COVID-19 Testing, Daily Symptom Checking, and Contact Tracing Policy

General Description

Policy Summary:
The COVID-19 pandemic has created risks and challenges for the Trinity community. Trinity has adopted COVID-19 policies that reflect public health guidance, including from the CDC, state and local officials, and public health and medical experts, in order to limit the presence and spread of COVID-19 on campus. This policy outlines the COVID-19 testing, daily symptom checking, and contact tracing requirements that apply to faculty, staff, and students who are working, living, learning, engaging in activities, and otherwise present on Trinity University’s campus, as well as those who are participating in recognized and approved off-campus activities (e.g., intercollegiate athletics). The requirements under this policy were put into place prior to the Fall 2020 semester and are anticipated to continue for the duration of the COVID-19 pandemic, subject to modifications by Trinity, including based upon the current public health conditions and recommendations by government officials and public health and medical experts.

Purpose:
The purpose of this policy is to outline the COVID-19 testing, daily symptom checking, and contact tracing requirements that are in place to protect the health and welfare of the Trinity University community, including by identifying and monitoring potential instances of COVID-19 infection and to utilize that information to reduce transmission on Trinity’s campus.

Scope:
This policy applies to all faculty, staff, and students.

Exceptions:
Student Athletes and staff in Athletics may be subject to additional testing and contact tracing requirements, as required by Trinity, SCAC, and the NCAA.

Policy Content

Overview

Faculty, staff, and students who are working, living, learning, engaging in activities, and/or otherwise present on Trinity University’s campus or who are participating in recognized and approved off-campus activities (e.g., intercollegiate athletics) are required to participate in COVID-19 testing, daily symptom checking, and contact tracing requirements as outlined in this policy. Individuals who are working or learning entirely remotely are not required to participate in testing, daily symptom checking, and contact tracing. Testing, daily symptom checking, and contact tracing are only part of Trinity's efforts to address the risk of COVID-19 transmission on
campus. Trinity faculty, staff, and students must also comply with Trinity's other COVID-19 policies, including, for example, the COVID-19 Illness, Quarantine, and Isolation Policy and the COVID-19 Policy on Protective Behavior.

Daily Symptom Checking

Tracking COVID-19 symptoms is one way Trinity is working to identify and respond to potential instances of COVID-19 on campus. Faculty, staff, and students who are present on campus or participating in recognized University activities off-campus (e.g., intercollegiate athletic participation) are required to participate in daily symptom checking in order to monitor for COVID-19.

Daily symptom checking should be completed using the ProtecTU Health Check Questionnaire on a computer or mobile device. Individuals may also text “Trinity” to 47225 to receive a link to the questionnaire. Individuals who need assistance with accessing the questionnaire or to request the questionnaire in another format should contact nervecenter@trinity.edu. Faculty, staff, and students who are not present on campus are encouraged, but not required, to utilize the daily symptom checking tool for self-monitoring.

Individuals who complete the ProtecTU Health Check Questionnaire and receive a green badge are approved to access campus for the day. If an individual does not receive a green badge, the individual is not approved to be on campus (or leave their residence hall room for persons living on campus) and will receive further instructions regarding how to proceed. Individuals may be contacted by a member of Trinity’s COVID-19 Health Team as it relates to the results of the health check.

COVID-19 Testing

Testing Requirements
Trinity University has determined that COVID-19 testing is an important public health measure to identify, mitigate, and limit the transmission of COVID-19 on campus and to address the direct threat of COVID-19 to the health of persons on Trinity’s campus. As a result, all faculty staff, and students who are working on Trinity’s campus or participating in official Trinity programs or activities off campus are required to be tested for COVID-19 as part of point in time and ongoing monitoring and surveillance testing. Special testing requirements may apply to specific programs, such as intercollegiate athletics.

Testing administered as part of Trinity’s student and employee testing programs is provided at no cost to faculty, staff, and students. Other third-party testing providers that administer supplemental testing may choose to bill employee or student insurance for elective testing.
Student and employee testing required by this Policy is administered by third-party testing companies selected by Trinity. Testing may occur under one or more of the following conditions, at Trinity’s sole discretion: prior to or upon an individual’s return to campus (such as following a break or at the start of a semester or term), as a condition of continued presence on campus, and/or during random sampling or surveillance testing. Testing requirements will be applied in a consistent, non-discriminatory manner in accordance with applicable law.

**Off-Campus Testing**
Faculty, staff, and students who are present on campus and who test positive for COVID-19 on a test administered outside of Trinity are required to report the positive test result to covidhealthteam@trinity.edu so that Trinity can initiate steps to address any risk on campus. Faculty and staff who work remotely are also asked to disclose positive COVID-19 test results to Trinity (covidhealthteam@trinity.edu) so that Trinity can provide the individual with information and resources and assess the positivity rate within its remote workforce as it relates to planning for the return of the workforce to campus.

**Test Results**
Individuals who test positive for COVID-19 as part of employee or student testing will be notified and asked to cooperate in contact tracing with Trinity personnel and/or contractors relating to their contacts on Trinity’s campus, including in order to identify risks to campus and fulfill notification requirements, as identified in this policy.

**Reasonable Accommodations and Alternate Testing**
Individuals who have a medical condition or disability that requires alternate testing or who would like to request a reasonable accommodation as it relates to the COVID-19 testing or other requirements, should contact Human Resources (for faculty and staff) or Student Accessibility Services (for students).

Individuals also have the option to seek alternate COVID-19 testing from a medical provider of their choice and to submit the results to Trinity (covidhealthteam@trinity.edu), so long as the testing meets all standards and requirements outlined by Trinity (e.g., regarding the timing and type of test). Individuals who choose to obtain alternate testing are responsible for any costs associated with the testing.

**Contact Tracing at Trinity**
Contact tracing is important to preventing the spread of COVID-19 within the Trinity community. Trinity has developed an interdisciplinary team, composed of Trinity personnel and contractors, trained to gather information in order to track contacts and alert individuals who may have been exposed to COVID-19 on the Trinity campus and as a part of Trinity’s programs and activities. Trinity’s contact tracing activity is for the purpose of addressing the risk of spread on Trinity’s campus and is separate from and in addition to any contact tracing by San Antonio Metro Health relating to the individual’s contacts within the community.
Individuals who test positive for COVID-19 as part of Trinity’s testing program will be notified of the test result and given instructions for next steps and isolation in accordance with public health guidance. A member of Trinity’s contact tracing team will contact individuals who have tested positive for COVID-19 to conduct an interview and gather information about the individual’s activities and contacts on Trinity’s campus. Members of the Trinity community are expected to cooperate fully with contact tracing. Trinity’s contact tracing team will notify the identified contacts within the Trinity community and provide direction regarding any monitoring and quarantine requirements. The identity of the individual who is positive for COVID-19 will not be revealed to the contacts.

**Privacy and Information Sharing**

Trinity respects the privacy and confidentiality of faculty, staff, and student information. Individuals are asked to complete documentation to consent to testing and information sharing. Trinity contracts with a number of partners to deliver and support student and employee testing, symptom checking, contact tracing, and COVID-19 response and shares information with these partners in order to facilitate these activities. Trinity’s COVID-19 testing partners and contractors engaged to assist with these activities will also share COVID-19 test results and information with Trinity University and its designated employees and agents for the purpose of supporting Trinity’s response to and mitigation of COVID-19 on campus. Test results and information may also be shared as required by law, such as with a public health authority.

Trinity will keep the COVID-19 test results confidential as required by applicable law (e.g., Family Educational Rights and Privacy Act, Americans with Disabilities Act, OSHA, as applicable) and share results only with those who need to know the information. Records of the test results will be kept separately from an employee’s personnel file and a student’s academic record.

Trinity may maintain a dashboard of or otherwise publish de-identified test results and information. Trinity will also notify individuals, including but not limited to those with whom a positive individual has had close contact at Trinity and those in the work, academic, or housing area, that an individual has tested positive for COVID-19, but will not identify the individual who has tested positive by name.

**Performance Evaluation**

**Consequences of Policy Violation:**

Participation in COVID-19 testing, symptom checking, and contact tracing are a condition of faculty, staff, and student presence on Trinity’s campus. Refusal to take a COVID-19 test and/or participate in symptom checking or contact tracing will result in an individual not being permitted to be present on campus.
Unless an individual is able and approved to work remotely, if a faculty or staff member refuses to test or participate, the individual may be subject to disciplinary action, up to and including termination of employment with Trinity. If a student refuses to test or participate, the student may be temporarily or permanently administratively removed from on campus housing, and/or Trinity’s campus, and/or participation in Trinity activities, and may also be subject to disciplinary action in accordance with established procedures for the Dean of Students Office.

Individuals who have concerns about the policy or believe there is good cause for refusal to participate in any requirements of the policy should contact Human Resources (for faculty and staff) or the Dean of Students Office (for students) in order to review concerns and/or determine alternate resolution.

**Revision Management**

**Revision History Log:**

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**Vice President Approval:**

Enter Vice President(s) that are responsible for approving this document

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<td>Tess Coody-Anders</td>
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