



## COVID-19 Mandatory Testing Protocol

*The University has adopted this protocol to comply with applicable state and local public health orders and to be consistent with applicable federal and state guidance. The Provost's Office may issue updated protocols, which become effective upon adoption, to respond to changes in state and local public health orders, to be consistent with new federal and state guidance, and/or to adapt to changing conditions on campus. Please watch for updates to these protocols and regularly check the [DU COVID-19 website](#) for news and other important information.*

Following a comprehensive review of colleges and university performance in fall term 2020, the University of Denver (DU) identified eight institutions that operated their fall term in person with case counts/positivity rates at or below DU's case counts/positivity rates in surrounding communities with COVID-19 prevalence conditions at or above those in Denver. To manage the higher expected positivity conditions in winter term, DU changed its COVID-19 testing program and significantly increased test frequency. As a result of the increased test frequency, DU rapidly identified and isolated connected cases, maintained positivity rates that were much lower than the surrounding community, and determined that viral loads in identified cases were lower based on early detection of positive cases.

All students, faculty, staff, and other personnel participating in any on-campus activities at DU must participate in DU's COVID-19 testing program on the schedule set forth below. This includes all students, faculty, staff and other personnel who live, work, and/or attend classes on campus. All students living in Congregate Housing or who have close contact with other DU students must participate in the mandatory testing program.

For purposes of this protocol:

- Congregate Housing includes:
  - University owned or operated housing, such as residence halls and apartment communities; and
  - Fraternity and sorority housing, whether University owned or operated or privately owned.
- Higher Contact includes staff and other personnel who:
  - (a) daily or frequently work within University owned or operated housing and/or in indoor athletic or health facilities used by students;
  - (b) frequently interact in person with students outside of an academic setting; and/or
  - (c) work in-person with children in educational settings on campus.

DU notifies individuals whom DU has designated as Higher Contact; individuals who believe they are Higher Contact may voluntarily test at this frequency. Categories of Higher Contact may include, but are not limited to:

- Custodial Services personnel
- Dining Services personnel
- Residence Hall Maintenance personnel
- Division of Campus Safety personnel
- Health & Counseling Center personnel

- Athletics & Recreation staff
  - Fisher Early Learning Center teachers and staff
  - Ricks Center for Gifted Children teachers and staff
- Lower Contact includes faculty, staff and other personnel who have not been designated as Higher Contact.
  - Verified Record of Full Vaccination means that:
    - Two weeks have passed since the individual received a Johnson & Johnson/Janssen vaccine or the second dose of the Pfizer or Moderna vaccine;
    - The individual has uploaded their vaccine record to their MyHealth account; and
    - The Health & Counseling Center has verified their vaccine record.

Exceptions:

- Students enrolled in fully online programs that normally have no in-person component on campus, such as certain offerings through University College.
- Employees who have been approved to work remotely who (a) do not come to campus and/or (b) do not have close contact with DU community members who participate in on-campus activities.
- Individuals with University-approved exemptions or accommodations based on disability and/or religion.
- Individuals who have documentation of a positive RT-PCR test in their MyHealth account within the previous 90 days.

All testing through DU's on-campus testing program is available at no charge for students, faculty, staff and other personnel. As of June 13, 2021, on-campus testing will include Salivary RT-PCR and Nasal Swab Antigen. Individual members of the campus DU community may elect to test more frequently on-campus than their required testing schedule at no charge. During return to fall surge testing, nasal testing will be offered by appointment.

Because individuals may obtain required tests at no charge on-campus, if a student, faculty or staff member chooses to comply with DU's testing requirements through their own healthcare provider, the individual is responsible for any co-pay or other out-of-pocket expense associated with such testing. The individual must upload results from an individual RT-PCR test to their MyHealth account according to the applicable schedule. Please allow time for external RT-PCR tests to result and for uploaded records to be reviewed in order to keep your campus access current. Note that during return testing for fall 2021, all testing must be completed on campus.

### Testing Schedules

- DU will assign individuals testing days, and an individual's testing schedule and testing compliance will be available through PioneerWeb.
- Either Salivary or Nasal RT-PCR tests are acceptable to meet testing requirements.
- In all cases, individuals will have a 24-hour window on either side of their testing day to complete testing and comply with testing requirements.

### Arrival testing schedule

Regardless of vaccination status, all individuals living, learning and working on the DU campus must follow the arrival testing schedule described below for Fall term 2021. Only SARS-CoV-2 PCR tests collected on campus will be accepted (i.e., no external records will be accepted for fall return testing). Please note that you are able to test via saliva without being part of the research project. Both nasal swab and saliva PCR testing will be offered during high volume testing expected during the arrival surge. Nasal testing will be available in a limited fashion at the Carepod and conducted by National Jewish Health medical technicians only Monday thru Friday from 8am to noon and 1pm to 4pm September 6<sup>th</sup> through September 24<sup>th</sup>, while Saliva testing will be available at three sites on campus inclusive of the Carepod from 8am to 4pm Monday thru Friday and 9am to 4pm on Saturday and Sunday.

During return to fall, everyone will need to be tested twice, as described below. Everyone can access their required next test information by logging into PioneerWeb and checking their campus access status report.

- **For Undergraduate Students Living in Congregate Housing (residence halls, FSL houses):**
  - Testing twice on-campus in a 7-day period and according to your schedule
  - First test on or just before move-in day (you may test just before check-in if necessary; but we encourage you to test 1-2 days before move-in if possible); tests more than 2 days before move in will not be valid for fall arrival
    - If testing 1-2 days before move-in is not possible and you have a verified full vaccination record, you may test at arrival and proceed to class
    - If testing 1-2 days before move-in is not possible and you do not have a verified full vaccination record, you will be required to remain off campus until your negative test result
  
- **For Undergraduate Students Not Living in Congregate Housing:**
  - Testing twice on-campus in a 7-day period and according to your schedule
  - First test should be taken one to two days prior to first day of class if possible
    - If testing 1-2 days before class is not possible and you have a verified full vaccination record, you may test at arrival and proceed to class
    - If testing 1-2 days before class is not possible and you do not have a verified full vaccination record, you will be required to remain off campus until your negative test result
  
- **For Graduate Students, Faculty and Staff:**
  - Testing twice on-campus in 14 days
  - First test should be taken one to two days prior to first day of class
  - Those already cleared for campus will have their testing schedule reset and required to double test within the first two weeks of the term. Monitor your Pioweb testing schedule for detailed information.
  
- For Law, all students, faculty and staff should plan to test twice, beginning just before their fall term start. Your second test date will be generated within PioneerWeb once you complete your first test and will occur within 2 weeks. Following your second test, you will revert to every other week testing if not fully vaccinated and once every 4<sup>th</sup> week testing if you are fully vaccinated and through October 2<sup>nd</sup>.

**Testing schedule through Fall Term Reintegration (October 2<sup>nd</sup>)**

- **For Undergraduate Students Living in Congregate Housing:**
  - If No Verified Record of Full Vaccination – Testing twice per week
  - With Verified Record of Full Vaccination – Testing once per week
- **For Undergraduate Students Not Living in Congregate Housing:**
  - If No Verified Record of Full Vaccination – Testing once per week
  - With Verified Record of Full Vaccination – Testing once every other week
- **For Graduate Students:**
  - If No Verified Record of Full Vaccination – Testing once every other week
  - With Verified Record of Full Vaccination – Testing once every four weeks
- **For Lower Contact Faculty, Staff and Other Personnel:**
  - If No Verified Record of Full Vaccination – Testing once every third week
  - With Verified Record of Full Vaccination – Testing once every sixth week
- **For Higher Contact Staff and Personnel:**
  - If No Verified Record of Full Vaccination – Testing once per week
  - With Verified Record of Full Vaccination – Testing once every other week

#### **Collection Methods/Test Types**

- Sample types:
  - Nasal -- A mid-turbinate Nasal Swab RT-PCR test collected at the DU testing facility by a trained medical technician.
  - Saliva -- A saliva-based test collected at various locations on campus.
- Test types:
  - **Nasal Swab RT-PCR**
    - The gold standard diagnostic test for the virus that causes COVID-19;
    - Available on campus in a limited manner; and
    - Always accepted to meet the scheduled testing requirement.
  - **Nasal Swab Antigen**
    - Yields a quick estimate of presence/absence of the virus that causes COVID-19;
    - May be used to satisfy testing requirements for student-athletes;
    - May be used for symptomatic individuals for quicker results; and
    - A positive result from a Nasal Swab Antigen test must be followed by a RT-PCR test.
  - **Salivary RT-PCR**
    - Uses the same PCR methodology as the gold standard Nasal Swab RT-PCR, but with a more easily collected sample;
    - Returns results more quickly due to on-campus testing capability; and
    - May be used for all periodic testing.

#### **Results and Repeat Testing**

- DU will notify individuals of their test results either through their MyHealth account (all test results, negative and positive, regardless of test type will be viewable here) and if relevant pursuant to the [COVID-19 Positive Test or Presumed Positive Response Protocol](#).

#### **Noncompliance with Testing Requirements**

- **Students**

- For students who fail to complete their required testing on the specified schedule based on their residential status, the COVID Coordinator will issue a notice of noncompliance. Upon receipt of the notice of noncompliance, the student must:
  - Report to a DU testing facility no later than 48 hours of the notice.
- Students who do not comply with the instructions in the notice of noncompliance will:
  - Be referred to the Office of Student Rights and Responsibilities (“SRR”) for disciplinary action; and
  - Have their campus access suspended, which means that the student is not permitted to attend class in person, to visit any on-campus dining facilities, attend any DU hosted, sponsored or approved events or other DU programming on or off campus, and/or to enter any on-campus facilities except for the Health & Counseling Center, DU testing facilities, and the student’s own residential building.
    - To remove the suspension of campus access:
      - Students with a Verified Record of Full Vaccination must have a pending RT-PCR SARS-CoV-2 test from a DU testing facility in their MyHealth account; and
      - Students with no Verified Record of Full Vaccination must have a negative RT-PCR SARS-CoV-2 test result in their MyHealth account.
- Students found responsible for violation of the Honor Code due to noncompliance with testing requirements may face outcomes including temporary or permanent removal from the University, temporary or permanent removal from University owned or operated housing, building access restrictions, training and other interventions.

- **Faculty**

- For faculty members who fail to complete their required testing on the specified schedule, the COVID Coordinator will issue a notice of noncompliance. Upon receipt of the notice of noncompliance, the faculty member must:
  - Report to the DU testing facility no later than the next business day for a RT-PCR test.
- Faculty members who do not comply with the instructions in the notice of noncompliance will:
  - Be referred to their dean for appropriate disciplinary action, which may include a letter of reprimand, denial of building access, or recommendation of initiating a process for demotion, suspension, or termination as provided the Policies and Procedures Relating to Faculty Appointment, Promotion and Tenure; and
  - Have their campus access suspended, which means that the faculty member is not permitted to attend class in person, to enter any on-campus facilities, attend any DU hosted, sponsored or approved events or other DU programming on or off campus, and/or to be on University Premises for any purpose other than to visit DU testing facilities to complete their testing requirements.
    - To remove the suspension of campus access:
      - Faculty members with a Verified Record of Full Vaccination must have a pending RT-PCR SARS-CoV-2 test from a DU testing facility in their MyHealth account; and

- Faculty members with no Verified Record of Full Vaccination must have a negative RT-PCR SARS-CoV-2 test result in their MyHealth account.

- **Staff and Other Personnel**

- For staff members and other personnel who fail to complete their required testing on the specified schedule, the COVID Coordinator will issue a notice of noncompliance. Upon receipt of the notice of noncompliance, the staff member or other personnel must:
  - Report to the DU testing facility no later than the next business day for a RT-PCR test.
- Staff members and other personnel who do not comply with the instructions in the notice of noncompliance will:
  - Be referred to their supervisor for appropriate disciplinary action, determined in consultation with the Division of Human Resources & Inclusive Community (HRIC) to determine appropriate corrective action, and which may include a verbal warning, written reprimand, denial of building access, or additional corrective action measures, up to and including termination of employment.
  - Have their campus access suspended, which means that the staff members and other personnel are not permitted to come to work on campus, to enter any on-DU facilities, attend any DU hosted, sponsored or approved events or other campus programming on or off campus, and/or to be on University Premises for any purpose other than to visit DU testing facilities to complete their testing requirements.
    - To remove the suspension of campus access:
      - Staff members and other personnel with a Verified Record of Full Vaccination must have a pending RT-PCR SARS-CoV-2 test from a DU testing facility in their MyHealth account; and
      - Staff members and other personnel with no Verified Record of Full Vaccination must have a negative RT-PCR SARS-CoV-2 test result in their MyHealth account.