



## **NY HERO ACT Airborne Infectious Disease Exposure Prevention Plan**

**July 31, 2021**

The purpose of this plan is to protect Vassar College employees against exposure and disease during an airborne infectious disease outbreak. This plan goes into effect when an airborne infectious disease is designated by the New York State Commissioner of Health as a highly contagious communicable disease that presents a serious risk of harm to the public health. This plan is subject to any additional or greater requirements arising from a declaration of a state of emergency due to an airborne infectious disease, as well as any applicable federal standards.

*Employees should report any questions or concerns with the implementation of this plan to the designated contact.*

This plan applies to all Vassar College “employees” as defined by the New York State HERO Act, which means any person providing labor or services for remuneration for a private entity or business within the state, without regard to an individual’s immigration status, and shall include part-time workers, independent contractors, domestic workers, home care and personal care workers, day laborers, farmworkers and other temporary and seasonal workers. The term also includes individuals working for digital applications or platforms, staffing agencies, contractors or subcontractors on behalf of the employer at any individual work site, as well as any individual delivering goods or transporting people at, to or from the work site on behalf of the employer, regardless of whether delivery or transport is conducted by an individual or entity that would otherwise be deemed an employer under this chapter. The term does not include employees or independent contractors of the state, any political subdivision of the state, a public authority, or any other governmental agency or instrumentality.

Employers and employees should visit the websites of Departments of Health and Labor for up-to-date information on whether a designation has been put into effect, as any such designation will be prominently displayed. No employer is required to put a plan into effect absent such a designation by the Commissioner of Health.

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## I. RESPONSIBILITIES

This plan applies to all employees of Vassar College at 124 Raymond Avenue, Poughkeepsie, NY 12604.

This plan requires commitment to ensure compliance with all plan elements aimed at preventing the spread of infectious disease. The following supervisory employee(s) are designated to enforce compliance with the plan. Additionally, these supervisory employees will act as the designated contacts, unless otherwise noted in this plan:

- James Kelly, Director of Environmental, Health and Safety. Facilities Operations. (845) 437-5685.

## II. EXPOSURE CONTROLS DURING A DESIGNATED OUTBREAK

### A. MINIMUM CONTROLS DURING AN OUTBREAK

During an airborne infectious disease outbreak, the following minimum controls will be used in all areas of the worksite:

1. General Awareness: Individuals may not be aware that they have the infectious disease and can spread it to others. Employees should remember to:
  - Maintain physical distancing;
  - Exercise coughing/sneezing etiquette;
  - Wear face coverings, gloves, and personal protective equipment (PPE), as appropriate;
  - Limit what they touch;
  - Stop social etiquette behaviors such as hugging and hand shaking, and
  - Wash hands properly and often.
2. “Stay at Home Policy”: If an employee develops symptoms of the infectious disease, the employee should not be in the workplace. The employee should inform their supervisor, contact Vassar Health Services, and follow New York State Department of Health (NYSDOH) and Centers for Disease Control and Prevention (CDC) guidance regarding obtaining medical care and isolating.
3. Health Screening: An employee showing signs or symptoms of the infectious disease should be removed from the workplace and should contact a healthcare professional for instructions. If health screening is required by CDC and/or NYS DOH, , Vassar will implement a compliant process consistent with NYSDOH and CDC guidance.

4. Face Coverings: Employees will wear face coverings throughout the workday as appropriate for the conditions and advised by NYSDOH and CDC or other appropriate health agency. Face coverings and physical distancing should be used together whenever possible. The face covering must cover the nose and mouth, and fit snugly, but comfortably, against the face. The face covering itself must not create a hazard, e.g. have features could get caught in machinery or cause severe fogging of eyewear. The face coverings must be kept clean, sanitary and must be changed when soiled, contaminated, or damaged.
5. Physical Distancing: Physical distancing will be followed as much as feasible. Avoid unnecessary gatherings and maintain a distance of at least six feet (or as recommended by the NYSDOH/CDC for the infectious agent) from each other. Use a face covering when physical distance cannot be maintained.

Vassar College may implement any or all of these additional controls, in various campus spaces, depending on the situation:

- restricting or limiting customer or visitor entry;
  - limiting occupancy;
  - allowing only one person at a time inside small enclosed spaces with poor ventilation;
  - reconfiguring workspaces;
  - physical barriers;
  - signage;
  - floor markings;
  - telecommuting;
  - remote meetings;
  - preventing gatherings;
  - restricting travel;
  - creating new work shifts and/or staggering work hours;
  - adjusting break times and lunch periods;
  - delivering services remotely or through curbside pickup;
6. Hand Hygiene: To prevent the spread of infection, employees should wash hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol to clean hands, BEFORE and AFTER the following:
    - Touching your eyes, nose, or mouth;
    - Touching your mask;
    - Entering and leaving a public place; and
    - Touching an item or surface that may be frequently touched by other people, such as door handles, tables, chair backs, restroom handles, stair railings, gas pump handles, computer keyboards/screens.Because hand sanitizers are less effective on soiled hands, wash hands rather than using hand sanitizer when your hands are soiled.
  7. Cleaning and Disinfection: See Section V of this plan.
  8. “Respiratory Etiquette”: Because infectious diseases can be spread by droplets expelled from the mouth and nose, employees should exercise appropriate respiratory etiquette by covering nose and mouth when sneezing, coughing or yawning.

9. Special Accommodations for Individuals with Added Risk Factors: Some employees may be at increased risk of severe illness, if infected. Please inform the Human Resources department if you fall within this group and need an accommodation.

## B. ADVANCED CONTROLS DURING AN OUTBREAK

For activities, where the Minimum Controls alone may not provide sufficient protection for employees, additional controls from the hierarchy listed below, may be used. Vassar College will evaluate the following and may implement, if the additional controls are necessary and feasible:

- Elimination
  - Engineering Controls
  - Administrative Controls
  - Personal Protective Equipment
1. Elimination: Consider the temporary suspension or elimination of high-risk activities where adequate controls may not provide sufficient protection for employees.
  2. Engineering Controls: Consider appropriate controls to contain and/or remove the infectious agent, prevent the agent from being spread, or isolate the worker from the infectious agent. Examples of engineering controls, may include:
    - Mechanical Ventilation: Local exhaust and general ventilation, following ASHRAE guidance on the possible use of increased fresh air makeup, use of high efficiency air filters (consistent with equipment design and capabilities).
    - Natural Ventilation: Opening windows/doors for natural cross ventilation and possibly use window fans to exhaust air from the space.
    - Install cleanable barriers such as partitions and/or clear plastic sneeze/cough guards.
    - Change layout to avoid points or areas where employees may congregate.
  3. “Administrative Controls” are policies and work rules used to prevent exposure. Vassar College may implement some or all of these administrative controls. Examples include:
    - Increasing the physical space between workers;
    - Disinfecting procedures for specific operations;
    - Employee training;
    - Identify and prioritize job functions that are essential for continuous operations;
    - Cross-train employees to ensure critical operations can continue during worker absence;
    - Limit the use of shared workstations;
    - Post signs reminding employees of respiratory etiquette, masks, handwashing;
    - Rearrange traffic flow to allow for one-way walking paths;
    - Provide clearly designated entrance and exits;
    - Provide additional short breaks for handwashing and cleaning;
    - Establishing pods or cohorts working on same shift;

4. Personal Protective Equipment (PPE) is equipment that protects employees from hazards, for example, eye protection, face shields, respirators, and gloves that can help protect the wearer from infection. Required PPE will be provided by Vassar at no cost to the employee. The employee must use the PPE in the manner intended and maintain it, in a sanitary and reliable condition.

PPE provided to an employee will be based on a hazard assessment for the workplace. Employees must use all PPE in compliance with all state or federal regulatory requirements.

### C. EXPOSURE CONTROL READINESS, MAINTENANCE AND STORAGE:

The controls we have selected will be obtained, properly stored, and maintained, so that they are ready for immediate use, in the event of an infectious disease outbreak and any applicable expiration dates will be properly considered.

## III. HOUSEKEEPING DURING A DESIGNATED OUTBREAK

### A. Disinfection Methods and Schedules

Objects that are touched repeatedly by multiple individuals, such as door handles, light switches, control buttons/levers, dials, levers, water faucet handles, computers, phones, or handrails must be cleaned frequently with an appropriate disinfectant. Surfaces that are handled less often, or by fewer individuals, may require less frequent disinfection. The disinfection methods and schedules selected are based on specific workplace conditions.

The New York State Department of Environmental Conservation (NYSDEC) and the Environmental Protection Agency (EPA) have published lists of approved disinfectants that are effective against many infectious agents (see [dec.ny.gov](http://dec.ny.gov) and [epa.gov/pesticide-registration/selected-epa-registered-disinfectants](http://epa.gov/pesticide-registration/selected-epa-registered-disinfectants)). Select disinfectants based on NYSDOH and CDC guidance and follow manufacturer guidance for methods, dilution, use, and contact time.

### B. Adjustments to Normal Housekeeping Procedures

Normal housekeeping duties and schedules should continue to be followed during an infectious disease outbreak, to the extent practicable and appropriate consistent with NYSDOH and/or CDC guidance in effect at the time. However, routine procedures may need to be adjusted and additional cleaning and disinfecting may be required.

Housekeeping staff may be at increased risk because they may be cleaning many potentially contaminated surfaces. Some housekeeping activities, like dry sweeping, vacuuming, and dusting, can resuspend into the air particles that are contaminated with the infectious agent. For that reason, alternative methods and/or increased levels of protection may be needed.

Rather than dusting, for example, the CDC recommends cleaning surfaces with soap and water before disinfecting them. Conducting housekeeping during “off” hours may also reduce other workers’ exposures to the infectious agent. Best practice dictates that housekeepers should wear respiratory protection. See [cdc.gov](http://cdc.gov) for more guidance.

### C. Cleaning of potentially contaminated areas

If an employee develops symptoms of the infectious disease at work, it is ideal to isolate the area in accordance with

guidance issued by NYSDOH or the CDC, before cleaning and disinfecting the sick employee's work area. This delay will allow contaminated droplets to settle out of the air and the space to be ventilated.

#### D. Waste Handling

As feasible, liners should be used in trash containers. Empty the containers often enough to prevent overfilling. Do not forcefully squeeze the air out of the trash bags before tying them closed. Trash containers may contain soiled tissue or face coverings.

### **IV. INFECTION RESPONSE DURING A DESIGNATED OUTBREAK**

If an actual, or suspected, infectious disease case occurs at work, take the following actions:

- Instruct the sick individual to wear a face covering and leave the worksite and follow NYSDOH/CDC guidance.
- Follow local and state authority guidance to inform impacted individuals.

### **V. TRAINING AND INFORMATION DURING A DESIGNATED OUTBREAK**

A. Vassar College Human Resources and Environmental Health and Safety staff will inform all employees by electronic messaging and hand posting of hard copy announcements on employee bulletin boards of the existence and location of this Plan,, the circumstances it can be activated, the infectious disease standard, employer policies, and employee rights under the HERO Act. (Note: training need not be provided to the following individuals: any individuals working for staffing agencies, contractors or subcontractors on behalf of the employer at any individual work site, as well as any individual delivering goods or transporting people at, to or from the work site on behalf of the employer, where delivery or transport is conducted by an individual or entity that would otherwise be deemed an employer under this chapter)

B. When activated, all personnel will receive training, organized by Environmental Health and Safety and Health Services staff, which will cover all elements of this plan and the following topics:

- The infectious agent and the disease(s) it can cause;
- The signs and symptoms of the disease;
- How the disease can be spread;
- An explanation of this Exposure Prevention Plan;
- The activities and locations at our worksite that may involve exposure to the infectious agent;
- The use and limitations of exposure controls
- A review of the standard, including employee rights provided under Labor Law, Section 218-B.

C. The training will be:

- Provided at no cost to employees and will be scheduled during working hours. If training during normal work hours is not possible, employees will be compensated for the training time (with pay or time off );
- Appropriate in content and vocabulary to your educational level, literacy, and preferred language; and
- Verbally provided in person or through telephonic, electronic, or other means.

## VI. PLAN EVALUATIONS DURING A DESIGNATED OUTBREAK

The employer will review and revise the plan periodically, upon activation of the plan, and as often as needed to keep up-to-date with current requirements. Document the plan revisions below:

[illegible]



## VII. RETALIATION PROTECTIONS AND REPORTING OF ANY VIOLATIONS

No employer, or his or her agent, or person acting as or on behalf of a hiring entity, or the officer or agent of any entity, business, corporation, partnership, or limited liability company, shall discriminate, threaten, retaliate against, or take adverse action against any employee for exercising their rights under this plan, including reporting conduct the employee reasonably believes in good faith violates the plan or airborne infectious disease concerns to their employer, government agencies or officials or for refusing to work where an employee reasonably believes in good faith that such work exposes him or her, other workers, or the public to an unreasonable risk of exposure, provided the employee, another employee, or representative has notified the employer verbally or in writing, including electronic communication, of the inconsistent working conditions and the employer's failure to cure or if the employer knew or should have known of the consistent working conditions.

Notification of a violation by an employee may be made verbally or in writing, and without limitation to format including electronic communications. To the extent that communications between the employer and employee regarding a potential risk of exposure are in writing, they shall be maintained by the employer for two years after the conclusion of the designation of a high risk disease from the Commissioner of Health, or two years after the conclusion of the Governor's emergency declaration of a high risk disease. The employer should include contact information to report violations of this plan and retaliation during regular business hours and for weekends/other non-regular business hours when employees may be working.