

CONTACT TRACING POLICY

CONTACT TRACING GENERALLY

Contact tracing is the process used to identify those who come into contact with people who have tested positive for a contagious disease, including COVID-19. Contact tracing is a long-standing practice and an integral function of local health departments in keeping communities safe from the spread of disease.

Upon notification that an individual has tested positive for COVID-19, the school's local health department will undertake efforts to determine close contacts to whom the individual may have spread the virus. A close contact is defined by the New Jersey Department of Health as being within six feet for a period of at least 10 continuous minutes.

Trained professionals from the community then notify those close contacts to recommend steps to mitigate the further spread of disease. These steps may include self-quarantining, and providing critical education and support to accomplish mitigation strategies.

According to the Centers for Disease Control ("CDC"), contact tracing for COVID-19 typically involves the following:

- Interviewing people with COVID-19 to identify everyone with whom they had close contact during the time they may have been infectious;
- Notifying contacts of their potential exposure;
- Referring contacts for testing;
- Monitoring contacts for signs and symptoms of COVID-19; and
- Connecting contacts with services they might need during the self-quarantine period.

"Symptoms of COVID-19" include those identified by the CDC. While the list may continue to be updated by the CDC, symptoms currently include, but are not limited to, fever, chills, cough, shortness of breath, difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea.¹

By virtue of the highly coordinated and scheduled environment that exists in the school community, schools likely will have detailed knowledge of individuals who may have had close contact with an individual who has tested positive for COVID-19. This information may be valuable in facilitating the contact tracing process between the school and local health officials.

¹ Symptoms list taken from the Centers for Disease Control and Prevention on July 27, 2020.

INTERNAL PROCEDURES FOR CONTACT TRACING

The following procedures should be followed in the event that a school official becomes aware of a suspected or confirmed case of COVID-19.

All school administrators, school safety specialists, counselors, and any other staff deemed appropriate by the school, will be provided with information regarding the role of contact tracing in keeping school communities safe from the spread of contagious disease.

School officials will engage their school nurses to develop further contact tracing procedures, as well as educate the broader school community on the importance of contact tracing.

School officials shall designate staff to serve as liaisons to local health officials. Designated Liaisons shall be responsible for notification of the following:

- local health department;
- staff, families and the public;
- other components of this policy as directed by the school leader or designee

A designated school official shall consult with the local health department to identify the school's specific responsibilities in assisting with contact tracing activities, including ongoing communication with the identified individual and/or their contacts.

In order to be prepared to assist local health officials with contact tracing efforts, the school will maintain accurate, up-to-date records regarding cohort and classroom assignments, schedules, and attendance.

NOTIFYING CLOSE CONTACTS OF POTENTIAL EXPOSURE TO COVID-19

In addition to reporting to local health officials as set forth below, and in accordance with the Coronavirus Emergency Response Plan, the school will identify and notify individuals believed to have been in close contact with an individual who has tested positive for COVID-19 of their potential exposure. The school will consult with local health officials for guidance prior to making such notification, and will ensure that no information is provided that would permit individual identification of the person who has tested positive.

REPORTING SUSPECTED OR POSITIVE CASES OF COVID-19 TO LOCAL HEALTH OFFICIALS

Employees and students/parents/caregivers are required to report a positive test for COVID-19, or symptoms of COVID-19 in accordance with the school's Screening and Suspected Communicable Disease Policy. Upon becoming aware that a member of the school community has tested positive for COVID-19, or that a person with COVID-19 or suspected COVID-19 may have been on the premises of the school while infected, the school will follow the procedures set forth in the "Coronavirus Emergency Preparedness and Response Plan."

SCHOOL NURSE immediately will notify local health officials where indicated in the Coronavirus Emergency Preparedness and Response Plan, and will work with local health officials to ensure that information is made available to facilitate contact tracing.

In the event of a suspected case of COVID-19, as defined in the Coronavirus Emergency Preparedness and Response Plan, the school will provide the following:

- Contact information for the ill person;
- The date the ill person developed symptoms, tested positive for COVID-19 (if known), and was last in the building;
- Types of interactions (close contacts, length of contact) the person may have had with other persons in the building or in other locations;
- Names, addresses, and telephone numbers for ill person's close contacts in the school; and
- Any other information to assist with the determination of next steps.

In the event a member of the school community or an individual who recently has been on the school premises tests positive for COVID-19, the school will provide the following:

- Contact information for the person who tested positive for COVID-19;
- The date the COVID-19 positive person developed symptoms (if applicable), tested positive for COVID-19 (if known), and was last in the building;
- Types of interactions (close contacts, length of contact) the person may have had with other persons in the building or in other locations;
- Names, addresses, and telephone numbers for ill person's close contacts in the school; and
- Any other information to assist with the determination of next steps.

OBLIGATION TO DOCUMENT IN ACCORDANCE WITH APPLICABLE LAW

The Family Education Rights and Privacy Act ("FERPA") generally prohibits educational institutions from disclosing a student's personally identifiable information ("PII") without consent. However, in an exception for emergencies, FERPA provides that schools may disclose PII without consent in the event of a threat to the health and safety of a student or other individuals. Accordingly, the school will make the above disclosures to local health officials and will comply with FERPA's documentation requirements relating to the emergency exception.

As soon as practicable following reporting the above information to local health officials, in accordance with FERPA,² the person who made the report must record in any affected student's education records the information that was disclosed to local health officials, the reason for the disclosure and the facts supporting that the disclosure was necessitated by an emergency situation, and the parties to whom information was disclosed.

LAST UPDATED: August 27, 2020

² See 34 C.F.R. § 99.32(a)(5).