

ACHA's Updated Guidance on COVID-19 Management on Campus

January 25, 2022

On January 19, 2022, the American College Health Association (“ACHA”) released [Updated Guidance on COVID-19 Management on Campus](#) (“Updated Guidance”) for institutions of higher education. The Updated Guidance supplements the [ACHA Considerations](#) released on December 6, 2021, and addresses the [guidance released on December 27, 2021 by the CDC](#) shortening isolation and quarantine periods.

The Updated Guidance includes recommendations on the following key considerations:

Vaccinations and Boosters

The Updated Guidance states that “ACHA recommends that [institutions of higher education] require COVID-19 vaccination for all on-campus college students” and “that all eligible students, faculty and staff receive COVID-19 booster doses.” In addition, the Updated Guidance recommends that campuses update their policies and recommendations according to the [new CDC guidance](#) for individuals vaccinated with WHO-approved vaccines. Campuses not requiring vaccination should continue to implement strategies to increase vaccinations and boosters.

Testing

The Updated Guidance states that, if possible, testing should include pre-arrival, on-arrival, and surveillance testing. At a minimum, symptomatic students should be tested with the next priority being close contacts. The Updated Guidance says that PCR and FDA-approved rapid tests are acceptable types of COVID-19 tests.

Masks

The types of masks that should be used and distributed are N95, KN95, or ASTM-rated surgical masks. Campuses should promote the use of the masks listed above and the proper way to wear them. If there are limited resources, the next best option is double masking, as described by the CDC.

Contact Tracing

Because contact tracing by college health staff may no longer be feasible, students should be encouraged to inform their close contacts and advise close contacts to contact health services. Technology other than phone

calls can be used for contact tracing, such as emails or text messages.

Isolation

The Updated Guidance provides that schools may implement either protocols for isolation based on the CDC's general guidance (five days) or congregate setting guidance (ten days). The Updated Guidance recommends that campuses following the ten-day isolation guidance for congregate settings should follow the [CDC's guidance](#) for Isolation in High-Risk Congregate Settings, which includes a 10-day quarantine regardless of vaccination and booster status.

The Updated Guidance recommends the following for schools following the five day-isolation period:

- Students test out of isolation using an antigen test at least five days after the onset of symptoms. If a test is positive, the student should test again on day seven or eight.
- If a college does not require students to test out of isolation, students should only leave isolation if they are asymptomatic or have symptom resolution.
- Any student leaving isolation before day 10 should be provided with and instructed on appropriate use of a well-fitted face mask to be worn in public indoor settings and crowded out-door settings without distancing. Otherwise, continuation of a ten-day isolation period should be strongly considered.

The Updated Guidance provides further considerations where isolation space is limited, as well as for communal restrooms.

Quarantine

ACHA recommends that institutions contemplating a shortened quarantine period consider vaccination status and individual risk factors. Furthermore, all exposed individuals "should monitor for symptoms and wear a well-fitted N95, KN95, or surgical mask for 10 days." An exposed individual that develops symptoms should isolate and get tested.

The Updated Guidelines recommend the following for close contacts who are up to date on COVID-19 vaccination (meaning the person has received all recommended COVID-19 vaccines, including any booster dose(s) when eligible):

- If asymptomatic, such individuals need not quarantine, but should be instructed on proper mask wearing and to monitor symptoms for 10 days.
- Such individuals should seek testing on day five or any time upon the onset of symptoms.

The Updated Guidelines recommends the following for close contacts who are not up to date on COVID-19 vaccination:

- Such individuals should quarantine for at least five days. An individual may leave quarantine after day five if the individual is asymptomatic and receives a negative NAAT or rapid antigen test. The individual should be instructed on proper mask wearing and to monitor symptoms for 10 days.
- ACHA recommends that if an individual cannot comply with mask recommendations, 10 days of quarantine should be strongly considered.

Close contacts who had COVID-19 in the past 90 days need not quarantine or get tested unless they develop symptoms.

Other Key Considerations

The Updated Guidance also provides recommendations regarding public health partnerships, ventilation, and students at high risk. The Updated Guidance emphasizes partnerships between institutions of higher education and local, state, territorial, or tribal jurisdictions regarding guidance and requirements related to COVID-19 management strategies. ACHA recommends colleges implement strategies to ventilate and filter indoor spaces, such as opening windows and portable HEPA filters. In addition, ACHA recommends that students at high risk consult with health services or private health care providers regarding best strategies and accommodations offered by the institution.

Please refer directly to the [Updated Guidance](#) for more information.

If you have questions regarding any implications of this Updated Guidance and its potential effect on your higher education institution, feel free to contact James G. Ryan at (516) 357-3750 or jryan@cullenllp.com, Jennifer A. McLaughlin at (516) 357-3889 or jmclaughlin@cullenllp.com, Jennifer E. Seeba at (516) 296-9173 or jseeba@cullenllp.com, or Kevin P. McDonough at (516) 357-3787 or kmcdonough@cullenllp.com.

Thank you to Taylor Gorman for her assistance with this client alert.

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