

[EMPLOYER NAME]'s Surveillance Testing Policy

Introduction

In accordance with guidance from the Massachusetts Executive Office of Health and Human Services (“EOHHS”), [EMPLOYER NAME] (“School”) has implemented the following surveillance testing policy to monitor the spread of COVID-19 at the School and identify cases among staff who are asymptomatic or mildly symptomatic in an effort to keep our staff and residents safe. Testing will be conducted on all persons, paid or unpaid, working or volunteering at the School’s facility (“Staff”). Staff does not include persons who work entirely remotely or off-site, or employees who are on leave or otherwise not working at the School’s physical location during the relevant Testing Period or Baseline Period, as applicable. Except under circumstances described below, Staff who have previously tested positive for COVID-19 will not be subject to testing under this policy.

Testing Generally

[Testing under this policy will be offered through a testing provider retained by the School who will be on site [insert times the provider is on site if applicable] at [insert location].]¹ / [Staff will be required to undergo testing at [enter location of facility or “Stop the Spread” provider offering testing] at [a scheduled time/INSERT WHEN TESTING IS EXPECTED] and to provide the School with proof that the Staff member underwent testing during the relevant Testing Period or Baseline Period, as applicable, and the results of that testing when the Staff member receives said results.]

Staff should record on their time sheets the time spent on waiting for and undergoing testing. Under circumstances where testing is required under this policy, Staff may choose, but are not required, requested, pressured, or encouraged by the School, to undergo testing at a separate facility or “Stop the Spread” provider on the Staff member’s personal time. Time spent on such optional testing will not be compensated. If Staff are charged payment for such testing, Staff may submit a request for reimbursement along with proof of payment for the testing. If a member of the Staff chooses to undergo testing at a separate facility or “Stop the Spread” provider, said Staff member must provide the School with proof that testing was conducted during the relevant Testing Period or Baseline Period, as applicable, and Staff member must provide the School with the results of that testing when Staff member receives said results.

Baseline Testing

All Staff who have not previously tested positive for COVID-19 are required to be tested for COVID-19 between August 1 and September 30, 2020 (“Baseline Period”).

¹ Testing locations may be found through this link: <https://www.mass.gov/info-details/covid-19-testing-guidance?auHash=EJehx24ssrGGGPc1JZIBdLzBHRfj5TYus92PRhUDzIs#testing-options-for-entities->

² The Commonwealth’s expectation is that this testing will be arranged by the School ahead of time, preferably through a relationship with a testing center that can be found as per the previous footnote. “Stop the Spread” sites should only be used as needed to supplement a testing relationship with a testing provider.

Commented [A1]: Pick either yellow or green depending on approach and fill in where appropriate

Surveillance Testing Regimen

Following the Baseline Period, Staff may be required to undergo further, periodic COVID-19 testing based on the designation of the facilities location as a “High-Transmission Region” or “Low-Transmission Region,” per EOHHS guidance, at the start of the Testing Period. A “Testing Period” is defined as a two-week time from Wednesday at 7:00 a.m. through the second subsequent Wednesday at 6:59 a.m., with the first bi-weekly Testing Period beginning on September 30, 2020.

Under circumstances where the School is determined to be located in a **High-Transmission Region** at the start of any Testing Period, Staff who have not previously tested positive for COVID-19 will be required to undergo testing for COVID-19 during the Testing Period and in each subsequent Testing Period in which the School’s location is determined to be a High-Transmission Region.

Under circumstances where the School is determined to be located in a **Low-Transmission Region** at the start of any Testing Period, Staff are not required to undergo surveillance testing except as provided below.

Testing Following New Positive COVID-19 Cases in Residents or Staff

Staff who have not previously tested positive for COVID-19 will be required to undergo testing if exposed to or showing symptoms consistent with COVID-19.

If a positive case of COVID-19 is identified at any point during either the Baseline Period or any of the Testing Periods, the School will require Staff to undergo additional testing. Under such circumstances, [all Staff who have not previously tested positive for COVID-19 and who have not been tested in the 7 days preceding the reported positive case] [all Staff in the unit with the identified positive case who have not previously tested positive for COVID-19 and who have not been tested in the past 7 days] will be required to undergo testing for COVID-19.

Staff with Previously Positive COVID-19 Tests

Staff who previously tested positive for COVID-19 may be required to undergo retesting in accordance with the above policy under the following circumstances:

1. If the Staff member develops clinically compatible symptoms of COVID-19 and it has been more than six (6) weeks past the Staff member’s release from isolation; or
2. If the Staff member came into close contact with a confirmed positive case of COVID-19 and it has been more than ninety (90) days since the Staff member’s release from isolation.

If you have any questions or concerns about this policy, please contact [INSERT NAME and TITLE] at [EMAIL/PHONE NUMBER].

Commented [A2]: Choose yellow highlight if location has fewer than 20 residents and all residents share physical space or mutual staff.

Choose green highlight if location has 20 or more residents and residents are separated into distinct units which do not share physical space or mutual staff.