Guidance for COVID-19 Exposure Management in Institutes of Higher Education

Note: This document is frequently updated. Please check the date on the webpage for the most recent version.

Recent Updates: (Changes highlighted in yellow)

10/31/2022
• Clarified close contact definitions to incorporate CDPH’s specifications for large indoor airspaces. In indoor airspaces greater than 400,000 cubic feet per floor, close contacts are individuals within 6 feet of the infected person for 15 minutes or more over a 24-hour period. In indoor airspaces 400,000 cubic feet or less per floor, close contacts are individuals who shared in the same indoor airspace with the infected person for 15 minutes or more over a 24-hour period.

7/29/2022
• Updated guidance on COVID-19 case reporting to Public Health. As of August 1, 2022, IHE will be required to report clusters of 3 or more cases of COVID-19 who were on campus at any point within the 14 days prior to illness onset date in a classroom, office, or other pre-defined or identifiable group (i.e., cohort, team/club, etc.). IHE should report the cluster with the information for the cases through SPOT immediately, and no later than 1 business day.

A targeted public health response to contain COVID-19 exposures at a community-level can help maximize the impact of the Los Angeles County Department of Public Health (DPH) COVID-19 response.

IHE are trusted community partners that can help DPH improve the timeliness and impact of the Public Health response through rapid initiation of an IHE COVID-19 Exposure Management Plan (EMP) when notified of COVID-19 cases and clusters on campus. Immediate implementation of an EMP when a single case of COVID-19 is identified at an IHE can accelerate the ability to contain the spread of infection and prevent outbreaks from occurring on campus.

The steps for managing exposures to COVID-19 cases on campus are described below and summarized in Appendix A. Because IHE will vary in the level of resources available for COVID-19 exposure management, required steps are the minimum elements that must be included in the EMP. Recommended steps include optional elements for exposure management where IHE resources are sufficient.

The term “campus” in this document refers to non-residential settings on the IHE property and residential congregate settings that house or employ large groups of IHE students and employees, both on- and off-campus.
Exposure Management Planning Prior to Identifying 1 COVID-19 Case at IHE Setting

- **Required**: A designated IHE COVID-19 Compliance Task Force that is responsible for establishing and enforcing all COVID-19 safety protocols and ensuring that staff and students receive education about COVID-19. A designated COVID-19 Compliance Officer who serves as a liaison to DPH in the event of a COVID-19 cluster or outbreak at an IHE setting.

- **Required**: A plan for establishing spaces and housing for students to safely isolate when needed. Guidance on isolation plans for students is provided in Appendix B.

- **Required**: A plan for all students and employees who have (1) symptoms consistent with COVID-19, (2) are exposed to case(s) on campus, or (3) are at an IHE with an active public health investigation to have access to diagnostic testing or be tested for COVID-19.

- **Required**: A plan to report all known COVID-19 hospitalizations and/or deaths among students or staff to DPH by sending a notification to ACDC-Education@ph.lacounty.gov.

- **Recommended**: During periods of increased community transmission, it is recommended that an IHE implement an asymptomatic screening testing program. Programs should use an FDA-authorized viral COVID-19 test, such as a Nucleic Acid Amplification Test (NAAT), which includes PCR, or an Antigen test, which includes over-the-counter or at-home tests.

- **Recommended**: Students and staff are encouraged to perform daily health screenings for infectious diseases, including COVID-19, and to stay home or seek medical care for any symptoms identified.

Exposure Management for COVID-19 Cases at IHE Setting

- **Required**: After identifying 1 confirmed COVID-19 case (student or employee), IHE Compliance Task Force instructs the case to follow Home Isolation Instructions for COVID-19 (ph.lacounty.gov/covidisolation). NOTE: a confirmed COVID-19 case is an individual who has a positive COVID-19 test. Refer to sample isolation notification letter (posted on ph.lacounty.gov/EducationToolkitIHE) for a model that can be adapted.

- Students and employees with COVID-19 can end isolation after Day* 5 ONLY if all of the following criteria are met: 1. A COVID-19 viral test** collected on Day 5 or later is negative, and 2. No fever for at least 24 hours without the use of fever-reducing medicine, and 3. Other symptoms are improving.--or--Isolation can end after Day 10 if no fever for at least 24 hours without the use of fever-reducing medicine.

  *For symptomatic students and staff, Day 0 is the first day of symptoms; Day 1 is the first full day after symptoms develop. For asymptomatic students and staff, Day 0 is the day the first positive test was collected; Day 1 is the first full day after the positive test was collected.

  **The test must be an FDA-authorized viral test (e.g., PCR or Antigen test, including at-home tests). An antigen test is preferred for testing out of isolation.

- If a student meets the criteria to leave isolation after Day 5, they are **strongly recommended** to continue to wear a highly protective mask around others for 10 days after their positive test or the first full day after their symptoms developed, except when eating or drinking. Staff with COVID-19 are **required** to wear a highly protective mask in the workplace around others, except when eating or drinking, for 10 days after symptom onset or the positive test (whichever is earlier). See ph.lacounty.gov/masks for more information.
• NOTE: For staff, per Cal/OSHA COVID-19 Prevention Emergency Temporary Standards (ETS), employers are required to fulfill the following: inform all employees about how they can obtain testing, offer testing at no cost and during paid time, and provide testing in a manner that ensures employee confidentiality. To comply with the testing requirements of the ETS, an over-the-counter (OTC) COVID-19 test may be both self-administered and self-read if verification of the results, such as a time and date stamped photograph of the result or an OTC test that uses digital reporting with time and date stamped results, is provided. Additionally, staff may request masks and respirators from their employer at no cost to staff. See Wear a Mask and Know your Rights for more information.

❑ Required: IHE Compliance Task Force works to identify all persons in the IHE with an exposure to the confirmed positive during their infectious period (Close Contacts).

• A case is considered to be infectious from 2 days before their symptoms first appeared until their isolation ends as described in the Home Isolation Instructions for COVID-19 (ph.lacounty.gov/covidisolation). A person with a positive COVID-19 test but no symptoms is considered infectious from 2 days before their test was taken until their isolation period ends.

• Close Contact: Persons are considered to have been exposed to a case during the case’s infectious period if:

  In indoor airspaces that are 400,000 cubic feet or less per floor: They shared the same indoor airspace with the infected person (case) for a cumulative total of 15 minutes or more over a 24-hour period during the infected person’s infectious period. This definition of shared indoor airspace should be applied to classrooms, offices, and other similar-sized spaces.

  In indoor airspaces that are greater than 400,000 cubic feet per floor: They were within 6 feet of the infected person (case) for a cumulative total of 15 minutes or more over a 24-hour period during the infected person’s infectious period. NOTE: Spaces that are separated by floor-to-ceiling walls (e.g., offices, suites, break/eating areas separated by floor-to-ceiling walls) are considered distinct indoor airspaces.

  NOTE: Persons with an outdoor exposure are not considered close contacts.

❑ Required: IHE Compliance Task Force works to notify all with a known exposure to a COVID-19 positive case during their infectious period at the IHE.

• Notification can be done using an individual notification or group notification method. Once exposed individuals are identified, they are notified of their exposure and actions to take. This notification can be done by an email blast or robocall. Refer to the sample notification letter document (posted on ph.lacounty.gov/EducationToolkitIHE) for a template that can be adapted.

• See section below, Actions for Close Contacts, for key notification messages to include.

Actions for Close Contacts

• Asymptomatic close contacts may remain on campus if they follow these requirements: (1) monitor for symptoms; (2) wear a highly protective mask around others indoors, except when eating or drinking, for 10 days after the last date of exposure; (3) test with an FDA-authorized viral COVID-19 test (e.g., PCR or Antigen test, including at-home tests) within 3-5 days since the last date of exposure.*
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC HEALTH
ORDER OF THE HEALTH OFFICER

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*NOTE: Asymptomatic student and staff close contacts who were previously infected with SARS-CoV-2 within the last 90 days are exempt from testing but must mask around others indoors for 10 days after the last date of exposure.

- If symptoms develop, test using an FDA-authorized viral COVID-19 test and stay home. If the test is positive, follow Home Isolation Instructions for COVID-19 (ph.lacounty.gov/covidisolation).

- Staff who are close contacts exposed at work must follow the guidance outlined in Cal/OSHA COVID-19 Prevention Emergency Temporary Standards. Please refer to Table 2 in Cal/OSHA’s COVID-19 Emergency Temporary Standards Frequently Asked Questions.

- For staff, per Cal/OSHA COVID-19 Prevention Emergency Temporary Standards (ETS), employers are required to fulfill the following testing requirements: inform all employees on how they can obtain testing, offer testing at no cost and during paid time, and provide testing in a manner that ensures employee confidentiality. To comply with the testing requirements of the ETS, an over-the-counter (OTC) COVID-19 test may be both self-administered and self-read if verification of the results, such as a time and date stamped photograph of the result or an OTC test that uses digital reporting with time and date stamped results, is provided.

- **Recommended:** IHE Compliance Task Force consults with DPH to determine whether the cases are epidemiologically linked, meaning that the affected individuals were present at some point in the same setting and during the same time period while either or both were infectious.*

  *A case is considered to be infectious from 2 days before symptoms first appeared until they are no longer required to be isolated (i.e., no fever for at least 24 hours without the use of medicine that reduces fever AND other symptoms have improved AND at least 10 days have passed since symptoms first appeared). A person with a positive COVID-19 test but no symptoms is considered infectious from 2 days before their test was taken until 10 days after their test.

- Determination of epidemiological links between cases may require further investigation to understand exposure history and identify all possible locations and persons that may have been exposed to the case while infectious at the site. NOTE: Epidemiologically linked cases include persons with identifiable connections to each other such as sharing a physical space (e.g., in a classroom, office, or gathering), indicating a higher likelihood of linked spread of disease in that setting rather than sporadic transmission from the broader community. If epidemiological links exist, IHE reinforces messages to students and employees on precautions to take to prevent spread on campuses, including implementation of site-specific interventions.

- **Required:** If IHE identifies a cluster of 3 or more confirmed cases (students and/or employees) with possible connections with each other within a 14-day period (e.g., sharing a defined physical space together like a classroom, workspace, communal area, sports activity, IHE-sponsored gathering), the IHE should proceed with the following steps:

  - The cluster must be reported immediately to DPH. Secure online reporting for notifying DPH should be done online through the secure web application, the Shared Portal for Outbreak Tracking (SPOT): https://spot.cdph.ca.gov/s/?language=en_US. If there are multiple cases to report, IHE can submit their reports using the "Bulk Upload Template" located within the SPOT Portal. All clusters with information for the cases should be
reported to Public Health immediately, and no later than 1 business day of being notified of the third, or last, case in the cluster.

- When reporting clusters, IHEs are required to include exposure location and/or group membership details, where known, to describe potential connections between the cases (e.g., dormitory name/location, classroom name/location athletic team name, gathering name/date, etc.), and where possible, which cases are close contacts of each other.

- DPH will review the submitted information to determine whether the outbreak criteria have been met and will contact the IHE within 1 business day to advise on next steps.

- Outbreak Criteria:
  - IHE Non-residential Setting: At least 3 confirmed cases with symptomatic or asymptomatic COVID-19 within a 14-day period in a group* with members who are epidemiologically linked, do not share a household, and are not a close contact of each other outside of the campus. *IHE groups include persons that share a common membership (e.g., Greek or other social organization, athletic teams, sports and recreation clubs, academic cohort, workplace on campus).
  - IHE Residential Setting*: At least 3 laboratory-confirmed cases of COVID-19 within a 14-day period in epidemiologically linked residents and/or staff within the same or multiple dwellings that share a common area. *IHE Residential Settings include on- and off-campus residential housing facilities where groups of IHE students and/or employees congregate and/or reside (e.g., on-campus residences, on- or off- campus Greek housing). Epidemiologically linked cases are those that were present at some point in the same setting at the same time while one or more cases were infectious; OR a member of a risk group as defined by public health during an outbreak. This may include persons who share a defined physical space in the dwelling indicating a higher likelihood of linked spread of disease than sporadic transmission from the community.
  - If outbreak criteria are met and DPH recommends an outbreak response, DPH will notify the IHE that an outbreak investigation is activated, and a public health investigator will communicate directly with the IHE to coordinate the response.
Appendix A: Steps for managing exposures to 1, 2, and ≥ 3 confirmed COVID-19 cases in non-residential or residential congregate settings associated with IHE

1 Case

1) **Required**: IHE instructs the case to follow Home Isolation Instructions.
2) **Required**: IHE identifies and notifies IHE contacts of exposure.

2 Cases

1) **Required**: IHE instructs the cases to follow Home Isolation Instructions.
2) **Required**: IHE identifies and notifies IHE contacts of exposure.
3) **Recommended**: If the 2 cases occurred within 14 days of each other, IHE works with DPH to determine whether the cases have epidemiological links and if links are identified, implements additional infection control measures.

3+ Cases

1) **Required**: IHE instructs the cases to follow Home Isolation Instructions.
2) **Required**: IHE identifies and notifies IHE contacts of exposure.
3) **Required**: If a cluster of 3 or more cases that have epidemiological links that occurred within a 14-day period, IHE reports this immediately to DPH using SPOT (https://spot.cdph.ca.gov/s/?language=en_US) and includes details regarding exposure location/group membership of the cases.
4) **Required**: DPH determines if outbreak criteria have been met. If outbreak criteria are met and DPH recommends an outbreak response, a public health investigator will contact the IHE to coordinate the outbreak investigation.
5) **Recommended**: IHE sends general notification to inform the relevant campus community of the exposure and precautions taken to prevent spread.
Appendix B: COVID-19 Guidance for Isolation for Students At Institutes of Higher Education

**Guidance for isolation plans for students with COVID-19:**

- If student is from local community: IHE should determine if the student is able to isolate in their family homes in accordance with Public Health’s [Home Isolation Guidance](ph.lacounty.gov/covidisolation).
- If student lives off-campus: IHE should determine if the living conditions are adequate to support isolation without putting other students at risk in accordance with Public Health’s [Home Isolation Guidance](ph.lacounty.gov/covidisolation).
- If student lives on campus in a single room: IHE should determine if the living conditions are adequate to support isolation without putting other students at risk in accordance with Public Health’s [Home Isolation Guidance](ph.lacounty.gov/covidisolation).
  - Students in isolation should be restricted to their room in the isolation area. These students cannot attend class, visit other areas of the campus (e.g., fitness center, cafeteria, library, or laundry room), go to the grocery store or pharmacy, or attend any other events or gatherings.
  - Students in isolation should not share bathrooms or common spaces with students not in isolation.
- If the off- or on-campus living quarters are not appropriate for isolation: IHE should consider developing a dedicated isolation area, such as dedicating floors, halls, or other separate living spaces for the isolation of students infected with COVID-19 in accordance with Public Health’s [Home Isolation Guidance](ph.lacounty.gov/covidisolation).
  - Students in isolation should be housed separately from other students, preferably with their own dedicated points of entry/exit, physical barriers, and visible signage to separate those in isolation from students who do not have COVID-19.
  - Students in isolation should be restricted to their room in the isolation area if there are students in the same area who are not in isolation.
  - Students in isolation may be housed together and may share bathrooms and common spaces. These students cannot attend class, visit other areas of the campus (e.g., fitness center, cafeteria, library, or laundry room), go to the grocery store or pharmacy, or attend any other events or gatherings.
  - If adequate space cannot be dedicated on campus, local hotels and motels may be able to provide sufficient short-term housing. The same isolation scheme would apply for a student in a single room on a floor with other students not on isolation.
- Efforts should be made to ensure compliance with COVID-19 isolation as per Public Health’s [Home Isolation Guidance](ph.lacounty.gov/covidisolation), either with direct monitoring or indirect monitoring (i.e. ID card monitoring, contact tracing apps on phones, etc.).
- Outside visitation is not permitted to students in isolation. If the student in isolation requires essential services, staff must wear personal protective equipment, limit their exposure to students, wash hands upon leaving the area, and monitor for signs and symptoms of illness.
- Students in isolation should be provided with any necessary supplies and services (e.g., food, cleaning supplies, laundry, thermometer, medications, information on who to contact if they become ill).

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• If the student in isolation requires medical care, the healthcare provider, emergency medical services, and anyone else assisting with the transportation of student should be notified of the student’s COVID-19 infection so they can take proper precautions.

• If the student in isolation must leave the living quarters, they are required to wear a highly protective mask, physically distance themselves from others, and go directly to/from their destination.

• Students in isolation should be given online educational access to missed classes when possible.

• Routine health checks for students in isolation should be done virtually when possible.