COVID-19 Guidance for Educational Institutions from the Wyoming Department of Health:
What to Expect if a Student or Staff Member has COVID-19

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This document provides general guidance on what students, staff, and parents can expect if a person tests positive for COVID-19 within an educational institution. Public health officials will make specific recommendations based on each situation. Public health officials are responsible for identifying individuals with COVID-19 and for identifying contacts; this is not an expectation of school officials. Public health officials will actively reach out to notify and make recommendations for all individuals with potential exposure to COVID-19.

Case Interview

When a positive test result is reported to public health, a local or state public health official will contact the person who tested positive, or the parent if the person is less than 18 years of age, to complete an investigation and gather the following information:

● School, grade, classroom, and activities for students; job title and workplace for staff
● Symptoms and symptom onset date
● Underlying health conditions
● Close contacts including those in the home, in the school, and other close contacts. Close contacts are people that have been within six feet of a person with COVID-19 for fifteen minutes or more while the person with COVID-19 was infectious. The infectious period begins 48 hours before symptoms start (or before the test was collected if the person has no symptoms) and lasts until the person with COVID-19 is released from isolation.
● Date of last contact with the person with COVID-19 for close contacts
● Any other information deemed relevant by public health officials

The person with COVID-19 will be issued isolation orders. These orders direct the person to stay home except to seek medical care. If the person with COVID-19 has symptoms, the case will remain in isolation until:

● 10 days have passed since symptoms started, and
● The person has been fever free for 24 hours without the use of fever-reducing medication, and
● The person has noticed improvement in respiratory symptoms

If the person with COVID-19 has no symptoms, he or she will remain in isolation until at least 10 days have passed since their COVID-19 test was collected.

Communication with Schools

The school principal and/or school nurse will be contacted by public health officials to notify the school of the positive result and to gather additional information such as schedules and seating charts. Public health officials will guide the principal and school nurse through the notification process and will provide a form letter for making necessary notifications.
Disclosure of Information
The WDH receives notice of all Wyoming residents who test positive for COVID-19 in order to investigate and protect public health. See Wyo. Stat. Ann. § 35-1-240(a)(ii). The WDH takes precaution to protect the privacy and security of this information while also making the minimum necessary disclosures to protect public health.

As a general rule, the WDH staff and affiliates may disclose COVID-19 information if the disclosure (1) is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public; and (2) is to a person or persons reasonably able to prevent or lessen the threat, including the target of the threat. See 45 C.F.R. § 164.512(j)(1)(i). The WDH staff and affiliates must make reasonable efforts to limit the information disclosed to the minimum necessary to accomplish the purpose of the disclosure to protect public health. 45 C.F.R. § 164.502(b).

In the school setting, a number of factors are considered on a case-by-case basis to determine whether information may be disclosed. Below are a few examples of factors that may affect whether a disclosure is permissible:

- **K-12 Students**: Children and youth are unable to effectively participate in contact tracing interviews, they cannot reliably determine who they have interacted with at school, and parents are not able to provide this information. The Principal and School Nurse are able to determine other students and staff who may have been exposed to the student and are able to direct sanitization efforts. Therefore, releasing minimal student information to the Principal and School Nurse is permitted and necessary to protect the health of students and staff.

- **College/University Students**: Adult students are able to participate in effective contact tracing interviews. In general, there is no need to contact school administration as the standard contact tracing procedures are sufficient to protect public health.

- **College/University Athletes**: Athletes are in a unique risk group as the nature of participating in sporting events and practices places them in close proximity and contact with other athletes. The Athletic Director or Coach is able to determine other athletes who may have been exposed to a COVID-positive athlete and are able to direct sanitization efforts. Therefore, releasing minimal student information to the Athletic Director or Coach is necessary to protect the health of athletes.

- **Staff**: In general, an employer may not be notified of an employee’s COVID test results unless the employee has signed a HIPAA-compliant authorization form permitting the disclosure. See 45 C.F.R. § 164.512(b)(1)(v). However, the level of risk of exposure to students may make disclosure necessary in order to protect public health. For example, Teachers who work with very young children have a higher likelihood of close contact; therefore, disclosures to the Principal may be necessary in order to determine close contacts and direct sanitization efforts. On the other hand, Professors that are able to maintain social distance in class pose a low risk of further exposure; therefore, disclosure to the employer is not necessary.

- **Online Learning**: Students or staff in the online learning environment that test positive for COVID-19 pose no risk to others in the school setting; therefore, disclosure to school administration is not necessary and not permitted.

- **May identifiable information, such as lists of COVID-19 positive students, be shared with Superintendents?**
In general, no. The WDH should only release de-identified, aggregate, or limited data sets to community leaders, such as Superintendents. However, there may be some situations where disclosure of identifiable information is necessary to prevent or lessen a serious or imminent threat to the health and safety of students and staff. See 45 C.F.R. § 164.512(j)(1)(i). For example, Superintendents may be best situated to assist with contact tracing efforts in the event of COVID positive siblings attending different schools. Disclosure to Superintendents must be approved by the WDH epidemiologists, the disclosure and justification must be documented, and the disclosure must follow the minimum necessary standard.

- Should the identity of students that have been issued a quarantine order be disclosed to school administration?

In general, no. It is the parent's responsibility to notify schools of their child's quarantine order. However, the WDH may disclose quarantine information if necessary to lessen a threat to public health. See 45 C.F.R. § 164.512(j)(1)(i). For example, it may be necessary for WDH to disclose this information if the child could have exposed others at school. Also, it may be necessary to disclose this information if there is a reasonable belief that a parent or guardian may not comply with the quarantine order and continue to send their child to school. A reasonable belief of non-compliance may be demonstrated by statements or actions by the parents. The statements or actions may be explicit (e.g. A parent stating, "My child is going to continue going to school") or implicit (e.g. A parent hanging up on a contact tracing interview or otherwise refusing to participate in the process).

Contact Tracing

Those people considered to be close contacts (close, prolonged contact with the person with COVID-19 as defined above), will be contacted by public health. The public health official will gather the following:

- Basic demographic information
- Current symptoms, if any

Public Health officials will recommend that close contacts get tested for COVID-19 as soon as possible, and then again a week later if the first test was negative.

Public health officials will issue quarantine orders directing the contact to stay home except to seek medical care for 14 days following the last exposure to the person with COVID-19. The quarantine period will last 14 days, even if a person tests negative, because it can take up to 14 days for a person to become sick with COVID-19.

Release from Isolation and Quarantine and Return to School

Once public health officials determine the person with COVID-19 is no longer infectious, he or she will be given a release from isolation letter. The person can return to school and resume normal activities.

Close contacts under quarantine may return to school and resume normal activities once they have completed their 14 day quarantine period if they have not tested positive for COVID-19 or developed any symptoms.

Cleaning and Disinfecting after a Person is Diagnosed with COVID-19

CDC recommends that areas used by the person during their infectious period be closed off to others. Outside doors and windows should be opened to increase air circulation in these areas. If possible, schools should wait 24 hours after the infectious person had been in the area to begin cleaning and disinfecting. However, in the majority of cases, 24 hours will have already passed between the time an infectious person was in the area and a positive test is resulted. All areas (offices,
bathrooms, and common areas) used by the ill persons should be cleaned and disinfected, with focus on frequently touched surfaces. If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection. If at least 7 days have passed since the infectious person was in the area, no additional cleaning measures are needed.

More detailed information about cleaning and disinfecting schools can be found on CDC’s website: Interim Guidance for Child Care Programs and K-12 Schools

**Will a School Have to Close if a Student or Staff Member is Diagnosed with COVID-19?**

Whether a school has to close, as well as the length of any closures, will depend on multiple factors, including but not limited to the number of cases detected within the school, the extent of COVID-19 spread within the community, and the extent to which COVID-19 precautions have been implemented within the school. In most instances, a single case of COVID-19 in a school would not warrant closing the entire school. Short dismissals may be recommended for a school or a segment of the school to allow time to complete the appropriate cleaning and for public health officials to conduct the contact investigation. If there is a significant outbreak within a school, then more extensive closures may be necessary.

Public health officials will provide recommendations to schools on whether a closure is needed and the length of closure needed based on each specific situation. Public health officials will also work with school officials to determine whether a school needs to move into a different tier of operations - for example, move from Tier 1 into Tier 2 according to the Smart Start Guidance.

**More resources from the Centers for Disease Control and Prevention (CDC) for schools and institutes of higher education:**

[School Settings | COVID-19: Colleges and Universities | COVID-19](https://www.cdc.gov)

For more information about the COVID-19 outbreak please visit: [health.wyo.gov](http://health.wyo.gov) or [cdc.gov](http://cdc.gov).