University of Rochester – NY HERO ACT
AIRBORNE INFECTIOUS DISEASE EXPOSURE PREVENTION PLAN

Currently in effect for Covid-19

The purpose of this plan is to protect 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 listed in Section I of this plan.

NOTE: University of Rochester (UR) employees that work in healthcare settings are currently covered under the Covid-19 Exposure Prevention Plan required by the OSHA Emergency Temporary Standard (ETS), which is available on PolicyStat.

The Hero Act Airborne Infectious Disease Exposure Prevention Plan applies to all other UR employees not covered by the OSHA ETS plan including but not limited to River Campus, South Campus, Laboratory for Laser Energetics (LLE), Eastman School of Music (ESM), and Memorial Art Gallery (MAG) as defined by the New York State HERO Act.

The NYS Department of Labor has enacted the Hero Act due to high community spread of Covid-19, which is now in effect as of 9/7/2021. Covid-19 Response has been implemented at UR since March 2020 and continually adapted to meet ever-changing Covid guidelines. The UR Covid Resource Center provides all employees access to the most current information regarding Covid vaccination requirements, safety plans, visitor policies and updates.

UR has been working diligently since March 2020 to prevent Covid-19 outbreaks on-site. UR is now requiring:

- Vaccination for all employees, with limited exemption options.
- Face masks at all times indoors, unless eating or alone in personal office.
- Physical distancing as feasible.
- Employees to complete the Dr. Chat Bot daily health screening prior to working on-site each day.
- High touch areas to be disinfected daily by Environmental Services personnel.
- Hand sanitizing stations be available inside building entrances and its use is encouraged.
- Covid-19 signage be displayed to remind employees to mask, use proper hand hygiene, etc.
- Covid-19 Safety Training for all employees available on the MyPath learning platform.
I. Site Contacts and Responsibilities

*Site Contacts:* This plan applies to all employees of University of Rochester, except those working in healthcare settings (Healthcare employees covered by OSHA ETS written plan in PolicyStat).

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Location</th>
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<tbody>
<tr>
<td>Dave Bujak</td>
<td>Emergency Preparedness Manager</td>
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<td>353-4700</td>
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<td>Mark Cavanaugh</td>
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<td>Mike Liberty</td>
<td>Assistant Director EH&amp;S</td>
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<td>Barry McHugh</td>
<td>Assistant Director of Facilities Operations</td>
<td>River Campus</td>
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<tr>
<td>Kelly Kuczynski</td>
<td>Occupational Health Nurse Leader</td>
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<tr>
<td>Karen Cera</td>
<td>Safety Officer</td>
<td>LLE</td>
<td>275-9213</td>
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<tr>
<td>Mike Zavaglia</td>
<td>Dir ESM Facilities &amp; Auxiliary Operations</td>
<td>ESM</td>
<td>274-1171</td>
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<tr>
<td>Patti Giordano</td>
<td>COO/Deputy Director</td>
<td>MAG</td>
<td>276-8932</td>
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*Responsibilities:* All department managers are responsible for ensuring their employees are compliant with the Exposure Prevention Plan. Mark Cavanaugh is responsible for ensuring UR has a written Exposure Prevention Plan compliant with the NYS Hero Act.

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;
• Refrain from behaviors such as hugging and hand shaking, and
• Wash hands properly and often.

2. Health Screening: Employees shall complete Dr. Chat Bot prior to reporting on-site each day to screen for symptoms of the infectious disease. Employees must self-monitor throughout their shift and report any new symptoms of the infectious disease to their supervisor. An employee showing signs or symptoms of the infectious disease should be removed from the workplace and should contact a healthcare professional for instructions. The health screening elements follow guidance from NYSDOH and CDC guidance, as available.

3. “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 and University Health Service(UHS)/Employee Health as directed, and follow New York State Department of Health (NYSDOH) and Centers for Disease Control and Prevention (CDC) guidance regarding medical care and isolating. If an employee lives with someone confirmed positive or is exposed to someone positive, is fully vaccinated and asymptomatic, they may report to work and must remain masked at all times. If an employee lives with someone confirmed positive or is exposed to someone positive and are unvaccinated, then they will need to receive guidance from UHS or Employee Health.

4. Face Coverings: To reduce the spread of infectious disease, employees must wear face coverings while indoors unless eating or alone in a workspace. Face coverings and physical distancing should be used together whenever possible. The face covering must cover the nose and mouth, fit snugly, but comfortably, against the face and it must not create a hazard (e.g. have features could get caught in machinery or cause severe fogging of eyewear). If the face covering potentially will create a hazard while working, the employee should notify the supervisor of the need for accommodations. The face coverings must be kept clean and sanitary and changed when soiled, contaminated, or damaged.

5. Physical Distancing: Physical distancing should 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 others. Use a face covering when physical distance cannot be maintained.

In situations where prolonged close contact with others is likely, one or more of the following control methods should be implemented:

• restrict or limit customer or visitor entry;
• limit occupancy;
• reconfigure workspaces;
• install physical barriers;
• display informational signage;
• provide floor markings;
• allow remote work as feasible;
• conduct meetings remotely;
• prevent large gatherings;
• restrict travel;
• create new work shifts and/or stagger work hours;
• adjust break times and lunch periods;
• deliver services remotely or through curb-side 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 or EPA approved sanitizer to clean hands BEFORE and AFTER:

• 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, railings, shared work spaces, and tables.

Hand sanitizers are less effective on soiled hands, therefore wash hands rather than using hand sanitizer when your hands are visibly soiled.

7. Cleaning and Disinfection: See Section III of this plan.

8. “Respiratory Etiquette”: Airborne infectious diseases can be spread by droplets expelled from the mouth and nose, therefore employees should exercise appropriate respiratory etiquette by covering nose and mouth when sneezing, coughing or yawning, followed by appropriate hand-washing or sanitizing.

9. Special Accommodations for Individuals with Added Risk Factors: Some employees, due to age, underlying health condition, or other factors, may be at increased risk of severe illness if infected. Individuals should inform their supervisor or the HR Business Representative if accommodations are needed.

B. ADVANCED CONTROLS DURING AN OUTBREAK

For activities where the Minimum Controls alone will not provide sufficient protection for employees, additional controls from the following hierarchy may be necessary. Depending on the circumstances of the infectious disease and based on recommendations from CDC, federal, state, and local health agencies, the following will be considered:

1. **Elimination**: the temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for employees should be considered.

2. **Engineering Controls**: appropriate controls to contain and/or remove the infectious agent, prevent the agent from being spread, or isolate the worker from the infectious agent will be considered. Examples of engineering controls include, but are not limited to:
i. Mechanical Ventilation:
   a. Local Exhaust Ventilation:
      • Ventilated booths (lab hoods);
      • Kitchen Vents; and
      • Vented biosafety cabinets.
   b. General Ventilation:
      • Dedicated ventilation systems for cooking areas, atriums, welding, indoor painting, laboratories,
      • Increasing the percentage of fresh air introduced into air handling systems;
      • Avoiding or reducing the percent of recirculated air;
      • Using higher-efficiency air filters in the air handling system;
      • Arranging fan so that air does not blow directly from one worker to another; and

ii. Natural Ventilation:
   • Opening outside windows and doors to create natural ventilation; and
   • Opening windows on one side of the room to let fresh air in and installing window exhaust fans on the opposite side of the room so that they exhaust air outdoors. (Note: This method is appropriate only if air will not blow from one person to another.)

iii. Install cleanable barriers such as partitions and/or clear plastic sneeze/cough guards.

iv. Change layout to avoid points or areas where employees may congregate.

3. Administrative Controls will also be considered as part of the exposure prevention strategy in conjunction with engineering controls. Examples include:
   • Increase the space between workers;
   • Disinfection 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;
   • Establish pods or cohorts working on same shift
4. **Personal Protective Equipment (PPE)** are devices such as eye protection, face shields, respirators, and gloves that protect the wearer from infection. PPE will be provided, used and maintained in a sanitary and reliable condition at no cost to the employee. The PPE provided to an employee will be based on a hazard assessment for the workplace.

NOTE: The use of respiratory protection, e.g. an N95 filtering facepiece respirator, requires compliance with the OSHA Respiratory Protection Standard 29 CFR 1910.134 or temporary respiratory protection requirements OSHA allows for during the infectious disease outbreak. Respirators with exhalation valves will release exhaled droplets from the respirators and are not appropriate to curtail the spread of airborne infectious disease. Respirators are designed to protect the wearer. Surgical masks and face coverings, which are not respirators, are designed to protect others, not the wearer, by containing large droplets of infectious material released by coughing, sneezing, laughing, singing etc.

C. EXPOSURE CONTROL READINESS, MAINTENANCE AND STORAGE:

The controls selected will be appropriately 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: EPA Registered disinfectants and those approved by the NYS DEC shall be used frequently on objects that are considered “high-touch” surfaces (i.e. door handles, light switches, handrails, shared workstations, etc.). Surfaces that are handled less often, or by fewer individuals, may require less frequent disinfection. Disinfection methods and schedules shall be determined by each unique condition, and manufacturers’ guidance for methods, dilution, use and contact time shall be followed.

B. Adjustments to Normal Housekeeping Procedures: Normal housekeeping 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 or wiping with damp cloth before disinfecting them. Conducting housekeeping during “off” hours may also reduce other workers’ exposures to the infectious agent.

C. If an employee develops symptoms of the infectious disease at work, the area shall be isolated 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. Since trash containers may contain soiled tissue or face coverings, liners should be used in trash containers when feasible. Trash containers shall be emptied often enough to prevent overfilling. Do not forcefully squeeze the air out of the trash bags before tying them closed.
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, report illness to supervisor, 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. UR Management will inform all employees of the existence and location of this Plan, the circumstances under which it can be activated, the infectious disease standard, employer policies, and employee rights under the NY Hero Act Standard. Covid-19 training was implemented in 2020 and is available on MyPath learning platform. Additional information can be found at University of Rochester Coronavirus (COVID-19) Resource Center

B. When this plan is activated, all personnel will receive training which will cover all elements of this plan and the following topics:

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

C. The training will be

1. Provided at no cost to employees and must take place 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);
2. Appropriate in content and vocabulary to your educational level, literacy, and preferred language; and
3. 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. Plan revisions will be documented below.

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 refusal 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. Employees may report any possible violations of this plan or retaliation to their supervisor, HR Business Partner, or the Integrity Hotline.

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<tr>
<th>Revision number</th>
<th>Date</th>
<th>Comments, change summary</th>
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<tr>
<td>1</td>
<td>Sept 2021</td>
<td>Initial document, Covid-19 pandemic</td>
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