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.

In response to the COVID-19 pandemic, the University of Denver (DU) has adopted several tools, including frequent mandatory testing, contact tracing, and isolation of positive cases, and other mitigation measures to reduce transmission of COVID-19 on campus while allowing DU to continue in-person instruction and other educational and extracurricular events. DU closely monitors conditions on campus and in the surrounding community to adapt the implementation of these tools in response to changing conditions and variants.

All students, faculty, staff, and other personnel engaging in any on-campus activities at DU and/or engaging in-person in internships, field placement, service learning, or off-campus experiential learning as part of their DU role or program must participate in DU’s COVID-19 testing program on the schedule applicable to their category and on the individual testing schedule set forth in PioneerWeb. 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
- Department 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.

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 telecommute 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. 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 winter return testing, limited 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 (after the winter return testing) 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 winter return testing 2022, all testing must be completed on campus.

Testing Schedules

• DU’s COVID Coordinator may communicate testing requirements and testing windows for categories of DU community members. DU community members must comply with those requirements and testing windows.
• DU will assign individuals testing days, and an individual’s testing schedule and testing compliance will be available through PioneerWeb.
• DU’s COVID Response Team may also communicate required testing dates for any DU community member based on contact tracing pursuant to the COVID-19 Positive Test or Presumed Positive Response Protocol. The COVID Response Team will communicate those testing dates via a secure message to the individual’s MyHealth account.
• Except for winter return testing, individuals will have a 24-hour window on either side of their testing day to complete testing and comply with testing requirements.
Winter return testing schedule

December 23, 2021 message from DU’s COVID Coordinator for the winter return testing requirements and testing schedule

Collection Methods/Test Types
• Sample types:
  o Nasal -- A mid-turbinate Nasal Swab RT-PCR test collected at the DU testing facility (during the times that DU offers Nasal testing) by a trained medical technician.
  o Saliva -- A saliva-based test collected at various locations on campus.
• Test types:
  o 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.
  o 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 asymptomatic individuals for quicker results; and
    ▪ A positive result from a Nasal Swab Antigen test must be followed by a RT-PCR test.
  o 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 on-campus test results (regardless of test type) either through their MyHealth account and if relevant pursuant to the COVID-19 Positive Test or Presumed Positive Response Protocol.
• Possible test results include: negative (not detected); positive (detected); inconclusive (retesting required); invalid (sample will be re-run); or QNS (quality or quantity not sufficient).
• For DU community members identified based on contact tracing pursuant to the COVID-19 Positive Test or Presumed Positive Response Protocol, DU’s COVID Response Team will identify required testing dates via a secure message to the individual’s MyHealth account.

Noncompliance with Testing Requirements
• Students
  o For students who fail to complete their required testing on the specified schedule in PioneerWeb or their MyHealth account, the COVID Coordinator will issue a notice of noncompliance.
  o Upon receipt of the notice of noncompliance, the student must report to a DU testing facility by the time and date identified in the notice.
  o 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, the student must have a verified negative RT-PCR SARS-CoV-2 test result in their MyHealth account.
  - Students who are suspected of tampering with their own or another person’s COVID-19 test sample will lose campus access immediately, and their campus access will not be restored until they have a negative result from an on-campus PCR test. Such students will also be referred to SRR for disciplinary action.
  - 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 by the time and date identified in the notice 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 must have a verified negative RT-PCR SARS-CoV-2 test result in their MyHealth account.
Faculty members who are suspected of tampering with their own or another person’s COVID-19 test sample will lose campus access immediately, and their campus access will not be restored until they have a negative result from an on-campus PCR test. Such faculty members will also be referred to their dean for appropriate disciplinary action.

**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 by the time and date identified in the notice 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 must have a verified negative RT-PCR SARS-CoV-2 test result in their MyHealth account.
- Staff members and other personnel who are suspected of tampering with their own or another person’s COVID-19 test sample will lose campus access immediately, and their campus access will not be restored until they have a negative result from an on-campus PCR test. Such staff members and other personnel will also be referred to their supervisor for appropriate disciplinary action.