

## **New CDC Guidance on Testing Employees for COVID-19**

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On July 3, 2020, the Center for Disease Control and Prevention (CDC) issued the attached new Guidance entitled “SARS-CoV-2 Testing Strategy: Considerations for Non-Healthcare Workplaces”. This new guidance recommends incorporating COVID-19 testing in 5 different scenarios:

1. Testing individuals with COVID-19 related symptoms;
2. Testing asymptomatic individuals with recent known or suspected exposure in order to control transmission;
3. Testing asymptomatic individuals without a recent known or suspected exposure for early identification in special settings;
4. Testing to determine when an individual may discontinue home isolation; and
5. Testing for public health surveillance.

According to the CDC document, testing is most appropriate in those areas where there may be moderate to substantial community transmission of COVID-19 and at workplaces where employees are in close contact with each other or the public. Of course, the June 3, 2020, CDC guidance does not override State or local public health provisions or directions from the Federal EEOC that issued from time to time.

Four of the five proposed testing scenarios that are appropriate to the agricultural industry are as follows:

- Testing individuals with signs or symptoms consistent with COVID-19: by way of example, if there is an employee who is found to have a fever exceeding 100.4 degrees during a daily temperature check at work the employee should immediately be isolated from others, sent home or to a healthcare facility and be immediately tested for the Coronavirus. Any employee who might have been infected by that person should also be sent home to quarantine pending the test results.
- Testing asymptomatic individuals with recent known or suspected exposure: If an employee has been exposed to a confirmed COVID-19 case, he or she should be quarantined immediately and tested for the virus. Testing should be done several days after exposure because the virus might not be detected immediately according to the CDC document. The suspected employee should remain quarantined at least until test results are received.
- Testing asymptomatic individuals without known of suspected exposure: Testing all employees each shift or at regular interval. A “mass testing” approach might be appropriate in areas where there is high transmission and workers are in close contact with each other. These can include workplaces where physical distancing

is difficult and workers are in close contact (within 6 feet for fifteen minutes or more) with co-workers or the public; in places in remote settings where medical evaluation or treatment may be delayed; workplaces where continuity of operations is high priority (e.g., critical infrastructure job sectors); and workplaces providing congregate housing for employees, e.g., farmworker housing or camps.

Suggested approaches may include initial testing of all workers before entering a workplace, periodic testing of workers at regular intervals, and/or targeted testing of new workers or those workers returning from a prolonged absence.

CDC recommends that before testing a large proportion of asymptomatic workers without known or suspected exposure, employers are encouraged to have a plan in place for how they will modify operations based on test results and manage a higher risk of false positive results in a low prevalence population.