COVID-19 SURVEILLANCE TESTING POLICY

Policy Title: COVID-19 SURVEILLANCE TESTING POLICY

Type or category of Policy: College

Approval Authority: President’s Cabinet

Responsible Executive: Lori Ehrensback, College Risk Management Officer

Responsible Office: College Risk Office (Employees) and Student Life Compliance Office (Students)

Owner Contact: Lori Ehrensbeck, lehrensbeck@siena.edu, 518-782-6774; Jeanne Obermayer, obermayer@siena.edu, 518-783-2421

Reviewed By: Cabinet comment 8/18/20

Reviewed Date:

Last Revised and Effective Date of Revision: 12/04/2020

*This policy was developed in response to the COVID-19 crisis.*
Brief Overview of the Policy

This policy outlines the authority to administer surveillance testing for COVID-19 to faculty, staff, administrators and students as well as the general procedures for implementation.

Reason for Policy

The purpose of surveillance testing is to monitor the current state of coronavirus on campus to better identify asymptomatic cases to mitigate possible transmission of COVID-19 on campus.

Scope of the Policy: Entities or Individuals affected by this policy

- All members of the Siena College community

The Official Policy

During the fall 2020 semester and until such time as deemed no longer necessary by the President, Siena College will conduct Surveillance Testing of the current members of the community at a frequency deemed necessary based on the current state of coronavirus on campus, but no less than once every two weeks. At least 2% of employees (faculty, staff and administrators) and 2% of students will be tested per week when testing occurs. Individuals selected will be tested once over the course of the semester for regular surveillance testing. Residential students may be selected for testing multiple times during the semester based on the results of wastewater testing on campus. Each session will have new random samples drawn by the Office of Institutional Effectiveness (OIE). The random samples provided by OIE will include alternates in the event a participant is excused from testing for a given date/time.

Due to the risk associated with having undiagnosed asymptomatic COVID-19 cases on campus, participation in surveillance testing is expected as a condition of employment or attendance at the College. Only those members of the community working or studying in a college-approved 100% remote capacity are exempt from testing. All other members of the community (faculty, staff, administrators and students) randomly selected for testing are required to participate in testing at the time, date, and location assigned to them by the College even if not scheduled to be on campus on the testing date/time.

Those employees selected for testing on a given date/time who are not scheduled to be on campus and are unable to adjust their schedules to be present for testing have the following options:
1. They can choose to be tested on a future test date when they are scheduled to be on campus
2. They can choose to get tested in their community and submit the test results to the college within 10 days of the originally scheduled test. The college will provide a list of free test sites. If an individual chooses to use a different site, the employee will not be reimbursed for the cost of testing. Non-exempt employees will be compensated 1/2 hour for their time spent at an off-campus test site. In the event the time spent at the off-campus test site exceeds 1/2 hour, employees must inform Human Resources, which will review the documentation/information provided by the employee to determine compensability.
PROCEDURES

Timeframe: For the fall 2020 semester, testing will occur every other week commencing the week of August 31 and ending the week of November 20, 2020. Spring semester 2021 and future testing dates are to be determined. Testing will generally be scheduled for Monday and/or Tuesday mornings of each week. Specific dates and times to be set by the Vice President for Student Life or designee with the provider(s). The testing will take place on campus for a minimum of two hours on each scheduled date. Depending on the type of testing, participants either will be assigned to or register for a 15-minute time slot within the testing window. The Student Life Compliance Officer, College Risk Officer, a designee from the Office of Human Resources, and College Safety Officer will oversee the implementation.

Random Sampling:
The Office of Institutional Effectiveness (OIE) will pull the random samples from each population one-to-two weeks prior to the testing date. The number of people selected for the sample from each population (faculty, staff, administrators, and students) will vary based on the type of testing that is being done in a given week. Student Life will maintain the master list of testing dates/times and the number of people (employees / students) that are scheduled to be tested on a given date/time.

Student Sample:
A list of all students enrolled in classes at Siena will be generated one week prior to each testing date. Students enrolled in the current semester in a fully remote capacity will be removed from this list because they are exempt from surveillance testing. Only students with remote study paperwork on file with the Office of Student Academic Success and Engagement (SASE) are exempt from testing.

For regular surveillance testing, a stratified random sample will be drawn based on academic class for non-remote students. Stratified random sampling is a probabilistic random sampling technique that is used when the population can be divided into mutually exclusive categories, and it is important to have adequate representation from each category in the final sample. The entire process will be documented by OIE for each testing date.

The stratified student sample will have proportional representation consistent with the proportion of students from each academic class in the population. A list of alternates will also be drawn using the same stratified random sampling approach.

For days designated as wastewater surveillance testing on the student life schedule, only residential students from the residence halls where wastewater was sampled by the School of Science will be included in the population. To maximize testing of students throughout the residence hall, no roommates will be tested on the same wastewater testing day. For wastewater testing, rooms will be randomly selected from each residence hall in the population using a simple random sample. The final sample of rooms will have proportional representation consistent with the number of rooms in each residence hall. The first time a room is selected for wastewater testing, one roommate will be randomly selected from the room for inclusion in wastewater sampling. After that initial selection, the roommates will be alternated each time the room is selected for future testing.
Employee Sample

Note - this approach assumes that no comprehensive list of employees who are fully remote is available and being updated on a regular basis.

A list of all employees at Siena will be generated by the Office of Human Resources (HR) and provided to OIE one-to-two weeks prior to each testing date.

A stratified random sample will be drawn based on employment category (faculty, staff, administrator). Stratified random sampling is a probabilistic random sampling technique that is used when the population can be divided into mutually exclusive categories, and it is important to have adequate representation from each category in the final sample. The entire process will be documented by OIE for each testing date.

The stratified employee sample will have proportional representation consistent with the proportion of employees in each category in the population. A back-up list will also be drawn using the same stratified random sampling approach.

Faculty: To minimize the impact on the students’ learning, the class schedule for each faculty member selected for testing will be compared against the date/time scheduled for the COVID-19 test. Faculty will not be assigned a 15-minute time slot that overlaps with their teaching schedule. A list of faculty who appear to be fully remote (only teaching online classes) will be sent to the Risk Compliance Officer to confirm that they have not been on campus, i.e. have not completed the health check form or swiped in on a regular basis. Those faculty who are determined to be fully remote will be replaced with a faculty member from the alternate list.

Staff and Administrators: HR will contact the supervisors of the staff and administrators to inquire about whether they are working in a 100% remote capacity. Those working in a 100% remote capacity are not required to come to campus to be tested. A person from the same employee category will be randomly selected from the back-up list to replace those working remotely in the sample. Those employees not working in a 100% remote capacity are expected to come to campus for the test or use one of the alternative options listed above.

To minimize the impact on the employee’s work, once an employee is selected for testing, the employee will not be selected again during the same term.

Social Distancing Enforcement: Student Life and Human Resources personnel may be called upon to assist if needed.

Cost: The testing is at no cost to the employee and student participants. However, if a student does not show up for the test date/time on which they are scheduled, the student’s account will be charged the cost of the test.

Employees:

1. The random sample of participants and alternates will be drawn one-to-two weeks prior to the date of the testing. Human Resources will contact the supervisors of those employees to determine if the employee is working in a 100% remote capacity

2. A message will be sent out to identified employees from an email designated for Surveillance Testing at Siena for Employees by Human Resources regarding the employees’ selection for the testing that week. Questions about the testing will be directed to the Director of Health Services. Questions about exemptions will be directed to Human Resources. Human Resources/College Risk Officer responds to

Policy template Approved by President's Cabinet 25 October 2016
All policies are subject to amendment. Please refer to the Siena College Policy website for the official, most recent version.
Page 4 of 6
requests for exemptions. If an exemption is granted, an alternate will be selected to replace the exempted employee. Exemptions will only be granted if the employee is working in a 100% remote capacity or if the participant has had a positive COVID-19 test within the past three (3) months (Reasons for exceptions subject to change based on CDC guidelines). Requests for exceptions will be evaluated on a case by case basis by the College Risk Officer in consultation with the Director of Health Services. Their decision is final and not subject to appeal.

3. Depending on the type of test being conducted, the email will either include a consent form for the employee to sign and a request for permission to release employee data to the lab, or it will include a link for the employee to register themselves and give consent for the test. In the former case, blank copies of the consent form will be available at the test site. The consent is to perform the test and release the results. All employees not working in a 100% remote capacity are required to comply with the testing. Aggregate test results data will be provided to the Coronavirus Ops Center Team without any personally identifiable information.

4. Directions for participants to receive their own results will be provided at the testing site.

Students:

1. The random sample of participants will be drawn by the Office of Institutional Research one week prior to the date of the testing. Students who are fully remote for the fall semester (based on official paperwork on file with SASE) will not be included in the population from which the sample is drawn.

2. A message will be sent out to identified students from an email designated for Surveillance Testing at Siena for Students by the Student Life Compliance Officer regarding the students’ selection for the testing that week. Questions about the type of testing will be directed to the Director of Health Services. Questions about exemptions will be directed to the Student Life Compliance Officer who will respond to the request for an exemption. If an exemption is granted, an alternate will be selected to replace the exempted student. Exemptions will only be granted if the participant has had a positive COVID-19 test within the past three (3) months (Reasons for exceptions subject to change based on CDC guidelines) or is on a mandated Medical Leave as verified by the Office of Student Life or Director of Health Services. Requests for exceptions will be evaluated on a case by case basis by the Student Life Compliance Officer in consultation with the Director of Health Services. Their decision is final and not subject to appeal.

3. The email notice will also include the consent form students will be required to sign, if applicable. Blank copies of the consent form will be available at the test site. If the testing requires the individuals register online and reserve an appointment time, the consent form is included in the on-line registration. The consent is to perform the test and release the results. Test results will be released to appropriate designated college officials. All students not in an officially remote capacity are required to comply with the testing and reminded of the COVID-19 Acknowledgement and Pledge they completed prior to the start of the semester. Aggregate test result data will be provided to the Coronavirus Ops Center Team without any personally identifiable information.

4. Directions for participants to receive their own results will be provided at the testing site.
FAILURE TO COMPLY:
Employees who fail to comply with the testing requirement will be referred to their supervisor and Vice President for disciplinary action for non-compliance. Employees may be suspended without pay until they submit a test result if they fail to comply.

Students who fail to comply with the testing requirement will be referred to the Dean of Students for disciplinary action for violations of the Code of Conduct and the COVID-19 Acknowledgement and Pledge. If students do not show up for the test and do not have prior excused absence from Student Life personnel, they will be fined and their student account will be charged the cost of the test.

TESTING RESULTS:
Individual test results will be provided to appropriate designated college officials. Participants will be provided with directions on receiving their own results at the testing site.

Aggregate testing results data (without any personally identifiable information) will be provided to the Siena College Coronavirus Ops Center and reported out on the daily reports.

AMENDMENTS:
The College reserves the right to change/modify the policy’s procedures to respond quickly to changing conditions. Such changes take effect upon the approval of the VPSL in consultation with the President.

* Resources
   a. Marching Forward (College Website)
   b. Siena Life Student Handbook
   c. Siena College Faculty Handbook
   d. Siena College Administrator Handbook
   e. Siena College Staff Handbook
   f. Coronavirus Ops Center Team
   g. COVID-19 Acknowledgement and Pledge
   h. Siena College COVID-19 Employee Guide
   i. Siena College COVID-19 Student Guide


Revised: December 2020.