



Testing Guidelines for Non-Government Employers (Created 09/16/2021)

Purpose: *To provide employers in Delaware with testing guidelines to screen unvaccinated employees for COVID-19. Guidelines are subject to change.*

Background: *Unvaccinated employees are more likely to contract and transmit COVID-19. Testing unvaccinated employees on regular intervals allows for early identification of virus transmission by identifying pre-symptomatic and asymptomatic cases. Testing can help employers determine when to take necessary health precautions to minimize viral spread among employees. In some cases, these screening tests may be required by state or federal mandates.*

This document will help you:

- I. Determine type of testing and frequency for your organization
- II. Select a location for testing
- III. Become familiar with potential testing vendors or manufacturers to engage
- IV. Understand program oversight considerations to implement
- V. Learn how common programs operate
- VI. Communicate information to employees
- VII. Review the key elements needed for a testing program

I. Determine type of testing and frequency for your program

- There are two types of viral tests for SARS-CoV-2, the virus that causes COVID-19. They include nucleic acid amplification tests (commonly known as PCR) and antigen tests (More information about these can be found on the [CDC's website](#).
 - **PCR**¹: Tests that amplify the genetic material to detect the presence of the virus that causes COVID-19.
 - **Rapid antigen**: Tests that detect the presence of protein markers from the virus to determine the presence of SARS-CoV-2
- ¹Note, PCR is the most common type of nucleic acid amplification test (NAAT), but there are other types of NAAT tests such as CRISPR or LAMP that may be included in this category.
- An employer may choose to accept either or both PCR and Antigen tests. The [CDC outlines considerations, pros, and cons of each test type](#).



[Considerations, Pros, and Cons for PCR and Antigen Test](#)

	PCR	Antigen
Intended Use	Detect <i>current</i> infection	Detect <i>current</i> infection
Sensitivity	Varies by test, but generally high for laboratory-based tests and moderate-to-high for point-of-care (POC) tests analyzed outside of a lab	Varies depending on the course of infection, but generally moderate-to-high at times of peak viral load
Test Complexity	Varies by test	Relatively easy to use
Authorized for Use at the Point-of-Care (e.g., without a lab)	Most are not, some are	Most are, some are not
Turnaround Time	1-3 days for most (Some tests could be within 15 minutes)	Ranges from 15 minutes to 30 minutes
Cost/Test	Moderate (~\$75-\$100/test)	Low (~\$5-\$50/test)
Advantages	<p>Most sensitive test method available</p> <p>Short turnaround time for similar POC tests, but few available</p> <p>Usually does not need to be repeated to confirm results</p>	<p>Short turnaround time (approximately 15 minutes)</p> <p>When performed at or near POC, allows for rapid identification of infected people, thus preventing further virus transmission in the community, workplace, etc.</p> <p>Comparable performance to PCR in symptomatic persons and/or if culturable virus present, when the person is presumed to be infectious</p>
Disadvantages	<p>Longer turnaround time for lab-based tests (1-3 days)</p> <p>Higher cost per test</p>	<p>May need confirmatory testing</p> <p>Less sensitive (more false negative results) compared to PCR, especially among asymptomatic people</p>
Common Use	Diagnosing positive COVID cases	Screening employees at work or school



- Viral tests should be used as part of [routine testing for unvaccinated employees](#).
 - Routine testing of unvaccinated staff should be based on the level of the viral spread in the community. Reports outlining community transmission levels are available on the [CDC COVID-19 Integrated County View site](#).
 - Note: Any employee who is experiencing symptoms of COVID-19 should stay home and not come to work to get tested. The employee should immediately isolate and [seek guidance from a medical professional](#).

- Recommended frequency of testing for unvaccinated employees¹
 - CDC recommends conducting [screening testing at least weekly](#). Employers may find the following factors helpful to consider when determining the interval for periodic testing:
 - The availability of testing, turnaround time, and cost
 - The time period between exposure and development of a positive SARS-CoV-2 viral test
 - [Type of workplaces](#)
 - [Level of community transmission](#) (low, moderate, substantial, or high)
 - How many employees tested positive during previous rounds of testing
 - Relevant experience with outbreaks at the workplace

¹ Employers subject to state or federal mandates may be required to test employees on a regular basis, even during period of low community transmission. These employers include: Long-Term Care Facilities, Acute and Outpatient Providers, and Employers with 100+ Employees. More details are available at <https://news.delaware.gov/2021/08/12/covid-19-vaccination-and-testing-updates-for-long-term-care-facilities-health-care-facilities-and-state-employees/> and <https://www.whitehouse.gov/covidplan/#testing-masking>.



II. Select a location for testing

- For routine testing, non-government employers can provide off-site and on-site testing options for employees

Options	Location	Approach	Considerations
<u>On-Site</u>	Site of employment	Employer has reoccurring times for employees to get tested at their employment site	Contracting with a vendor should include designated space for testing that is sanitized, private, and has strong airflow (e.g., windows, ventilations)
<u>Off-Site</u>	Home	Employee collects sample at home (nasal or saliva) and results are processed at home (rapid antigen) or sent to a lab for processing	It is the employer's role to create a testing plan that encourages compliance from each employee. The leading practice is for at-home tests to be initialed with date and time before a test image is collected.
	Another location	Vendor collects employee sample at their designated testing site and processes the test there or sends to a lab for processing	Site should be easily accessible for employees



- Some pros and cons of these testing options are outlined below

Options	Location	Pros	Cons
<u>On-Site</u>	Site of employment	<ul style="list-style-type: none"> • Results interpreted by a professional are less likely to be incorrect • Convenient for the employee • Limited time off required for testing 	<ul style="list-style-type: none"> • Program costs may be higher than other options • Employees may have to wait for a clinical professional, depending on when the health care professional performing testing is scheduled to arrive • Requires dedicated space • If an employee is positive, they may have been in contact with others at the workplace the same day of testing
<u>Off-Site</u>	Home	<ul style="list-style-type: none"> • Program costs may be lower with at-home options • Convenient for the employee 	<ul style="list-style-type: none"> • Results may be incorrectly interpreted • At-home test types may be less reliable than other test types
	Another location	<ul style="list-style-type: none"> • Results interpreted by a professional are less likely to be incorrect • Program costs may be lower than on-site option • May be able to leverage existing relationships with occupational health or other providers 	<ul style="list-style-type: none"> • Off-site locations may be inconvenient for employees



- Additional considerations
 - CLIA waivers – certain on-site tests require the vendor to have a CLIA certificate of waivers (i.e., testing not performed at home; [Find more information on the CDC website](#))

III. Become familiar with potential testing vendors or manufacturers to engage

- Here is a list of potential vendors that can offer testing options:

Options	Location	Entity	Information / Contact
<u>On-Site</u>	Site of employment	LabCorp	www.labcorp.com/coronavirus-disease-covid-19/organizations
		CVS	www.cvshealth.com/covid-19/return-ready/workplaces
<u>Off-Site</u>	Home	Pixel (LabCorp)	www.pixel.labcorp.com/small-business
		Quidel	www.quickvueathome.com
		Lets Get Checked	www.letsgetchecked.com/corporate-coronavirus-testing/
		Phosporous Diagnostics	www.phosphorus.com/covid-19-enterprise-testing-solutions
		P23	www.p23labs.com/usa-covid19-order-form
		Fulgent	www.fulgentgenetics.com/covid19/enterprise
		Everywell	www.everlyhealthsolutions.com/employers
		CVS	www.cvshealth.com/covid-19/return-ready/workplaces



	Another location	LabCorp	www.labcorp.com/coronavirus-disease-covid-19/organizations
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- Additional testing provider resources:
 - DE Testing Resource List - <https://coronavirus.delaware.gov/testing-resource-list/>
 - DE Testing Site List - <https://coronavirus.delaware.gov/testing/>

IV. Understand program oversight considerations to implement

- **Information tracking** – the employer should have a process to collect test results, either from a third-party provider or images of at-home tests performed by the employee on a regular basis
 - *On-site Example:* On-site vendor provides a roster of employees with their compliance status and most recent test results
 - *At-home Example:* Employees use a secure online survey to log results with a signed and dated image of their test
- **Enforcement** – the employer should have policies in place to enforce testing requirements for employees
 - *Example:* Company suspends employees not completing regular testing or providing falsified results
- **Positive case protocols** – the testing program should be designed with a process to isolate an employee who tests positive
 - An employee who tests positive should only return to work when they meet the CDC’s [return-to-work criteria](#) or have been cleared by a healthcare professional
 - Employers should develop a contact tracing policy to ensure close contacts (any individual within 6 feet of an infected person for a total of 15 minutes or more) of persons who test positive are identified and [given proper guidance](#).
 - Anyone in close contact with the employee should be notified and provided with appropriate quarantine procedures.
 - Employers must never name an individual who tested positive for COVID-19.
 - The spaces at work facility occupied by an employee with a suspected or confirmed case of COVID-19 should be cleaned and sanitized. The sanitization should be [consistent with CDC guidelines](#).
 - *At-home Example:* Consistent with CDC guidelines, [an employee who tests positive at home should be provided instruction to remain home](#), information on isolation and follow-up medical care, and details on confirmatory testing. Anyone in contact with the employee should be notified and provided with appropriate quarantine procedures.
 - *On-site Example:* An employee who tests positive should immediately be isolated from their peers, sent home, and provided information on isolation and follow-up medical care and confirmatory testing. Anyone in contact with the employee should be notified



and provided with appropriate quarantine procedures. Anywhere the employee was physically located should be sanitized consistent with CDC guidelines.

- **Outbreak management** – the employer should have a plan to contact the Division of Public Health (DPH) for support in the event of an outbreak (two or more employees who test positive and are discovered to have a linkage such as working in the same location).
 - *Example:* Two employees who were in close contact with each other both test positive. The company notifies DPH via Sheila Nunez (sheila.nunez@delaware.gov) and Staci Blum (staci.blum@delaware.gov).

V. Learn how common programs operate

- **Example process: On-site antigen with vendor**
 - Unvaccinated employees with symptoms or known COVID exposure will not come to work
 - Asymptomatic employees who have not had a known COVID exposure will come to work as usual
 - Unvaccinated employees will be provided with a recurring testing appointment
 - An employee with a testing appointment will report to the designated location at the work site where a testing vendor or other healthcare professional is collecting tests
 - On-site test location selected based on close proximity to exit, low foot traffic, privacy, and air flow
 - An employee will have their test sample collected by a vendor with appropriate PPE
 - The employee will wait up to 15 minutes for results to be made available
 - If the employee tests negative, the employee resumes their typical work responsibilities
 - If the employee tests positive, the employee should immediately be isolated from other staff, sent home in a way that protects their privacy, and provided information on isolation and follow-up medical care and confirmatory testing. Close contacts of the employee should be notified and provided with appropriate quarantine procedures.
- **Example process: At-home antigen**
 - Unvaccinated employees with symptoms or known COVID exposure should contact a medical professional for guidance around diagnostic testing. They should not come to work.
 - Asymptomatic employees who have not had a known COVID exposure will complete an at-home screening test on a regular basis
 - Unvaccinated employees will be provided with a supply of at-home antigen tests
 - The employee will complete the at-home test
 - If the employee tests negative, the employee shares the signed and dated image of their test result with their company, resumes their typical work responsibilities, comes into work



- If the employee tests positive, the employee should not come into work. The employee should share the results of their test and immediately notify the company. The employee should be provided information on isolation and follow-up medical care and confirmatory testing. Anyone in contact with the employee should be notified and provided with appropriate quarantine procedures.

VI. Communicate information to employees

- Clear communication is essential to the success of a screening testing program
 - As strategies change (e.g., change in frequency of testing in response to change in community transmission) updated communication should be provided
 - As needed, submission reminder emails should be provided to employees
 - Depending on the organization, it may be beneficial to provide translations or diagrams
- Communication to employees should address several key elements
 - Location and frequency of testing
 - Program enrollment process (if applicable)
 - Program requirements including results submission process (if applicable)
 - Instructions for both symptomatic employees and those who test positive
 - Who to contact with questions
- Example communication to an employee
 - In line with current guidelines from the Delaware Division of Public Health, our company is implementing a screening program to test unvaccinated employees for COVID-19. This screening program is designed to be simple, and testing is safe and pain free.
 - You will receive a separate email from our vendor with information about enrolling in the program. By enrolling in the program, you consent to your test results being shared with our HR department. Your health data will be kept confidential.
 - Testing will be completed at our work site by our vendor. At this time, you will be required to be tested once per week. Should that change, we will let you know as soon as possible. *Please note, if you feel sick, you should stay home from work, inform your supervisor, and contact a health care professional immediately for guidance. If you feel sick, you cannot participate in the screening testing program.*
 - If you receive a positive test result, you will be instructed to return home and isolate immediately. Further guidance will be provided at that time.
 - As long as you remain unvaccinated or choose not to disclose your vaccination status, testing will be required. If you decide to get vaccinated and share your status, you will be able to disenroll from the program.
 - You are encouraged to reach out to our department with any questions or requests for clarification.



VII. Review the key elements needed for a testing program

- Testing, safety, and sanitization supplies
 - Determine testing location, test type, vendor (if applicable), and frequency of testing
 - Sufficient tests on hand for regular testing requirements and potential surge testing
 - Sanitation supplies for routine disinfection (e.g., hand sanitizer, surface disinfectants, paper towels, disinfectant wipes)
 - PPE (e.g., gloves, gowns, masks, face shields) inventory based on number of employees involved in the testing process
- Training and communications
 - Those administering tests have received practical training on how to conduct tests
 - Employees have all been notified of the screening program
- Site logistics
 - Schedule tests for relevant employees
 - As applicable, select on-site test location based on close proximity to exit, low foot traffic, privacy, and air flow
 - Set up room / area for testing
 - Prepare sanitation procedures in the event of a suspected or confirmed case
 - Employees have signed consent forms
 - Labor unions (e.g., nurses union) have been notified and are aligned with program
 - CLIA certificate of waiver (if necessary) has been approved
- Oversight process
 - Establish clear internal process and procedures for positive test results
 - Deploy result management / privacy processes

Additional Information

More context is available through these helpful resources:

The Rockefeller Foundation. Three Steps to Smart Covid-19 Testing A Guide for Employers - <https://www.rockefellerfoundation.org/wp-content/uploads/2021/05/Three-Steps-to-Smart-Covid-19-Testing-A-Guide-for-Employers-Small-Business-Protocol.pdf>

CDC. Overview of Testing for SARS-CoV-2 (COVID-19) - <https://www.cdc.gov/coronavirus/2019-ncov/hcp/testing-overview.html>