

SJC Wastewater Plan and Protocol for Testing of Employees

September 2020

Introduction

The COVID-19 pandemic has caused businesses and organizations to respond with diligence to protect the safety of employees. Saint Joseph's College (SJC) has learned a great deal about this virus, and continues to learn as opportunities are discovered with regards to how to best protect the College community.

Surveillance is the foundation of effective public health. Surveillance systems should detect the emergence and spread of infection within the general community and within specific campus populations.

Wastewater testing is a means of surveillance that is non-invasive, can be predictable by time, and narrows the scope of a potential COVID-19 outbreak by identifying specific populations.

With a wastewater testing program on campus, we can identify traces of the SARS-CoV-2 virus, which causes COVID-19, through the waste shed by individuals within our buildings which has then traveled through our wastewater system. And based on the level of the virus found, wastewater testing can also be a leading indicator of a worsening outbreak on campus. Ongoing monitoring of the wastewater testing results, as well as the COVID-19 testing of individuals who may have shed waste in the wastewater that is tested on campus, is critical to the success of this program.

Our Campus

SJC has the ability to isolate the wastewater of the following buildings, or groups of buildings:

- St. Joseph's Hall
- Feeney Hall
- Cassidy, Cunneen and Gingras Halls ("Quads")
- Carmel Hall
- Standish Hall
- Currier Hall
- Alford Hall
- Alford Center
- Facilities Management/Campus Services building

Of the eleven buildings listed above, seven buildings serve either as an office space and/or a residence for employees of the College. If wastewater results produce positive traces for the SARS-CoV-2 virus, the employees within those offices and/or residential spaces of the affected buildings will be notified and included in the testing process for COVID-19.

Workplace Testing

1. American's with Disabilities Act (ADA)

Under the ADA, an employer *may* require an employee to have a medical examination (COVID-19 test) or to self quarantine if the employer reasonably and objectively believes the employee poses a "direct threat", meaning a "significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation".

2. Equal Employment Opportunity Commission (EEOC)

In addition, the EEOC recently indicated that testing is permitted as a medical examination under the ADA because COVID-19 clearly creates a "direct threat" to the health of others. As such, employers may take steps to determine if employees entering the workplace have COVID-19 because an individual with the virus will pose a direct threat to the health of others.

Centers for Disease Control & Prevention (CDC)

The Centers for Disease Control and Prevention(CDC) recently updated their guidance regarding testing of employees for COVID-19. The CDC describes strategies for SARS-CoV-2 [viral testing](#) for [five categories](#) of people:

1. [Testing individuals with signs or symptoms consistent with COVID-19](#)
2. [Testing asymptomatic individuals with recent known or suspected exposure to SARS-CoV-2 to control transmission](#)
3. [Testing asymptomatic individuals without known or suspected exposure to SARS-CoV-2 for early identification in special settings](#)
4. [Testing to determine resolution of infection \(e.g., discontinuation of home isolation\)](#)
5. [Public health surveillance for SARS-CoV-2](#)

Of the five COVID-19 testing strategies, option numbers 5 and 3 are the most appropriate for the College in that order. Their respective descriptions are below:

Option 5: Public health surveillance for SARS-CoV-2

Testing is considered to be surveillance when conducted to detect transmission hot spots, or to better understand disease trends in the workplace. These goals are consistent with employer-based occupational medicine surveillance programs. Occupational medicine surveillance programs may use testing to assess the burden of SARS-CoV-2 in the workforce, assess factors that place employees at risk for workplace acquisition of SARS-CoV-2, or evaluate the effectiveness of workplace infection control programs. Surveillance should only be undertaken if the results have a reasonable likelihood of benefiting workers.

Option 3: Testing asymptomatic individuals without known or suspected exposure to SARS-CoV-2 for early identification in special settings

Viral testing of workers without symptoms may be useful to detect COVID-19 early and stop transmission quickly, particularly in areas with [moderate to substantial community transmission](#). When communities experience moderate to substantial transmission, workplace settings for which these approaches may be considered include:

- Workplaces where physical distancing is difficult and workers are in [close contact](#) (within 6 feet for 15 minutes or more) with co-workers or the public
- Workplaces in remote settings where medical evaluation or treatment may be delayed
- Workplaces where continuity of operations is a high priority (e.g., [critical infrastructure sectors](#))
- Workplaces providing congregate housing for employees (e.g. fishing vessels, offshore oil platforms, farmworker housing or wildland firefighter camps)

In summary, **Option 5** supports testing for surveillance purposes, and proactively identifying a potential trend or hot spot within a specific location. **Option 3** includes workplaces that provide congregate housing, i.e. residence halls.

Scope of Testing

If a residence hall has positive trace amounts of SARS-CoV-2 virus in its wastewater and employees either reside or work in that residence hall, they will be tested for COVID-19 as wastewater testing cannot identify a single person.

An assessment of the number of employees who work or reside in a residence hall was performed. At this time, there are a total of 46 staff within the College community who may be subject to COVID-19 testing due to the wastewater surveillance program. This includes 41 staff who work in office space within a residence hall along with 5 staff who reside in a residence hall.

Below is a list of residential dorms with office and/or residential space, and the number of employees (as of September 8, 2020) within the office or residence:

Residence Hall & Employee Information				
Residence Hall Name	Department	# of Employees	Office	Residence
Carmel Hall	Athletics	3	4	1
	Residential Life	2		
St. Joseph's Hall	IT	9	14	0
	Archives	0		
	Counseling Center	5		
Standish Hall	Campus Safety	12	12	0
Feeney Hall	Residential Life	2	1	1
Currier	Mercy Center	1	0	1
O'Conner	Health & Wellness	4	4	0
Cunneen (Quads)	Admissions	1	0	1
Cassidy (Quads)	Human Resources	6	6	0
	Mercy Center	1	0	1

Note: Student employees are also working in some residential halls. Further data will need to be collected to confirm how many students in total, which residential hall they work in, and their names to be included in the employee testing program.

COVID-19 Testing Procedure for Employees

A comprehensive, thorough, and documented procedure is necessary to follow appropriate steps to quickly identify and test the employees working/living in buildings that detect traces of SARS-CoV-2 virus in the wastewater.

An outline of the identification and testing process for employees follows:

- A residence hall tests positive for trace amounts of the SARS-CoV-2 virus
- Human Resources will be notified immediately of the residence hall name and determine if any employees either work and/or reside in the residence hall

- Human Resources will notify the manager and coordinate the notification to the employee(s) who are to be included in the COVID-19 testing due to the positive wastewater test results.
- The COVID-19 test will be administered on the employee at the SJC Health & Wellness Center during reserved time periods as outlined in the employee notification.
- If the employee is not scheduled to be on campus on the testing day, they will be paid for the time it takes to complete the testing.
- Saint Joseph's College is responsible for the cost of the test. The employee can also submit mileage expenses to/from the College for the testing.
- While test results are pending, the asymptomatic employee(s) can self-monitor and return to campus to resume working, or telecommute if applicable. Any employee with COVID-19 symptoms should not return to campus while awaiting test results and should follow CDC protocol to self-quarantine at home.
- Departments have already completed Continuity of Business Plans. These plans are within each department and retained in Human Resources. The manager(s) of the impacted employee(s) will determine the appropriate means of work coverage, including but not limited to telecommuting, etc.
- Testing results will be sent from NorDx directly to the Director of the Student Health Center at the College. The Director will also receive and process the invoices for all tests.
- Human Resources will be notified of any and all test result(s) at the direction of the Director of the Student Health Center.
- Employees who receive positive test results will be notified by the Director of the Student Health Center. Human Resources will notify employees receiving negative test results of their status. If the employee's COVID-19 test result is negative, the employee will continue to work.
- If the employee's COVID-19 test result that was initiated by the College is positive, the employee will continue to be paid while working directly with Human Resources to follow the positive test procedure, i.e. communicate with their physician, participate in contact tracing, time away from work for isolation, time off benefits if applicable, etc.
- Saint Joseph's College will notify local health officials and the College community of such cases, while maintaining confidentiality in accordance with the Americans with Disability Act (ADA), FERPA, and/or other applicable laws and regulations.
- Employees who are considered "close contacts" of a person who tested positive for COVID-19 will also be tested. The employee will remain in quarantine until the test results are returned and the quarantine period is completed.

- If negative for COVID-19, the employee will need to remain in quarantine for 14 days to ensure they do not develop COVID-19 symptoms.
- If positive for COVID-19, the employee will continue to be paid while working directly with Human Resources to follow the positive test procedure, i.e. communicate with their physician, participate in contact tracing, time away from work for isolation, time off benefits if applicable, etc.
- The College will inform those who have had close contact with a person diagnosed with COVID-19 at the College to schedule a COVID-19 test at the Health & Wellness Center, follow CDC guidance (including a 14 day quarantine), and Saint Joseph's College protocols.
- In the event the employee declines the College's request to be tested as part of this program, the employee will not be allowed to work and will be placed on unpaid leave. Depending upon the circumstances, this may lead to disciplinary action including and up to termination.
- Confidential records will be maintained documenting the testing activity.

Conclusion

The safety and health of our employees and students is our top priority. Saint Joseph's College is confident that through this proactive surveillance investment, the College is prepared to respond immediately to positive traces of SARS-CoV-2 virus in wastewater testing including this provision for employees to be tested as part of this program.

SJC will continue to identify and consider additional safety opportunities for our community as they arise. In the event of the increase of positive diagnoses of COVID-19 within our College community, the College may deploy random and universal testing of all employees.