

COVID-19: CDC Issues Interim Guidance For Colleges and Universities

March 10, 2020

The Centers for Disease Control and Prevention (CDC) has issued an interim guidance for administrators of institutions of higher education (IHE) to plan, prepare, and respond to the impact of the Coronavirus Disease 19 (COVID-19).

Administrators of IHE in communities where cases of COVID-19 have not been identified should **plan and prepare** for possible community transmission and outbreaks. The CDC suggests the IHE administrators to take the following steps to help slow the spread of respiratory infectious diseases, including COVID-19:

- Review, update, and implement emergency operations plans, focusing on components that address infectious disease outbreaks.
- Encourage students, staff, and faculty to promote everyday preventative health behaviors on campus.
- Utilize institutional information systems and develop communication-sharing channels with partners, particularly local health officials, to detect and respond to an outbreak.
- Monitor and plan for absenteeism.
- Establish procedures for students, staff, and faculty who are sick on campus.
- Prepare health clinics for COVID-19.
- Perform routine environmental cleaning.
- Create plans to communicate accurate and timely information to the IHE community.
- Review CDC guidance for businesses and employers.
- Coordinate with local health officials to share COVID-19 information resources with students, staff and faculty.

Administrators of IHE in communities where cases of COVID-19 have been detected need to take additional steps to **respond** in order to prevent further spread. Among others:

- IHE should work closely with local health officials and IHE's university system and partners in determine if, when, and for how long classes, events, and activities may be suspended, postponed, or canceled.
- If a student, staff, or faculty member active on campus is infected with COVID-19, IHE should also collaborate with local health departments and other relevant leadership to communicate the possible COVID-19 exposure, while maintaining confidentiality as required by the Americans with Disabilities Act and the Family Education Rights and Privacy Act. Additionally, IHE should seek guidance from local health officials to determine when the student, staff, or faculty member should return to campus and what additional steps are needed to be taken.
- If classes are suspended, IHE should take measures to ensure continuity of education and research, safe housing, and meal programs. IHE should also consider temporarily cancelling extracurricular group activities and large events and discourage students, staff, and faculty from gathering or socializing anywhere. Additionally, IHE should contemplate whether other support services on campus should be modified, scaled back, or stopped.
- IHE should take actions to help counter stigma and promote resilience on campus, such as communicating facts about COVID-19, speaking out against negative behaviors, developing supporting plans for IHE community, and

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ensure continuity of mental health services.

Administrators of IHE with students participating in **international travel or study abroad programs** should:

- Consider postponing or canceling student international travel programs. IHE choosing to maintain programs abroad should evaluate the risks and take appropriate proactive measures.
- Consider asking current program participants to return to their home country. However, IHE should be sensitive to the unpredictable circumstances, travel restrictions, and challenges facing the students in returning home and accessing health care while abroad.
- Consider asking students participating in study abroad programs to return to the United States. In so doing, IHE should work with state and local public health officials to determine the best approach for when and how the study abroad students can return and be protected from stigma and discrimination.

FAQs are also available for IHE administrators in taking measures to protect students, staff, and faculty members from COVID-19 as well as to prevent or slow down the spread in the community.

In light of the increasingly alarming spread of COVID-19 in the United States, employers and businesses need to be prepared for the potential COVID-19 pandemic. Employers and businesses should consult the CDC's interim guidance for businesses and employers and review our recent **e-alert** addressing legal considerations for employers in preparing for and responding to COVID-19.

We will continue to monitor and provide updated guidance concerning the fluctuating situation of COVID-19. If you have any questions, please feel free to contact the authors or your Miller Canfield attorney.

This information is based on the facts and guidance available at the time of publication, and may be subject to change.