



University of Vermont
SARS CoV-2 EXPOSURE CONTROL PLAN FOR
FACILITIES PERSONNEL
August 2020 - Version 2

Date	Edits	New Version No.
8/12/20	Aligning procedures with UVM Strong recommendations for a safe reopening of campus Narrowing scope of document to facilities personnel	Version 2

UVM SARS CoV-2 PREPAREDNESS AND RESPONSE PLAN

PURPOSE & APPLICABILITY

The purpose of this Plan is to establish uniform guidance for UVM facilities and maintenance and custodial activities where there is increased risk of exposure to the SARS CoV-2 virus that causes COVID-19. This plan applies to employees working in maintenance and custodial roles in the following UVM departments: Physical Plant, Custodial Services, Residential Life, and Athletics.

DEFINITIONS

Close Contact is defined as:

- Being within about 6 feet or 2 meters of a COVID-19 case for a prolonged period (more than 15 minutes). Close contact can occur while caring for, living with, visiting, or sharing a healthcare waiting area or room with a COVID-19 case.

OR

- Having direct contact with infectious secretions of a COVID-19 case (example: being coughed on or sharing eating utensils with someone infected with COVID-19.)

COVID-19 stands for Coronavirus Disease 2019. COVID-19 is the respiratory disease caused by the SARS CoV-2 virus.

Isolation is similar to quarantine but used for people who are sick and have symptoms. These individuals are either confirmed cases of COVID-19 based on testing results or presumed to be positive for COVID-19 based on assessment from a healthcare provider. Individuals in isolation are instructed to stay on one area away from others to stop the spread of the virus. People remain in isolation based on assessment from their healthcare provider and the latest Centers for Disease Control and Prevention (CDC) and Vermont Department of Health recommendations.

Quarantine is for healthy, asymptomatic individuals who had close contact to someone with COVID-19. Quarantine means staying in one location away from others for the purpose of observing and monitoring your health status for the potential development of COVID-19 symptoms. The quarantine time is based on the disease's incubation period. The quarantine period of COVID-19 is 14 days, or as directed by a healthcare provider. Someone in quarantine may also be tested for COVID-19 after day 7 of quarantine, and can end quarantine upon receiving a negative COVID-19 test result. After being released from quarantine, individuals pose no exposure risk to the public.

Arrival Quarantine applies to students who have to quarantine when they arrive on UVM campus for the Fall 2020 semester based on [Vermont's Cross State Travel Criteria](#). Students in arrival quarantine will be housed in one residence hall. Students will be tested for COVID-19 on day 7 of quarantine and will be permitted to move into their permanent room assignment after they receive a negative test result.

BACKGROUND INFORMATION

The best way to control a hazard in the workplace is to eliminate the hazard. However, during a COVID-19 outbreak, it may not be possible to eliminate the hazard, therefore controls that reduce and minimize a worker's exposure to the hazard must be implemented based on a hierarchy from most effective to least effective: Engineering Controls, Safe Work Practices, Administrative Controls, and Personal Protective Equipment (PPE). When used correctly, PPE can minimize a worker's exposure, but PPE should not take the place of other more effective workplace controls.

Certain individuals may have underlying health conditions (example: older age, chronic medical conditions, immunocompromising conditions etc.) that put them at increased risk of complications related to COVID-19. Employees should discuss these concerns with their healthcare provider and supervisors.

BASIC INFECTION CONTROL REQUIREMENTS FOR ALL UVM EMPLOYEES

In accordance with Governor's Scott Work Safe Order and the Vermont Occupational Safety and Health Administration (VOSHA), UVM has implemented a comprehensive, phased approach to reopening campus for employees and students and resuming on-campus operations. Each department or unit must have a written resumption of operations plan describing how they will comply with the COVID-19 infection control procedures to be approved by the UVM Strong Health and Safety Committee and the Vice President for Operations and Public Safety. In addition, all UVM employees must complete a COVID-19 awareness training before they may return to campus.

These requirements are subject to change based on COVID-19 activity in Vermont and Statewide health and safety mandates. For the latest information on COVID-19 requirements at UVM please see:

<https://www.uvm.edu/returntocampus>

Supervisors will be responsible for ensuring their employees have completed the COVID-19 required training and are following the infection control measures in their individual units or divisions.

Supervisors will have the support of the UVM COVID-19 Health Officer in carrying out these duties.

DEVELOPMENT OF JOB SPECIFIC JOB HAZARD ANALYSIS

This document (including Appendix A) should be utilized to amend or create a job hazard analysis (JHA) for specific tasks to be completed by UVM facilities personnel to reduce occupational risk of COVID-19. Job/activity type, campus location and the minimum levels of personal protective equipment are outlined in Appendix A, however engineering controls, administrative controls and work practice controls will vary depending on the nature of the job. Additionally, PPE may be required for other hazards (such as electrical hazards, etc.) pursuant to a JHA. Appendix A can be found online at: temporary DAC (the all access pass) access. https://www.uvm.edu/sites/default/files/Physical-Plant-Department/Copy_of_Copy_of_AppendixA_Aug_11_2020_PPE_for_UVM_TasksSpring2020.pdf

1. DETERMINE LEVEL OF RISK

The Occupational Safety and Health Administration (OSHA) has published guidelines (Guidance on Preparing Workplaces for COVID-19, OSHA document 3990-03 2020) for employees on classifying employees into different risk groups for exposure to the coronavirus.

The OSHA Guidance document can be found at: <https://www.osha.gov/Publications/OSHA3990.pdf>.

[Appendix A](#) of this Plan contains a list of common tasks completed by UVM facilities and maintenance personnel and these tasks have been assigned PPE based on the OSHA Guidance and input from UVM Risk Management, UVM Training & Compliance Office (TCO) and UVM Student Health Services.

The OSHA Guidance provides four different risk categories, as follows.

- Very high exposure risk jobs are those with high potential for exposure to known or presumed sources of COVID-19 during specific medical or laboratory procedures. UVM facilities and maintenance employees are not anticipated to perform any very high-risk jobs.
- High exposure risk jobs are those with high potential for exposure to known or presumed sources of COVID-19. UVM facilities and maintenance employees in this category can include:
 - Any UVM personnel completing an *emergency* maintenance procedure in an isolation dorm room, or quarantine dorm rooms or suites.
 - Any UVM personnel completing an *emergency* maintenance procedure in a COVID-19 surge space located on UVM property.
- Medium exposure risk jobs include those that require the potential for, or frequent and/or close contact with (i.e., within 6 feet of) the general public in high-population-density work environments. UVM facilities and maintenance employees in this category can include:
 - UVM personnel performing routine maintenance and cleaning in public common areas of the arrival quarantine residence hall.
 - UVM personnel providing services in dorm rooms or suites under normal occupancy where there are no COVID-19 positive students currently living.
 - UVM personnel providing services in academic, administrative or laboratory buildings under normal occupancy where there are no positive COVID-19 occupants.
 - UVM personnel providing services to athletic facilities or other high occupancy UVM building where there are no positive COVID-19 occupants.
- Lower exposure risk jobs are those that do not require contact with people known to be, or suspected of having COVID-19, nor frequent close contact with (i.e., within 6 feet of for more than 15 minutes) the general public, including co-workers and students. Employees in this category have minimal occupational contact with the public and other coworkers. UVM facilities and maintenance employees in this category can include:
 - Managers and/or Supervisors performing routine tours or inspections of residence halls under normal operations where there are no COVID-19 positive students.
 - UVM personnel providing services to athletic facilities or other UVM buildings at times when students or employees are not occupying the space.
 - Outdoor work performed where no close contact occurs with coworkers, students, staff or pedestrians.

2. EMPLOY THE ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PPE APPROPRIATE TO RISK LEVEL

LOW RISK

- Engineering Controls
 - Additional engineering controls are not recommended for workers in the lower exposure risk group.
 - Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.
- Administrative Controls:
 - Complete required training on COVID-19 and ways to prevent occupational exposures.
 - Implement the Basic Infection Control requirements outlined by UVM Strong Reopening Guidelines and the department or unit's approved Resumption of On-Campus Operations Plan
- PPE
 - PPE level 4 or 5, pursuant to Appendix A.
 - Any employee issued PPE for their normal job duties pursuant to a JHA should continue using it as trained.

MEDIUM RISK

- Engineering Controls
 - Provide services, whenever feasible, during times of low building occupancy, or when there are no students or employees present.
 - In residence halls, have the student wait outside their room or temporarily close off bathrooms while performing work.
- Administrative Controls
 - Complete required training on COVID-19 and ways to prevent occupational exposures.
 - Implement the Basic Infection Control requirements outlined by UVM Strong Reopening Guidelines and the department or unit's approved Resumption of On-Campus Operations Plan
- Personal Protective Equipment
 - Medium risk PPE level 3 pursuant to Appendix A.
 - Additional PPE for Medium Risk activities may be needed, depending on a hazard assessment performed by the supervisor that will take into account the work task being performed, feasibility of engineering or administrative controls, any sharing of necessary equipment or tools, and proximity to members of the public, students, or co-workers.
 - Rarely do medium-risk employees need respirators. Some exceptions might be an activity that requires an employee to be within close contact of a co-workers or students for an extended amount of time (for example, fit testing)
 - Any employee issued PPE for their normal job duties pursuant to a JHA should continue using it as trained.

HIGH RISK:

- Engineering Controls
 - Isolate symptomatic students with confirmed or presumed COVID-19 in a designated residence hall.
 - Symptomatic employees or employees with a positive COVID-19 test result shall not report to, or be allowed to remain at, work.
- Administrative Controls:
 - Complete required training on COVID-19 and ways to prevent occupational exposures.
 - Implement the Basic Infection Control requirements outlined by UVM Strong Reopening Guidelines and the department or unit's approved Resumption of On-Campus Operations Plan
 - To the extent possible, a positive COVID-19 should remain outside the room during emergency service.
 - Ensure that psychological and behavioral support is available to address employee stress.
 - Minimize the number of employees who enter a student's isolation or quarantine dorm room or suite to only those employees who provide a *necessary or emergency service*:
 - Students in isolation or quarantine should perform basic cleaning of their own dorm and suite, and organize their own trash/recycling for removal
 - All routine/non-emergency services and cleaning in isolation areas, including dorm rooms, suites, hallways, public common areas, and bathrooms, should be suspended until 24 hours after a final cleaning has been performed by an outside contractor.
 - All routine/non-emergency services and cleaning in individual quarantine dorm rooms or suites should be suspended until after students have been moved to their permanent residence. Any student who tests positive for COVID-19 will have their room cleaned by an outside contractor.
- Personal Protective Equipment:
 - Employees performing high risk activities must wear PPE level 2 pursuant to Appendix A.
 - Any employee issued PPE for their normal job duties pursuant to a JHA should continue using it as trained.

3. REQUIRED TRAINING

All employees are required to complete UVM's COVID-19 online training prior to coming back to work on campus. This training addresses signs and symptoms of COVID-19 and how it is spread, information on social distancing, cleaning requirements, and infection control requirements at UVM, and the types and proper use of any PPE that may be required including storage, maintenance, and disposal. This training is documented by the employee's supervisor through PeopleSoft.

If an employee is required to wear PPE on the job, they must receive training on that PPE. Before putting workers in PPE they must receive training. Training must be documented. Training must be made

available to the employee in a language they can understand. As part of training employees will need to know:

- How the PPE should fit
- Where and when to use it
- How to inspect it and replace defective PPE
- How to put on and take off PPE
- How to dispose of PPE
- Limitations of PPE

Any employee who is required to wear a respirator, including a disposable N95, must enroll in UVM's Respiratory Protection Program, which requires successful completion of the following steps:

- Fill out a medical questionnaire of their health history that UVM sends to a healthcare provider for review
- Receive medical clearance from UVM's healthcare provider confirming they fit to wear a respirator
- Pass a fit test for the respirator they will be wearing
- Receive training on how to wear the respirator properly, how to put it on and take it off, and perform a seal check.

4. WASTE DISPOSAL

PPE and other waste generated during *high risk* tasks should be treated as regulated medical waste and disposal should be coordinated with UVM Risk Management. Waste from medium and low risk tasks shall be treated as regular construction and debris (C & D) waste. Refer to [Appendix A](#) for further details.

5. REFERENCES

UVM Links

- UVM Return to Campus Updates: <https://www.uvm.edu/returntocampus>
- Appendix A: COVID-19 PPE Matrix for UVM Job Tasks: https://www.uvm.edu/sites/default/files/Physical-Plant-Department/AppendixA_PPE_for_UVM_TasksSpring2020.04.08.2020.pdf
- More information about PPE at UVM: <https://www.uvm.edu/riskmanagement/personal-protective-equipment>
- Overview of UVM's Respiratory Protection Program: <https://www.uvm.edu/riskmanagement/respiratory-protection>
- UVM written Respiratory Protection Program: https://www.uvm.edu/sites/default/files/UVM-Risk-Management-and-Safety/UVM_Written_Respiratory_Protection_Program_-_2020.pdf
- UVM Biowaste Program: <https://www.uvm.edu/riskmanagement/biowaste-management>