

**University of Denver Written Compliance Plan for  
DDPHE Public Health Order for Institutes of Higher Education  
Issued September 24, 2020**

Below is the written compliance plan for the University of Denver (DU) to address the requirements set forth in the Denver Department of Public Health & Environment (DDPHE) Public Health Order for Institutes of Higher Education (the Order). The Order is quoted in italics and bold, with the University's compliance initiatives indicated beneath each.

The University began taking action in response to the pandemic in February 2020, with the recall of our study abroad students, and has been heavily engaged in proactive pandemic management. Beginning in July of 2020, we integrated a strong partnership with physician-scientists at National Jewish Health (NJH), including pulmonologists, environmental health and infectious disease doctors, epidemiologists, and the molecular virology laboratory to help manage reopening of campus. NJH has expertise in testing for the virus that causes COVID-19, and to date we have collaboratively collected over 11,000 tests. They further lend expertise in respiratory infections, contact tracing, epidemiology, and transmission mitigation. In the past weeks, we have appreciated our increased collaborative relationship with DDPHE in implementing swift action to limit the spread of the virus on our campus and the community.

***In order to minimize the spread of COVID-19, this order hereby directs institutes of higher education to increase mitigation efforts. Specifically, institutes of higher education shall complete each of the following:***

***Conduct daily health screenings of students, faculty, staff, vendors, and all other campus guests such that that any individual experiencing symptoms consistent with COVID-19 is restricted access to any building (other than their place of residence or to seek medical attention) and any practice or athletic event.***

The University of Denver has required daily symptom monitoring since May 11, 2020 for any DU personnel or visitors who are approved to access campus, with minimal exceptions. DU has expanded this requirement to include students as they returned to campus for classes.

If an individual reports (a) shortness of breath or cough; or (b) two or more of the following – fever or chills, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, diarrhea), the individual receives a message that they are not allowed on campus.

In response to the Order, DU has enhanced its symptom monitoring requirements in the following ways:

1. If an individual reports symptoms that would result in a message denying authorization to return to campus, the University will also restrict their DU ID card access to prevent the individual from entering buildings on campus. The access restriction will continue until each of the following has occurred: (a) 10 days have passed since the symptoms first appeared; (b) the individual is fever free (without fever reducing medicine) for at least 24 hours; and (c) their other symptoms are improving. If the individual provides documentation of a negative test for the virus that causes COVID-19 and b) and c) are true, the 10 days may be shortened.
2. Previously, DU allowed individual vendors and contractors to use their employers' screening procedures. DU is now requiring all vendors and contractors to use DU's

visitor symptom monitoring survey. DU's Shared Services Center, which manages procurement functions, has distributed a QR code to DU's vendors and contractors to facilitate compliance with this new requirement.

- ***Notify DDPHE as soon as possible, but not to exceed 24 hours, of all confirmed positive cases involving students, faculty, and staff.***

The University of Denver is in regular communication with both the City and County of Denver, DDPHE, and the CDPHE. Our cases are automatically reported via National Jewish Health and we provide a daily line list directly to DDPHE. Because the University's current processes fully comply with this aspect of the Order, the University does not need to implement any additional measures at this time.

- ***Implement effective efforts to ensure strict adherence to DDPHE's Face Covering Order by all students, faculty, staff, vendors, and campus guests.***

The University has found compliance with face covering requirements generally to be high. We have placed permanent signs on campus to indicate the University's requirements, distributed cloth face coverings to our community, and provided disposable face coverings at all building entrances. The University has an [compliance enforcement protocol](#) with actionable consequences for faculty, staff and students who are non-compliant. Our campus security officers regularly patrol with supplies of disposable face coverings to distribute and to encourage compliance as required. For additional information, please see our [face covering and social distancing](#) and [enforcement](#) protocols.

- ***Require all student-athletes, coaches, athletic trainers, medical personnel, and any other individual attending indoor and outdoor athletic activities to wear face coverings during all indoor and outdoor athletic activities, including practices and games, except for outdoor athletic activities where participants strictly adhere to the Distancing Requirements in CDPHE PHO 20-35. Additionally, all student-athletes, coaches, athletic trainers, and medical personnel shall wear face coverings while travelling to and from all athletic activities when travelling in the same vehicle with another individual. All visiting teams must adhere to the same face covering requirements while in Denver.***

The University has required face coverings of all athletes, coaches, athletic trainers, medical personnel and visitors since March of 2020, with the exception that, where safety would be compromised, the University had allowed student athletes to train without face coverings in specific training activities (for example where peripheral vision is necessary for safety). Immediately in response to this Order, athletics has adapted to the requirement, including where necessary, pausing training activities that cannot be completed safely with a face covering.

- ***Upon receipt of one or more confirmed positive COVID-19 cases on a single athletic team, an institute of higher education shall notify DDPHE as soon as possible, but not to exceed 24 hours, and suspend all sports programming for that team until further notice. DDPHE will evaluate the need to impose a quarantine or isolation order on members of athletic teams.***

Since the University's student-athletes returned to training in the summer of 2020, DU athletics has placed student-athletes in cohort groups within teams based on their living arrangements and training schedules. Whenever a positive case has occurred in athletics, the entire cohort has been quarantined. After discussions with DDPHE to inform them of this arrangement,

DDPHE has authorized DU to continue this practice, and wherever indicated, DU will expand the quarantine to include other individuals identified as close contacts via our digital tracing app, team schedules, badging, and manual tracing report.

**• *Develop and implement a written public health order compliance plan as soon as possible, but no later than Wednesday, September 30, 2020. The compliance plan should utilize campus security, campus police, and other necessary resources to ensure students are following existing public health orders, regardless of whether they reside on or off campus.***

This document serves as the University's written compliance plan. With the onset of the pandemic in March 2020, the University established the Emergency Operations Center (EOC), which is inclusive of all Emergency Support Functions (ESF) for University operations. The Division of Campus Safety, Facilities Planning & Management, the Division of Human Resources, the Division of Student Affairs, the Office of the Provost, the Information Technology Division, Division of Marketing & Communications, and the Office of General Counsel have worked collaboratively since the inception of DU's COVID response with a minimum of 4 weekly meetings. The EOC developed a phased response plan for each phase of the pandemic and implemented campus operational protocols, which have been updated to address state and local public health orders. These protocols and the phased response plan can be found at <https://www.du.edu/coronavirus/operations/protocols>.

**• *Restrict visitor access to all on-campus housing except for students who reside at each of those venues and other essential personnel necessary for the maintenance and operation of the facilities.***

The University is currently in compliance with this requirement of the Order. We discussed with DDPHE that our residential students do all eat meals at each of the residence halls with dining facilities. These first-floor dining facilities are separated from the living areas, and living areas are only accessible by residents of the building and core staff. The dining halls further follow strict restaurant social distancing arrangements, require face coverings, and otherwise follow food service guidelines.

**• *DDPHE has observed a surge in COVID-19 cases due to groups of students gathering in violation of the gathering limits established in CDPHE PHO 20-35. Accordingly, an institute of higher education shall take any actions available to them (such as enforcement of student ethics code violations) against any student, faculty, or staff member who the institute learns has failed to comply with any public health order or school policy related to the COVID-19 pandemic.***

The University is in compliance with this requirement of the Order. The Office of Student Rights & Responsibilities has and will continue to use the student conduct process to address all reported violations by students of the University's COVID-19 protocols, which are based on the requirements of the public health orders. Among the consequences for breach of these COVID-19 protocols are requiring individuals to submit to a mid-turbinate nasal swab for SARS-COV-2 RT-PCR, and to remain on location restriction (in their residence hall room) until all members of their social group who participated in the violation have received negative results for the virus that causes COVID-19. More serious violations of the University's COVID-19 protocols may result in interim suspension or expulsion. Reports of faculty and staff violation of COVID-19 protocols are handled as a Human Resources matter through the employee's supervisor. Although there have been minimal issues with employee compliance, where needed, the Office

of the Provost has and will be integrated to quickly address the situation. The possible sanctions for employees include a verbal warning, a written reprimand, and other employment sanctions up to and including termination. For more information please see the University's [compliance protocol](#). Please also see the record of strong communications from [senior leadership](#) describing and reinforcing our policies and the ramifications of violations.

**• DDPHE recommends that institutes of higher education voluntarily suspend all non-essential activities, including in-person extracurricular social activities sponsored or supported by the institute of higher education. Essential activities may include:**

- o Education and classes as a part of a students required course work;**
- o Training and other support for essential workforce activities;**
- o Activities required for faculty to carry out distance-learning and other remote activities;**
- o Essential research projects;**
- o Activities required to maintain minimum basic operations; and**
- o Any activities carried out as part of State or City COVID-19 response.**

Currently, the University has restricted events to no more than 50 people, has developed a thorough [events protocol](#), and maintains a line list of events and registrants. All of DU's courses offer a remote participation option, and faculty are not permitted to discourage students from remote participation. Further, many classes are designed as hyflex (where students determine whether they are in person or remote) and hybrid (reduced proportion of face to face activities). We do believe that engagement in socially distant, University-supported activities like in-person classes diminishes violations and allows us to continue to monitor student behavior and symptoms. While under this Order, DU intends to continue to allow in-person classes, research, and small group activities to balance students physical and mental health and intellectual and social needs. Faculty and staff have moved many meetings and activities to be remote. Office hours are remote. DU has measured all rooms in all buildings on campus via auto-cad software and again in person and has removed furniture and placed signs that state room occupancy and indicate seating locations that are a minimum of 6 feet (radius) apart. For more information, please see DU's COVID-19 [research](#) and [clinical](#) protocols as well as our [cleaning and disinfection](#) protocol.