need-to-know basis. In addition, the Airports Authority may share the information with public health authorities. When information is shared, only what absolutely must be shared will be disclosed.

5. Employees Must Self-Screen for COVID-19

All employees must self-screen for symptoms every day before reporting to work using the Employee Self-Screening Tool for COVID-19. If an employee answers affirmatively to the COVID-19 self-screening tool, they must not report to work and must immediately contact their supervisor. Employees who report to work are attesting that they were negative for all of the statements on the self-screening tool.

6. Measurement of Temperatures

6.1. Overview of Temperature Screening

6.1.1 All employees must have their temperature measured at the beginning of their work shift.

- a. The measurement area should have enough space around it for employees to stay 6 feet apart while awaiting temperature measurement at the start of a work shift.

6.1.2 Where feasible, a physical barrier will be provided, such as a glass window or clear plastic barrier on a table for the person responsible for taking the temperature (Screener) to stand behind

- a. Stations should be set up at least 6 feet apart from each other, and in a way that preserves the confidentiality of the person being screened so others cannot see or hear the result of the temperature measurement.

6.1.3 If a barrier cannot be put in place, the Screener must wear the following personal protective equipment (PPE): facemask, eye protection, and disposable gloves. Measuring temperatures of employees entering a facility does not replace more effective measures such as staying 6 feet apart, wearing cloth face coverings and frequently washing hands.

6.2. Mandatory Employee Procedures When Waiting to have Temperature

Measured

- 6.2.1. Employees must wear a cloth face covering.
- 6.2.2. Employees must maintain 6 feet of social distancing while waiting

6.3. Training for Screeners

- 6.3.1. Screeners will be provided with proper PPE and trained in how to use it, trained in how to properly use the temperature measurement tool, given clear testing protocols, and trained in how to follow those protocols.
- 6.3.2. Back-up personnel are to be designated and trained to ensure coverage when the primary Screener is absent.
- 6.3.3. Temperature measurement protocols will be uniformly followed when administering this temperature screening program.

6.4. Identifying Screeners

Depending on the location and operation, a manager, supervisor, group leader, or other personnel will be designated as the Screener.

6.5. Procedures for Screeners When a Physical Barrier Is Available (preferred)

- 6.5.1. When measuring temperatures, the Screener will stand behind a clear physical barrier, such as a glass window or plastic partition, to protect their face from respiratory droplets that may be produced when the employee sneezes, coughs, or talks.
- 6.5.2. When the Screener arrives at the temperature station, they should wash their hands with soap and water for 20 seconds and then put on disposable gloves. If soap and water are not available, a hand sanitizer with at least 60% alcohol should be used. If hands are visibly soiled, soap and water should be used before using alcohol-based hand sanitizer.
- 6.5.3. The Screener will take their own temperature prior to checking other employees. If the Screener's temperature tests 100.4°F (38°C) or above, they must comply with this Policy and follow the instructions for any employee testing with a temperature of 100.4°F (38°C) or higher. The Screener must be replaced by designated back-up personnel.
- 6.5.4. To measure the temperature, reach around the partition or through the window. The Screener should make sure their face stays behind

the barrier at all times.

- 6.5.5. If the temperature is below 96°F (35.6°C), the Screener will check the infrared thermometer to ensure it is working properly and take the person's temperature a second time. Back-up thermometers will be available in the event a thermometer isn't working properly.
- 6.5.6. When using a non-contact infrared thermometer, the Screener does not need to change gloves before the next check if they did not touch the person being screened.
- 6.5.7. At the end of the shift or when leaving the temperature screening location, the Screener should remove and discard gloves and wash hands as described above.

6.6. Procedures for Screeners When There Is No Physical Barrier (PPE only):

- 6.6.1. When the Screener arrives at the temperature station, they should wash their hands with soap and water for 20 seconds and then put on disposable gloves. If soap and water are not available, a hand sanitizer with at least 60% alcohol should be used. If hands are visibly soiled, soap and water should be used before using alcohol-based hand sanitizer.
- 6.6.2. The Screener will take their own temperature prior to checking other employees. If the Screener's temperature tests 100.4°F (38°C) or above, they must comply with this Policy and follow the instructions for any employee testing with a temperature of 100.4°F (38°C) or higher. The Screener must be replaced by designated back-up personnel.
- 6.6.3. The Screener will put on a facemask, eye protection (goggles or face shield that fully covers the front and sides of the face), and a single pair of disposable gloves.
 - a. The Screener will follow guidance on how to safely put on and remove PPE. The CDC recommended sequences for donning and doffing PPE is at <https://www.cdc.gov/niosh/npptl/pdfs/PPE-Sequence-508.pdf>.
 - b. Eyeglasses are not considered adequate eye protection because they do not cover the sides of the face.
- 6.6.4. Check the temperature.
- 6.6.5. If the temperature is below 96°F (35.6°C), the Screener will check the infrared thermometer to ensure it is working properly and take the person's temperature a second time. Back-up thermometers will be available in the event a thermometer isn't working properly.
- 6.6.6. When using a non-contact infrared thermometer, the Screener

does not need to change gloves before the next check if they did not touch the person being screened.

- 6.6.7. At the end of the shift or when leaving the screening location (i.e. for a lunch break), the Screener should remove and discard PPE and wash hands as described above.

6.7. Conditions That May Affect Temperature Readings

- 6.7.1. Ambient temperature, sunlight and wind can cause inaccurate readings with a forehead (temporal) or infrared thermometer when used outdoors.
- 6.7.2. Exercise within 30 minutes can cause elevated temperatures with all devices.
- 6.7.3. Medications such as aspirin, acetaminophen (Tylenol), ibuprofen (Motrin), and naproxen (Aleve) can suppress fever. Elderly employees and immunocompromised persons may not develop significant fever.

6.8. Documentation Requirements for the Screener

The Screener will:

- 6.8.1. Record only employees that have temperatures at or above 100.4°F (38°C) on the Employee Temperature Log for COVID-19. A second temperature reading should be taken to confirm the first reading. The employee must be isolated for a short period (e.g., ten minutes) while waiting for the second reading. If the second temperature measurement confirms that the reading is at or above 100.4°F (38°C), the employee must immediately leave the worksite.
- 6.8.2. Ensure all documents (e.g., Employee Temperature Log for COVID-19) are kept confidential and only personnel that need to know will have access to the information.
- 6.8.3. At the end of each work shift, employee temperature logs will be emailed to the Emergency Management and Preparedness Manager at Gregory.Vernon@mwaa.com who will maintain a centralized log.
 - a. After a copy of the log is emailed to the Emergency Management and Preparedness Manager the original log is to be shredded
 - b. This email notification and medical information should be treated as confidential.
 - c. All COVID-19 notifications or medical documentation emailed to the Emergency Management and Preparedness Manager must include “Confidential” in the email subject line. In addition, the following

statement must be included:

The information contained in this transmission may contain privileged and confidential information, including employee health information protected by federal privacy laws.

6.9. If the Employee has a Fever

- 6.9.1. An employee whose temperature is measured at or above 100.4°F (38°C) must immediately leave the worksite.
- 6.9.2. The employee will immediately inform their supervisor and contact their primary care provider. The employee must contact their manager prior to returning work for guidance.
- 6.9.3. The manager can contact the Emergency Manager Gregory Vernon or HR Representative Tanisha Lewis to determine whether or not the employee can return to work and what documentation will be required.
- 6.9.4. The manager will follow up with the employee to inform them whether or not they can return to work and what documentation they need.
- 6.9.5. The manager will follow up with the employee prior to allowing them to return to work. If they have not developed any symptoms, they can return to work after 14 days.
- 6.9.6. If the employee has developed symptoms of illness, especially fever, cough or difficulty breathing or other symptoms related to COVID-19 or other communicable diseases, they must furnish medical certification from their treating physician or practitioner to their manager prior to returning to work certifying that they have been cleared to return to work.
- 6.9.7. The manager may send the employee a letter or email, as they determine necessary, outlining these instructions. The manager must inform the Emergency Management and Preparedness Manager that an employee may be returning to work no later than the day before their return.
- 6.9.8. The employee will use their own leave or may use Emergency Paid Sick Leave if they meet one of the qualifying criteria in the Families First Coronavirus Response Act (FFCRA). [The Metropolitan Washington Airports Authority Guidance on Implementing the New Families First Coronavirus Response Act](#), dated April 15, 2020, is available on Compass.
- 6.9.9. The Telework Program provides the option for employees to work at alternative locations to maintain continuity of operations. The manager can approve the employee to telework only if the employee's job can be accomplished via telework. Employees' teleworking will abide by the terms of the Telework Policy and all other applicable Airports Authority policies, instructions, procedures, and guidelines.

7. Manager/Supervisor Notification Requirements

Manager or supervisor will immediately report employees that have called in to report that they have answered affirmatively to the COVID-19 self-screening tool or whose temperature is measured at or above 100.4°F (38°C) via email only to the Emergency Management and Preparedness Manager at Gregory.Vernon@mwa.com.

8. Reporting Employee Questions or Concerns

Employee questions or concerns can be confidentially submitted to COVID19@mwa.com.



Employee Self-Screening Tool for COVID-19 (Confidential)

To prevent the spread of COVID-19 and protect the safety and health of Airports Authority employees, customers, passengers and contractors, the Airports Authority requires all employees to perform a mandatory daily health screening using this self-screening tool prior to reporting to work.

1. In the past 24 hours, I have experienced the following new or unusual symptoms. Check all that apply.		
Symptoms	YES	NO
• Fever or Chills		
• Cough		
• Shortness of breath or difficulty breathing		
• Fatigue		
• Loss of smell and/or taste		
• Muscle Aches and Pains		
2. I have been ill with COVID-19 symptoms in the last 14 days.	YES	NO
3. I am currently observing a quarantine order due to potential exposure to COVID-19.	YES	NO
Due to widespread COVID-19 infections, report travel below to your supervisor before you report to an Airports Authority worksite:		
4. I have traveled to a known international or domestic COVID-19 “Hot Spot” in the last 14 days.	YES	NO
5. I have traveled on a cruise ship in the last 14 days.	YES	NO

If you answered YES to any of the above statements, you are not to report to work and do the following:

- Notify your manager immediately.
- Comply with all instructions provided by your manager and the Emergency Management and Preparedness Manager and all COVID-19 Policies and Procedures.

Employees who report to work are attesting that they were negative for all of the statements on this screening tool.

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Contractor or Visitor Self-Screening Tool for COVID-19 (Confidential)

To prevent the spread of COVID-19 and protect the safety and health of Airports Authority employees, customers, passengers and contractors, the Airports Authority requires all contractors and visitors to perform a mandatory daily health screening using this self-screening tool prior to entering into enclosed Airports Authority employee work areas or offices.

1. In the past 24 hours, I have experienced the following new or unusual symptoms. Check all that apply.		
Symptoms	YES	NO
• Fever or Chills		
• Cough		
• Shortness of breath or difficulty breathing		
• Fatigue		
• Loss of smell and/or taste		
• Muscle Aches and Pains		
2. I have been ill with COVID-19 symptoms in the last 14 days.	YES	NO
3. I am currently observing a quarantine order due to potential exposure to COVID-19.	YES	NO
4. I have traveled to a known international or domestic COVID-19 "Hot Spot" in the last 14 days.	YES	NO
5. I have traveled on a cruise ship in the last 14 days.	YES	NO

If you answered YES to any of the above statements, you will not be allowed to enter into enclosed Airports Authority employee work areas or offices.

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Metropolitan Washington Airports Authority Employee Temperature Log for COVID-19 (Confidential)

Only personnel with a need to know can have access to this information.

1. All employees are required to have their temperature measured at the beginning of their work shift.
2. The screener will document only employee temperatures at or above 100.4°F (38°C) using this form.
3. Employee with a temperature of 100.4°F (38°C) degrees or higher must be sent home.
4. Email this log with recorded temperatures to Gregory.Vernon@mwa.com at end of work shift each day.

Screener Initials	Date	Time	Employee Last, First Name	Temperature	Second Temperature	Employee sent home	Notes/Other Symptoms
						<input type="checkbox"/> NO <input type="checkbox"/> YES	
						<input type="checkbox"/> NO <input type="checkbox"/> YES	
						<input type="checkbox"/> NO <input type="checkbox"/> YES	
						<input type="checkbox"/> NO <input type="checkbox"/> YES	
						<input type="checkbox"/> NO <input type="checkbox"/> YES	
						<input type="checkbox"/> NO <input type="checkbox"/> YES	
						<input type="checkbox"/> NO <input type="checkbox"/> YES	

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