

## Baylor Notification Procedures for Individuals Presumptively Positive or with Positive Tests for COVID-19

### I. Responsibilities of Those Who are Presumed Positive or Test Positive for COVID-19

*This procedure only addresses notification upon positive test results and those who are presumptively positive. Employees must comply with HR's "Baylor's Health & Safety Guide for Returning to Campus" and the Baylor "[Keep Working \(Return to Campus\)](#)" website for directions on what to do if they are exposed to others who test positive, are suspected of being positive, or how to get cleared to return to work if they test positive. Students must comply with the procedures outlined on Baylor's [Coronavirus \(COVID-19\) Information FAQs website](#) for comparable information, for example on self-isolation when positive. If a student tests positive once the semester has started, please refer to the "Baylor Student Guide for Returning to Campus" for details about self-isolation housing and available support for students. Student Athletes should also consult Athletic Department materials. Similarly, vendors must comply with campus access requirements as articulated by Business and Campus Services.*

Certain notifications are necessary so that appropriate actions can occur to reduce the spread of the COVID-19 virus and to properly continue the Baylor University experience for those who are infected, such as students who need housing for self-isolation. People who are presumptively positive or test positive for COVID-19 infection will be asked to provide a recent history of where they have been on campus and with whom in the Baylor community they have closely interacted with starting with 48 hours prior to the presence of symptoms. This process is commonly known as "contact tracing" and is used to identify who may have been exposed to the virus so those individuals can self-isolate as appropriate and to identify areas that may need additional disinfection on Baylor campus.

- **Employees**

Employees (faculty and staff) who are presumed to be positive or who test positive for COVID-19 infection must immediately notify their Supervisor and Human Resource Consultant (HRC).

- **Students**

Students who are presumed to be positive or who test positive at off-campus medical providers for COVID-19 infection must immediately notify Health Services by calling (254) 710-1010. Students who test positive at on-campus Health Services may rely on Health Services to make the necessary notifications to the campus community with a business reason to know and to Public Health.

- **Contractors and Vendors**

Event organizers on campus have been notified of their responsibility to have contractors and vendors who are working for their event complete and sign the Baylor University COVID-19 Policy/Questionnaire to On-Campus Operations. This Questionnaire notifies the contractor/vendor that it is to contact its Baylor University department contact immediately if any members of the contractor's/vendor's on-campus team become positive or presumed positive within 14 days of when they were last on campus. The event organizer will then contact EHS for any needed contact tracing.

Contractors who work on campus other than for a specific event are required to immediately **notify Business and Campus Services** if one of their employees is presumed to be positive or tests positive for COVID-19 infection within 14 days of when they were last on campus. Business and Campus Services

will provide notification to contractors of this requirement. It is the contractors' responsibility to notify their employees and sub-contractors of notice requirements.

## **II. Responsibilities of Baylor Supporting Individuals and Offices Upon Notice of a Presumed Positive or Positive Test for COVID-19**

Nothing in this document or associated Baylor communications create contractual rights between Baylor and any person, entity or organization.

This document does not in and of itself create any legal obligation on behalf of Baylor. Baylor employees must comply with privacy laws and policies, to include HIPAA, FERPA, and Baylor Personnel Policies, which govern the privacy of medical information, to include COVID test results. All emails should include notice that the email contains confidential medical information.

- **Health Services**

- For tests administered by Baylor Health Services, Health Services will notify **EHS** of any presumptive positive or positive result for COVID-19 infection as soon as possible but no later than close of business the day they receive results. Notice will be via email and phone. This information will also be provided to the University's Contact Tracing team for appropriate follow up.
- Health Services will notify Campus Living & Learning of any presumptive positive or positive result for COVID-19 infection of any student living in on-campus housing.
- Standard protocols will be followed to notify the person to whom they administered the test.
- Health Services will notify the Waco-McLennan County **Public Health District** for all positive tests according to Public Health standards to ensure contact tracing is performed.
- Consistent with governmental declarations and executive orders on the public health emergency associated with COVID-19, Department of Education guidance on FERPA and COVID-19, and Baylor's FERPA Policy, Baylor has determined that COVID-19 constitutes a health and safety emergency such that, in order for public health authorities and parents/guardians to protect the health or safety of the student or other individuals, it may be necessary on a case-by-case basis for Baylor to disclose, with or without prior written consent, Personally Identifiable Information from student education records to those authorities and the parent/guardian of a student who has been diagnosed with COVID-19. This disclosure includes the results of positive COVID-19 tests. However, Baylor is not required to provide such notification to parents or guardians. Health Services will make this determination when appropriate.

- **Supervisors**

Supervisors will immediately **notify their HRC** via phone or email if their employee reports being presumptively positive or positive for COVID-19 infection. The email will provide the employee's name and contact information.

- **Human Resources**

HRCs will **notify EHS** as soon as possible but no later than close of business the day they are notified. Notice will be made via email. The email will provide the employee's name and contact information. This information will also be provided to the University's Contact Tracing team for appropriate follow up.

- **Business and Support Services**

Business and Support Services will **notify EHS** as soon as possible but no later than close of business the day they are notified of any contractor or vendor reporting as presumptive positive or positive result for COVID-19 infection as soon as possible but no later than close of business the day they receive results. Notice will be made via email. The email will provide the employee's name and contact information. This information will also be provided to the University's Contact Tracing team for appropriate follow up.

- **Environmental Health and Safety**

- EHS will notify Aramark as soon as possible but no later than the same day they receive notice. The email will identify locations rather than the person's name so that Aramark can post signage, conduct Level 3 cleaning of workspaces, and support other issues such as student self-isolation housing.<sup>1</sup>
- EHS will conduct contact tracing of presumed positive cases given that Public Health does not start contract tracing until a person has a confirmed positive COVID test. Tracing information will be relayed to the Medical Director for transmission to Public Health if an employee is later confirmed positive. EHS will work closely with HR on employee matters, Student Life on student matters, Athletics on student athletes, and Procurement on vendor cases.

### III. Follow-Up Contact Tracking Responsibilities

- The respective office that is notified of the presumptively positive or positive (e.g. Human Resources, Baylor Health Services, Baylor Athletics, Business and Campus Services, etc.) will provide this information to the University's Contact Tracing Team who will maintain a confidential list of the status of employees, students, contractors, etc. who are presumptively positive or positive, and the return to work date. The Contact Tracing team will work with HR, CL&L and others, to advise when the individual is cleared to return to work or class.
- Data gathered by the Contact Tracing Team will be consolidated and presented to University stakeholders, including President's Council.
  - **VP of Internal Administration and Compliance (PC)**
  - **Chief Compliance and Risk Officer (Insurance, Worker's Comp, Clery)**
  - **AVP Media and Public Relations** Baylor will continue to update the [Coronavirus website](#) daily to reflect statistics released each day.
  - **AVP for Student Life (if students, SL employees or contractors)** SL will support EHS in contact tracing and provide housing and other supports.
  - **AVP for Facilities.** Facilities will work with Student Life to post appropriate notices regarding isolation and quarantine housing on-campus.

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<sup>1</sup> EHS will verify workspaces are disinfected prior to staff returning to the space and Student Life and Facilities will work together to ensure students rooms are disinfected.

- **VP Undergraduate Education** (if faculty, students, or contractors supporting academic instruction)
- **Health Services (Medical Director)** (if not already aware due to an in-house test)
- **Human Resources** (if faculty or students on cases for which HR is not already aware)
- **Assistant Athletic Director for Health and Wellness Athletics** (if athletics employee, contractor, or student-athlete) Athletics-related information will be posted on their website and as appropriate in accordance with the [Re-United Plan](#).
- **Emergency Notification** Emergency Management/DPS, as appropriate and in coordination with the Clery Office, will issue an emergency notification when there is an immediate or on-going threat to the campus community.