**COVID-19 Testing Policy**

This policy is appropriate for NC employers; state and municipal laws may vary.

COMPANY NAME has an obligation to its employees to foster a safe and secure workplace. In accordance with our responsibilities and values, COMPANY NAME is implementing a COVID-19 testing policy to quickly identify COVID-19 cases and ensure they take extra safety precautions/isolate if necessary, and to ensure accurate COVID-19 contact tracking.

Certain employees (vaccinated, working from home, those with an ADA/religious accommodation approved for testing) may not be required to comply with this policy in full as long as they comply with the request/proof process outlined below.

**Process**

Beginning DATE, all employees not otherwise exempted are required to submit to [*bi-weekly]* COVID testing. Affected employees must test *[detail: Sunday and Wednesday after their workday].*

*NOTE: [Spell out how testing will be conducted– through a provider of their choosing or an onsite clinic?*

*In general, testing does not require solicitation of medical information as a vaccination or other exam might,*

*As an employer, your options to provide to staff are as follows:*

*Onsite/offsite mandated medical clinic: If you have an onsite clinic, and your clinic complies with the medical guidance on selecting and administering the test, as well as providing appropriate disclaimer/consent notices, you should ensure that employees sign a release form permitting the clinic to provide you with immediate notification of a positive or negative result. Clinics should be notified that since they are partnering with you, ADA privacy requirements are in place and they are not to share any information with you other than the test result. In addition, it is your responsibility to ensure that if onsite, employees are able to provide medical information to the tester (if necessary) without other employees overhearing or seeing that information.*

*Employee’s own selected medical provider: This may make it difficult for you to get test results quickly/honestly which may compromise safety. In this case, you should require the employee to either provide a form to return to you or other proof of the negative test. The employee should have to provide negative proof immediately upon return to work, generally to the HR staff.*

*Self-test at home or at work: We advise against this method as you would need to ensure accuracy of test and administration, as well as comply with other notification/consent requirements related to the testing process. In addition, maintaining accurate proof may be difficult.*

**Results Notification**

Test results must be submitted to the Human Resources Department upon arrival at the facility (negative) or by phone within an hour of results (positive)

* If your COVID test results are negative, and you successfully pass any other relevant pre-screening measures, you may generally report to work as normal.
* If your COVID test results are positive, DO NOT report to work or enter any COMPANY NAME facility or job site. Contact the Human Resources Department for further instructions. If HR is not readily available, you must contact your supervisor and have them assist you with getting in touch with HR. It is important to speak directly with an individual and not rely on email or text in this case. However, if you are unable to reach someone, leave a voicemail with both the supervisor and the HR Department.

**Timekeeping & Recordkeeping**

Non-exempt employees must accurately record all time spent traveling to and receiving testing. This time should be entered in the same manner all other work time is captured.

COVID testing should be free. However, if you incur a cost associated with receiving a COVID test, you must keep any relevant documentation and contact the Human Resources Department to determine if reimbursement is appropriate.

**ADA and Religious Accommodation**

Individuals with religious objections to getting a medical test such as that for COVID-19 or those who cannot be tested for medical reasons may contact the Human Resources Department by [DUE DATE] to discuss a reasonable accommodation.

Vaccination status and testing results are confidential medical information. In accordance with the ADA, any medical records for an employee will be kept in a confidential file. All such information will be maintained in compliance with all applicable legal requirements.

**Other Exceptions (Vaccinated/Work from Home)**

Employees who are vaccinated may choose to opt out of testing, since the transmission rate for COVID-19 is lower for them than the unvaccinated population. Employees must provide proof of vaccination if they wish to opt out of testing. This proof must be provided (for the first round of testing) by DUE DATE. [*Spell out the process – Do they send an email, upload their vaccine card to an HRIS, etc.?]* For subsequent testing, vaccination status should be supplied at least 3 days prior to the test date. Please only include information that allows us to assess your status (name, dates of vaccines, type of vaccine) and remove or mark out any personal medical information otherwise.

Employees who have been approved to work from home and do not enter the office will also be excluded from the testing program. Their supervisors should alert Human Resources and should alert Human Resources if their work at home status changes. Employees who begin to enter the office, instead of working from home fulltime, should report for testing and continue testing in accordance with this policy.

**Confidentiality**

Vaccination status and testing results are confidential medical information. In accordance with the ADA, any medical records for an employee will be kept in a confidential file. Records and knowledge of information will be maintained in compliance with all applicable legal requirements.