COVID-19 Workplace Positive Case Notification Protocol and Related Personnel Actions

Last updated: August 5, 2021

This document outlines the process to be followed by supervisors when a university employee or regular building occupant reports that they: (a) have tested positive for COVID-19, (b) are experiencing symptoms consistent with COVID-19, and/or (c) have had close contact with someone that has tested positive.

The goal of this protocol is to ensure appropriate rapid response to minimize the possibility of virus transmission while protecting the privacy, to the fullest extent reasonably possible, of individuals who have contracted the virus.

Employee Wellness Check and Reporting Requirements

The University rescinded its Administrative Directive on Wildcat Wellcheck in light of changing public health conditions in Southern Arizona and updated guidance issued by the Centers for Disease Control (CDC) and Pima County.

Employees and DCCs who have spent time working in UA facilities are also required to notify their supervisor immediately by phone or text if any of the following situations arise:

(a) Receipt of a positive test result for COVID-19.
(b) Onset of symptoms consistent with COVID-19, per CDC guidance.
(c) Close contact with another person that is confirmed positive for COVID-19, in or away from the workplace, per CDC definition of close contact.

Supervisor Required Actions Regarding Employee

Any written documentation prepared by the Supervisor to document the case and actions taken must be managed as confidential information, and kept in a separate confidential medical file, separate from the employee’s personnel file. For retention guidance, see: https://records.arizona.edu/retention. Supervisors should review and follow the guidance in Appendix 1 – Privacy Guidelines when Discussing Positive COVID-19 Cases in the Workplace.

In addition to the guidance in this protocol, Human Resources has developed a Workplace Decisions Guidance for Supervisors resource page for supervisors.

(a) Employee with positive test result: Supervisors are required to implement the following steps immediately upon being advised of a subordinate receiving a positive test result for COVID-19:
1. **Remove the individual from the workplace and obtain information about close contacts.** Direct the employee/DCC to go or stay home and recommend that they seek healthcare as needed to manage symptoms. Ask the affected individual to confirm the work locations they occupied for more than 15 minutes during the two days prior to receipt of their positive test result and/or onset of symptoms (whichever occurred first), and identify known close contacts in their work locations during the same time period. Close contacts are identified as being within six feet for 15 minutes or more during a workday, regardless of whether either person was wearing a face covering.

2. **Strongly encourage the employee/DCC to self-report their positive test.** Encourage the individual to self-report their positive test result through the SAFER online reporting tool. The website provides a link to the online survey portal with the Pima County Public Health Department and Mel & Enid Zuckerman College of Public Health SAFER Program for case investigation. Information submitted will provide the SAFER team with data needed to initiate contact tracing and/or case investigation. Explain that the employee’s identity and other personal/health information will be kept confidential to fullest extent possible.

3. **Explain limited disclosures that will occur.** Explain to the employee/DCC that their positive case will be reported to internal campus units for management of the case, including Campus Health, Facilities Management, Building Manager, departmental leadership, and the SAFER Program, but that personally identifying information will not be disclosed to these units without the employee’s consent. The employee/DCC’s identity will be disclosed to Risk Management Services if a workplace injury report is submitted, and to Human Resources if they are asked to consult on case management. Explain that the employee’s/DCC’s workspace colleagues and close contacts will be notified of the occurrence of a positive case in the work area/building/etc., but that the identity of the affected individual will not be disclosed. The employee/DCC may choose to notify their co-workers and others of their condition, but the University will not disclose their identity to co-workers and workspace occupants.

**(NOTE FOR SUPERVISOR) Direct Supervisor Reporting** – Self-reporting of a positive case to Campus Health and SAFER by an employee or DCC is optional/voluntary. To ensure the case is reported, supervisors are required to report positive case information through the SAFER online reporting tool by selecting the Supervisor reporting option. The supervisor will not disclose the identity of the affected individual to SAFER but will provide the locations where the employee was present and information about close contacts. SAFER will use this information to assist in notification of the employee’s close contacts in the workplace.

4. **Share health care guidance:** Advise the employee of the positive test guidance from the Campus Health website.

5. **Establish work expectations.** Determine if the employee/DCC can and will be assigned to work remotely or if the employee will need to take leave and establish expectations regarding time reporting. Refer the employee to Human Resources if the employee cannot work remotely to help determine leave options. **NOTE FOR SUPERVISOR** – It may not be possible or prudent to have this discussion immediately. Supervisors should prioritize sending the employee home, sharing
healthcare guidance, and obtaining information about the employee’s work locations and close contacts.

6. **Share return to work guidance.** Advise the employee to review the Return to Work guidelines on the [Human Resources website](http://www.example.com) and outlined in section (d) below.

**(b) Employee experiencing symptoms:** Supervisors are required to implement the following steps immediately upon learning that a subordinate is experiencing symptoms consistent with COVID-19.

1. **Remove the individual from the workplace:** Direct the employee/DCC to go or stay home and seek healthcare and testing if they have not already done so. Treat the circumstances around their absence from the workplace as confidential. If the employee subsequently notifies the supervisor that they have a positive test result for COVID-19, follow the instructions set forth in Section (a) above.

   Ask the affected individual to confirm the work locations they occupied for more than 15 minutes during the two days prior to the onset of symptoms, and to identify known close contacts in their work locations during the same time period. Close contacts are identified as being within six feet for 15 minutes or more during a workday, regardless of whether either person was wearing a face covering. This information will be held by the supervisor for use in implementing the steps in Section (a) above if the affected individual later receives a positive COVID-19 test result.

2. **Encourage testing:** Encourage the individual to contact Campus Health or their preferred healthcare provider to obtain testing. If an employee subsequently tests positive, the employee must immediately notify their supervisor.

3. **Establish work expectations.** Determine if the employee/DCC can and will be assigned to work remotely or if the employee will need to take leave and establish expectations regarding time reporting. Refer the employee to Human Resources if the employee cannot work remotely to help determine leave options. NOTE FOR SUPERVISOR – It may not be possible or prudent to have this discussion immediately. Supervisors should prioritize sending the employee home, sharing healthcare guidance, and obtaining information about the employee’s work locations and close contacts.

4. **Share return to work guidance.** Advise the employee to review the transitioning back to campus guidelines on the [Human Resources website](http://www.example.com) and outlined in section (d) below.

**(c) Employee has had close contact with a person who has tested positive for COVID-19.** Supervisors are required to implement the following steps immediately upon being advised that a subordinate had close contact with another person, either at the workplace or away from the workplace, who is confirmed positive for COVID-19.

1. The CDC defines close contact as being “within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period.” If this occurs, please direct your employee to review the [CDC recommendations](http://www.cdc.gov) for quarantine, testing, and face coverings.

2. Request that the person self-monitor for COVID-19 symptoms. If they develop symptoms, follow the instructions in the Experiencing Symptoms Protocol as outlined in section (d) below.
3. Encourage the individual to contact Campus Health or their preferred healthcare provider to obtain testing options. If an employee subsequently tests positive, the employee must immediately notify their supervisor.

**(d) Physical return to work guidance.** Advise the employee that they can physically return to the workplace as set forth below:

1. Close contact with a positive COVID-19 person, but experiencing no symptoms consistent with COVID-19:
   - The [CDC recommends](https://www.cdc.gov/coronavirus/2019-ncov/index.html) that employees may return to a physical worksite after (a) 7 days of fever- and symptom-free quarantine along with a negative COVID-19 test result (test must occur on day 5 or later) or (b) 10 days of fever- and symptom-free quarantine without a COVID-19 test. The CDC suggests a 14-day quarantine if feasible.

2. Positive COVID-19 test, but experiencing no symptoms consistent with COVID-19:
   - Employees may return to a physical worksite after 10 days of fever- and symptom-free isolation.

3. Positive COVID-19 test, and experienced symptoms consistent with COVID-19:
   - Individual may return to work after at least 10 days since symptoms first appeared, and fever-free for 24 hours without fever-reducing medication; **AND**
   - Symptoms have improved.

4. Not tested or results unknown and experiencing symptoms consistent with COVID-19, OR negative COVID-19 test, but experiencing symptoms consistent with COVID-19:
   - At least 10 days have passed since symptoms first appeared, **AND**
   - No fever for 24 hours without using fever reducing medication, **AND**
   - Symptoms are improving.

**Employees who are experiencing symptoms and have not had a test are strongly encouraged to get tested.**

### Supervisor Required Reporting

When an employee/DCC reports a positive test result, supervisors are to immediately report the positive result to the following individuals/departments — **without identifying the affected individual**. These contacts and reports should be done as close to the same time as reasonably possible. Please refer to Privacy Guidelines for Discussing Positive COVID-19 Cases in the Workplace in Appendix 1.

1. **Close Contacts.** Advise close contacts identified by the affected individual that a positive case has been identified in their work area, without identifying the affected individual or details of their condition. The procedure outlined above in Section (c) is applicable to those who have close contact with an individual who has tested positive. Advise close contacts that they will also be contacted by the SAFER program as part of their case investigation and contact tracing process. Advise close contacts that work areas frequented by the affected individual will be cleaned and disinfected by Facilities Management.
2. **Building Manager (If applicable).** Advise the Building Manager of the presence of a test-positive case and the potentially affected areas in the building (*without identifying the affected individual*). The Building Manager is then responsible for making the following contacts. If the supervisor is unable to contact the Building Manager, the supervisor should make these contacts.

   i. **Facilities Management (FM).** Report the notification (*without identifying the affected individual*) to the FM Work Control Desk by calling 520-621-3000. This will initiate notification to FM leadership and issuance of an Environmental Alert to affected FM staff, and UAPD, Risk Management, and Campus Health.

   FM will determine whether enhanced cleaning and disinfection of affected areas is needed, based on CDC guidance, and implement as needed.

   *If it has been less than 7 days since the test-positive individual has been in the facility, close off areas where the affected employee worked or was present for prolonged periods, and arrange enhanced cleaning and disinfection of those areas. FM will coordinate space closures (and the need for related signage) with the Building Manager. Supervisors and Building Managers are authorized to instruct occupants of affected spaces to vacate the area until enhanced cleaning has been completed.*

   *If it has been 7 days or more since the test-positive individual used the facility, enhanced cleaning and disinfection is not necessary; regular cleaning and disinfection of high-touch surfaces should continue.*

   ii. **Department Head(s).** Notify the applicable department head(s) for the affected employee/DCCs of the existence of a positive case in the building, (*without identifying the affected individual*) to coordinate notification to building occupants.

   Department heads should notify their respective Dean or VP of a positive case in their building or area, *without identifying the affected individual*.

   The dean, director, or department head should email a notification to building occupants of a positive case in the building, *without identification of the affected individual or details of their condition*, with copy to the Human Resources COVID Response Group (HR-COVID19-Questions@email.arizona.edu). This notification should explain that close contacts are being identified and will be contacted individually with guidance and instructions. Building occupants should be reminded to respect the individual’s privacy and to continue with standard guidance to minimize risk of infection. Please refer to Privacy Guidelines for Discussing Positive COVID-19 Cases in the Workplace in Appendix 1.

3. **SAFER Program.** The Student Aid for Field Epidemiology Response (SAFER) program has been authorized by the Pima County Health Department to assist with contact tracing and case investigation. As described in section (a)2 above, employees should be strongly encouraged to report their positive test result to SAFER, using the link to the online reporting tool. The supervisor should also report the existence of the positive case to SAFER without identifying the affected individual. When SAFER is notified of a positive UA employee case, one or more case managers will be assigned to work with the affected individual (if the employee voluntarily reported their case) and/or call identified close contacts as soon as possible to advise them that they may have had close contact with
a person known to be positive for COVID-19. Close contacts will be advised on matters related to self-quarantine, testing, and other follow-up, based on the nature of their contact with the positive UA employee, but personally identifying information will not be disclosed.

4. **Campus Health.** Notify the Medical Director or Assistant Medical Director of Campus Health by email or phone (520-621-9202) of a positive case in a UA building, **without identifying the affected individual.**
   - i. Alert Campus Health of possible testing requests.
   - ii. Campus Health will work with affected individuals who contact them about testing, as well as any associated follow up needed.

5. **Human Resources COVID Response Group.** (HR-COVID19-Questions@email.arizona.edu) Human Resources has organized a team of professionals to assist supervisors with management of COVID-19 cases in their employee group. This team can assist with process, regulatory issues, leave and return to work issues, and dispute resolution.

6. **Risk Management Services.** Report an employee’s test positive result as a potential workplace injury via the [online reporting portal](#). The affected individual must be identified in this report.

**Other Information for Supervisors**

**Campus Contractors and Vendors.** UA employees may be in regular contact with contractor and vendor personnel working in UA facilities and construction projects. It is important to have notification protocols going in both directions when a positive COVID-19 case is identified involving either contractor personnel, or UA personnel.

1. Procurement & Contracting Services (PACS) has added new language to purchasing documents and contract templates to require vendors who work on/at UA facilities to follow CDC guidelines as they perform service for the UA.

2. Project managers for PD&C, FM, and others overseeing UA projects will contact all current project contractors, JOC firms, and renovation contractors, and consultants to advise them of the UA’s expectation about COVID-19 notifications, as follows:
   - i. In the event a contractor becomes aware that an individual working on a UA project has tested positive for COVID-19, the contractor shall notify the UA project manager immediately. Without identifying affected individuals, the notification shall include known facts about where the individual worked, recent dates worked, onset of symptoms, and any known UA personnel contacts two days prior to the onset of symptoms or receipt of a positive test result, whichever occurred first. The project manager will report this notification to the supervisor(s) of UA personnel that may have had contact and will then implement the applicable steps outlined above in this protocol. Contractors and vendors remain responsible for management of their own personnel, in accordance with CDC guidance.
ii. In the event a UA employee who interfaces with contractor/vendor personnel receives a positive test result, their supervisor shall notify the UA project manager, who will notify the appropriate construction manager. Without identifying affected individuals, the notification shall include known facts about where the individual worked, recent dates worked, onset of symptoms, and any known contractor personnel contacts two days prior to the onset of symptoms or receipt of a positive test result, whichever occurred first.

Appendix 1 – Privacy Guidelines when Discussing Positive COVID-19 Cases in the Workplace

Appendix 2 – Contact Tracing Flowchart

References
1. UA Main COVID-19 Information Webpage
2. UA Human Resources
3. CDC – COVID-19 information