COVID-19 Testing
Employer Resource Guide

Diagnostic testing is an important public health response to any infectious disease outbreak. As businesses begin to reopen, employers are tasked with implementing a variety of state and federal protocols designed to protect employees and communities. One element of these protocols includes the development of a testing plan. Here, employers will find key considerations and recommendations for implementing an evidence-based and effective diagnostic testing plan for their workplace, including:

- **Types of SARS-CoV-2 Tests**
- **Guidance for Employer Testing**
- **Considerations for Choosing a Testing Partner**

Key Questions for Employers to Ask when Developing a COVID-19 Testing Plan

- What type of COVID-19 testing, if any, do I need to offer my employees?
- Do I need to establish a contract with a testing vendor or do my established health partners already offer testing?
- Does the testing technology being used have an Emergency Use Authorization (EUA)?
- Is the laboratory processing the COVID-19 tests certified by the Clinical Laboratory Improvement Amendments (CLIA)?
- Does the testing administrator have follow up and care coordination procedures in place?
- How does testing fit into my entire COVID-19 workplace plan?

Types of SARS-CoV-2 Tests

SARS-CoV-2 is the name of the virus that causes the COVID-19 disease. When it comes to COVID-19 tests, there are two variations: diagnostic and antibody. For more details on the specifics of different types of COVID-19 tests within these categories, see Figure 1.

Diagnostic Tests

Diagnostic tests detect whether someone currently has COVID-19. There are two types of COVID-19 diagnostic tests: (1) molecular tests that identify the virus's genetic materials, and (2) antigen tests that detect specific proteins on the surface of the virus.

Antibody Tests

Using a blood sample, this test detects whether someone has antibodies for COVID-19 in their system. The presence of these antibodies may mean that someone has previously been infected with COVID-19. They are typically detectable one to three weeks after infection. This test does not confirm whether someone currently has COVID-19, and may not accurately confirm prior infection with SARS-CoV2. Current guidelines from the Centers for Disease Control and Prevention (CDC) state that more data on the reliability of these tests is needed before public health recommendations such as

Figure 1.0: Types of Coronavirus Testing

	Molecular Testing	Antigen Testing	Antibody Testing
Also known as…	Diagnostic test, viral test, molecular test, nucleic acid amplification test (NAAT), RT-PCR Tests	Rapid diagnostic test	Serological test, serology, blood test, serology test
How is the sample taken?	Most tests are taken by nasal or throat swabs, but there are a few taken with saliva	Tests are taken by nasal or throat swab	Tests are taken by blood draw or finger stick
How long does it take to get test results?	Time is variable, with results being returned same day to up to a week	Test results take one hour or less	Some test results can be returned same day, while others take 1-3 days
How accurate is the test?	Positive results are generally reliable, however can potentially be skewed by improper or untimely administration	Positive results are usually accurate, but negative results should be confirmed with a molecular test	IgG is most frequently used marker of past infection
What does it show?	Whether or not someone has an active COVID-19 infection	Whether or not someone has an active COVID-19 infection	If someone has been infected with coronavirus in the past
What can't it do?	Show if someone has ever had COVID-19 in the past	Definitely rule out COVID-19 infection. Antigen tests are less reliable compared to molecular tests	Diagnose an active COVID-19 infection or show that someone does not have COVID-19

[1]https://www.fda.gov/consumers/consumer-updates/coronavirus-testing-basics

social distancing and the use of personal protective equipment (PPE) are modified based on their results.

Guidance for Employer Testing

Employer COVID-19 testing should be a part of an employer's larger COVID-19 workplace plan. For full guidelines and protocols, visit Healthy at Work for Kentucky and Back on Track Industry for Indiana. In this document, employers will find general guidance specifically for their state's diagnostic testing plan. Approaches to testing can vary based on a number of characteristics. Industry, population size, demographics, risk factors, and job duties are all things to consider. Employers should consult with legal counsel when developing this plan.

Workplace Regulations

The COVID-19 pandemic has spurred many regulatory shifts for employers and shown a need for clarification on how regulations apply to this unique situation. The Americans with Disabilities Act (ADA), Rehabilitation Act, and other Equal Employment Opportunity (EEO) laws are all relevant. For more information, employers should visit https://www.eeoc.gov/coronavirus.

Disability-related Inquiries and Medical Examinations
The ADA permits employers to ask questions about COVID-19 related symptoms, as well as take employee temperatures in order to identify individuals who may be at risk of COVID-19. Current interpretation of ADA laws allow for mandatory COVID-19 testing. Guidance states that "...employers may take steps to determine if employees entering the workplace have COVID-19 because an individual with the virus will pose a direct threat to the health of others. Therefore an employer may choose to administer COVID-19 testing to employees before they enter the workplace to determine if they have the virus." Employers may also consider requiring fitness-for-duty documentation for returning to work following a diagnosis of COVID-19.

Medical Information
Per ADA guidelines, all employee health information must be kept in a medical record separate from a personnel file. All documentation of inquiries and examinations related to COVID-19 must be kept in this medical file.

Hiring and Onboarding
Employers should determine how they will handle COVID-19 testing for new hires for conditional and post-employment offers.

Reasonable Accommodation
Employees with an underlying condition that puts them in a high risk category for COVID-19 may be entitled to reasonable accommodations in the workplace to mitigate their risk of contracting the virus. Employers should consult the Job Accommodation Network (JAN) for more information on accommodating COVID-19 risks.

Testing Plan Logistics
When implementing an on-site testing program or an off-site testing plan, there are several logistical items that employers may need to consider. Testing should be a part of a larger workplace COVID-19 plan.

Location
COVID-19 testing can be administered in a variety of settings. Employers may choose to implement testing on-site, or send employees to drive-thru testing sites, primary care offices, or specialty clinics. Employers should consider which of these options is the best fit for their workforce.

Timing
COVID-19 symptoms typically appear between two to 14 days after exposure. The reliability of testing technologies vary during this time period, creating the potential for receiving a false negative. It is important to remember that a COVID-19 test indicates whether or not a person has the virus at a single moment in time. Refer to state and CDC guidelines to learn how quickly employees should receive a COVID-19 test after displaying symptoms.

Population
When coordinating testing, employers may choose to administer testing to their entire population. Alternatively, employers may choose to only test those showing symptoms. When making this determination, employers should consider the nature of their industry and jobs being performed.

Optional or Mandatory
Employers should consider whether mandatory testing is a business necessity for their workplace. Additionally, employers should have a plan in place for employees who elect to not receive testing.

Consulting with legal counsel is recommended for the development of all elements employer COVID-19 testing plans.

Considerations for Choosing a Testing Partner
When deciding which COVID-19 testing supplier to partner with, employers have many considerations to ensure that their employees and workplaces are being kept safe, healthy, and operational. Employers should evaluate both the testing technology being used and the lab processing the test. The Food and Drug Administration (FDA) provides explicit guidance around testing standards.

Authorizations
The FDA reviews and approves medical products, including diagnostic and antibody tests, before they can be useful for the public. In public health emergencies, such as the COVID-19 pandemic, the availability of medical products is urgent. To meet this urgent need, the FDA has expedited and expanded access to testing by providing Emergency Use Authorizations (EUAs) to COVID-19 test manufacturers. All testing technologies should have an EUA at their time of administration. It is possible for a test technology to have its EUA retracted for concerns around accuracy.

In addition to testing technologies, the laboratory processing test should be certified by the Clinical Laboratory Improvement Amendments (CLIA). The

CLIA certification is in place to ensure quality laboratory testing.

Test Reliability

Test reliability refers to how dependable and accurate a test measures results. When it comes to COVID-19 testing, there is wide variability in testing reliability. When evaluating testing reliability, sensitivity and specificity should be considered. Test sensitivity is the ability of a test to correctly identify those with the disease, or the true positive rate. Test specificity is the ability of a test to correctly identify those without the disease, or the true negative rate. The overall incidence of COVID-19 in the population is low, which increases the opportunity for false positives in testing. The gold standard for COVID-19 diagnostic testing is a nasopharyngeal swab. Other swab types (e.g., nasal, oral) become increasingly less sensitive and reliable. For antibody testing, current research has indicated that use may yield up to a 50% false positive rate. This reinforces the CDC statements that more evidence is needed before using results from antibody tests to make any public health decisions.

Care Coordination

Following a positive result on a COVID-19 diagnostic test, subsequent care coordination and monitoring is important in improving health outcomes. A testing setting that either facilitates care coordination or is part of a health system can help individuals receive timely care and connect them with necessary resources. Doing so can facilitate a quicker recovery, reduced community spread of the virus, and help employers facilitate a medically informed return to work process.

Additional COVID-19 Resources for Employers

For questions, comments, or additional guidance, contact Natalie Middaugh, KHC Community Health Program Manager, at nmidaugh@khcollaborative.org

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