

Yale COVID-19 Campus Health & Safety Program - Privacy Practices

Yale has implemented a COVID-19 Campus Health & Safety Program (Program) to protect students, faculty and staff returning to campus. Under the Program, individuals returning to campus are required to comply with measures that may include daily health checks, training, routine testing, contact tracing, quarantine, isolation, and vaccination (see <https://covid19.yale.edu/>). Records related to completion of these measures will be collected and maintained to manage the program and meet state requirements. This document describes the steps the University will take to protect the privacy of Program information while ensuring the health and safety of the Yale community.

What personal information is collected and why?

Personal information is collected in the course of completing your requirements to return to campus including:

- Daily Health Check:
The Daily Health Check collects your response as to whether or not you are experiencing any COVID-19 symptoms, whether you plan to come to campus, and your Net ID. The survey does not collect individual symptoms, only a response as to whether you have had any of a list of symptoms. This information is collected to monitor the number of people expected on campus and the overall incidence of COVID-19 symptoms at the University.
- Health and Safety Training:
Completion status of the Health and Safety Training is collected and stored in association with your Net ID. This information is collected to ensure that all faculty, staff, and students have completed required training and are aware of best practices to avoid the spread of COVID-19.
- Asymptomatic screening tests:
Status of scheduling and completing tests is collected for individuals who are required to complete asymptomatic testing, including gateway and recurrent testing. Scheduling data includes your Net ID and whether or not you have scheduled and completed a required test. This information is collected to oversee compliance with required screening testing.

Test results from asymptomatic screening, including students, faculty, and staff with routine testing requirements and anyone who signs up for asymptomatic screening through the Yale COVID-19 Screening Program (<https://covid19.yale.edu/screening>), will be collected along with your name, phone number, and email address. This information is collected to monitor the prevalence of COVID-19 and to follow up on positive test results, including contact tracing and isolation.

- Symptomatic tests:
Students: Positive test results are managed in the same way as asymptomatic tests and as described in the Community Compact.
Faculty and staff: Faculty and staff members who have tested positive outside of Yale's COVID-19 Screening Program are asked to provide a copy of the positive test results to the Campus COVID Resource Line to allow for contact tracing and to ensure isolation of positive cases. Test

results of faculty and staff conducted outside of Yale's COVID-19 Screening Program will be collected only with your explicit authorization.

- Contact tracing:
Contact tracing involves interviewing positive cases to identify individuals who have had significant exposure as defined by the US Centers for Disease Control (CDC). If contacts meets the CDC criteria, their names and phone numbers will be collected. A different contact tracer will reach out to the contacts to notify them of the exposure. Contact tracers will not share the name of the individual with a positive test but rather will provide guidance on the need to quarantine and monitor for symptoms.
- Location Data:
Access to buildings through card swipes may be reviewed in association with an individual's authorization to be on campus or isolation status. Card swipe data includes building access points along with your UPI.
The number of unique individuals connecting to Wifi access points may be reviewed to identify crowds. Identifying the number of individuals requires collection of Net IDs of devices connecting to a given Wifi access point so as to produce an automated count of individuals rather than devices present, after which the Net IDs are removed. The resulting report is limited to the number of individuals at a given location and time.
- Vaccination Status:
Vaccination status of students, faculty, and staff is collected by the University when these individuals are vaccinated through the University vaccination program. In addition, individual members of the Yale community may submit vaccination information to Yale via an on-line form. Vaccine data collected by the University includes your name, Net ID, which vaccine was received, and when each dose was provided. This information is used to monitor compliance with vaccine requirements, and to inform COVID-19 mitigation strategies.

How will personal information be used and who will have access?

Data generated about you through daily health checks, training, testing, contact tracing, and vaccination are stored in databases and combined with information from Workday and Banner, including your phone number and/or email address, campus address, and supervisors.

Personally identifiable information collected for the Program will be used only for activities needed to promote campus safety or as required by law. Yale will use the information collected for the following purposes:

- To monitor campus safety through aggregate reports on compliance, positive test rates, vaccination rates and other measures of public health.
- To monitor compliance with the Yale Community Compact and Statement of Expectations. Reports of individuals who are not in compliance with requirements will be shared as necessary to achieve compliance and may be sent to Yale's Health and Safety Leaders, supervisors, Deans and Heads of residential colleges, Human Resources, and Lead Administrators as appropriate.

On-going non-compliance by students may be reported to the Compact Review Committee for evaluation.

- To meet Connecticut state requirements that Yale maintain documentation of faculty, staff, and student compliance with daily health checks. If authorized or required by law, compliance data may be provided to state and local authorities.
- To alert Deans, Health and Safety Leaders, Heads of residential colleges, and Campus Safety of positive student tests so that they can help students move to isolation housing, manage badge access, assist with academic accommodations, and ensure compliance with isolation requirements.
- To monitor students, faculty, and staff identified as needing to quarantine to ensure campus safety. Reports of individuals subject to quarantine will be provided to Health and Safety Leaders and Lead Administrators who may share this information with Deans, Heads of residential colleges, and supervisors where appropriate.
- To initiate disinfection of Yale facilities following a positive test result. Environmental Health and Safety will be provided phone numbers for individuals who test positive and will contact these individuals to determine locations that require cleaning.
- To perform contact tracing to identify members of the Yale community who are believed to have had meaningful exposure in accordance with CDC guidelines. The contact tracing team will be notified of individuals who test positive through the asymptomatic screening program or who have consented to contact tracing after being tested by their physician.
- To monitor areas where gatherings are estimated to exceed public health density guidelines. Yale Security will be provided reports for investigation and assessment of risk reduction opportunities.
- To manage the data collection systems and to generate reports. Information Technology Services staff who are managing the databases and generating reports will have access to data systems and are required to limit their access to the underlying identified data in accordance with University requirements for student and employee data.
- Vaccination information will be disclosed to your Epic medical record and thereby made available to healthcare providers and to you through the MyChart patient portal.

How do we protect your information?

The databases storing the COVID-19 Campus Safety information are configured in accordance with University requirements for high risk data (see <https://cybersecurity.yale.edu/protectyourdata>). Recipients of individual reports are expected to manage the information as required for moderate risk student and employee data. Information in the databases will be de-identified and/or deleted once the information is no longer needed for the Program.

Changes to this statement

This statement may be updated periodically to reflect changes in the Program or our privacy practices. Updated versions will be posted to this site.

Questions

If you have any questions about privacy, contact privacy@yale.edu. If you have questions about the COVID-19 program, you may contact the Yale Campus COVID Resource Line at 203-432-6604.