Healthy at Work Testing Plan Guidance

**Healthy at Work Minimum Requirements** require entities (including employers) to have a “testing plan” in place prior to re-opening. This document gives additional guidance to employers on how to go about developing a testing plan.

The primary role of a testing plan in the workplace is to quickly determine whether employees showing symptoms are COVID-19 positive so that appropriate measures are taken to provide care to the individual and to prevent further spread in the workplace and community. There is no-one-size-fits-all testing plan, however, all supervisors and employees should have a basic understanding of when they should not report to work, based on symptoms or exposure, and where they can be tested. Currently, widespread testing of employees is not recommended.

It is important to emphasize that testing is only one tool to help identify who may be infected. Employers should also encourage other **Healthy at Work measures** to prevent disease spread such as social distancing, appropriate mask use, temperature and symptom assessments, hand-washing, and proper disinfection practices.

Testing plans should address the following components:

1. **Identify and test employees who are symptomatic.**
   - All employers should have a protocol in place to conduct daily temperature and COVID-19 symptom checks, isolate those who are symptomatic, and refer them to testing.
   - Employees who have symptoms should be instructed to stay home. The [Emergency Paid Sick Leave Act](https://www.hhs.gov/whistleblower/emp.html) and [Emergency Family and Medical Leave Expansion Act](https://www.epa.gov/energy/emergency-paid-sick-leave-act-emergency-family-and-medical-leave-expansion), both part of the Families First Coronavirus Response Act (FFCRA) offer support for businesses to expand paid leave.

2. **Identify close contacts of cases in your workplace and encourage them to quarantine and get tested.**
   - Employers should have the ability to track dates, times, and locations where their employees have been working.
   - Health departments or [vendors they have contracted](https://www.hhs.gov/whistleblower/emp.html) will be contacting people whom the employee identifies as close contacts and may also contact employers to assist with identifying anyone at risk of developing COVID-19. This is a process known as contact tracing. More information on this process and who may be considered a close contact can be found [here](https://www.hhs.gov/whistleblower/emp.html).
   - Employees who were close contacts to a case should remain on self-quarantine for 14 days following the most recent exposure. They should monitor for symptoms of COVID-19, which can occur at any time during that 14-day period.
   - Close contacts can get tested for COVID-19, even if they are asymptomatic. However, after initial exposure, it sometimes takes a few days before the virus can be detected. A negative
test collected too soon may not mean that a person will not become symptomatic or test positive a few days later.

3. Ensure employees are tested using accurate and appropriate tests.
   - Employers are encouraged to share resources where an employee can get tested.
     - Employees can contact their primary care provider for testing.
     - A list of testing locations in Kentucky can be found here: https://govstatus.egov.com/kycovid19
     - Employers should ensure that tests used are approved under Emergency Use Authorization (EUA) from the Food and Drug Administration (FDA).
   - Only diagnostic tests can determine whether someone has a current infection. Consult with guidance from the FDA on which molecular diagnostic tests are currently approved.
   - Other tests that can be done include antibody, or serology, tests (which may indicate that there is an immune response to exposure to the virus) or antigen tests (which detect specific proteins from the virus). These tests have additional limitations and DO NOT indicate whether someone is currently infected. They should not be used alone to exclude an employee from work. Additional considerations for exclusion from work will be taken into consideration by a case investigator.

Testing to determine return to work
   - It is not recommended at this time that employers require negative COVID-19 tests prior to permitting previously positive employees’ return to work. There are documented instances where people continue to test positive long after their symptoms have ceased; experts have determined they are not likely to still be infectious.
   - Instead, employers should refer to the symptom-based return to work guidance published by KDPH for any employees who have tested positive. Guidance on this process and documentation for your employee will be provided by your local health department or their healthcare provider.

Widespread testing of employees
   - It is not recommended at this time to conduct widespread testing of asymptomatic employees as a way to “screen” employees before the workplace reopens. In certain high-risk work environments (such as congregate living facilities, prisons, and other specific situations), it may be appropriate to conduct widespread testing of employees. Your local health department can help determine if this is needed.
   - If multiple cases (two or more) are identified within your workplace, your local health department or KDPH can help determine an appropriate testing strategy that would include symptomatic and asymptomatic employees. Employers may also decide to proactively partner with a lab or healthcare provider to provide testing using valid and approved tests. Any testing should offer the option for healthcare provider evaluation for employees who desire follow-up about their results and any further instructions.