Infectious Disease
Preparedness and Response Plan (IDPRP) for
COVID-19

Updated: 12.18.20
Version 6

This plan was developed by the Environmental Health & Safety department to comply with VA DOLI requirements as defined by 16VAC25-220, Emergency Temporary Standard Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19, which went into effect on July 27, 2020.

Note that a permanent standard has been proposed with an effective date to be determined but no later than January 27, 2021, upon which time this IDPRP document will be updated for consistency with the permanent standard.
I. Purpose

This plan describes the implementation of mandatory health and safety requirements established by the Virginia Department of Labor and Industry, Governor Northam's COVID-19 Executive Order and subsequent Addendum as well as guidelines from the Centers for Disease Control.

II. Responsibilities

The University of Virginia (UVA) has assigned the following individual(s) to serve in the role of health officer. The health officer has the authority to stop or alter activities to ensure that all work practices conform to the mandatory safety and health requirements applicable to COVID-19 as well as any other infectious disease hazards.

Names and titles of health officers

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Department</th>
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<tbody>
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</tbody>
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III. Determination of Exposure Risk by Job Duty

We have determined the COVID-19 exposure risk level of all worksite functions to ensure that we apply appropriate hazard controls – including training, equipment, and personal protective equipment (PPE) – to protect employees’ safety and health. This assessment is based on OSHA Publication 3990. Classes of employees have been assigned to risk categories as follows:

*Exposure Risk Level means an assessment of the possibility that an employee could be exposed to the hazards associated with SARS-CoV-2 virus and the COVID-19 disease.*

*Hazards and job tasks have been divided into four risk exposure levels: “Very High”, “High”, “Medium”, and “Lower”.*

**“Very High”** exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure to known or suspected sources of the SARS-CoV-2 virus and the COVID-19 disease including, but not limited to, during specific medical, postmortem, or laboratory procedures (refer to pages 9-10, 29-35 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

**“High”** exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure within six feet with known or suspected sources of SARS-CoV-2 that are not otherwise classified as “very high” exposure risk (refer to pages 10-11, 29-35 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

**“Medium”** exposure risk hazards or job tasks that are not labeled as “very high” or “high” (refer to pages 11-12, 35-39 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

**“Lower”** exposure risk hazards or job tasks are those not otherwise classified as “very high”, “high”, or “medium” exposure risk that do not require contact within six feet of persons known to be, or suspected of being, or who may be infected with SARS-CoV-2; nor contact within six feet with other employees, other persons, or the general public
except as otherwise provided in this definition (refer to pages 12-13 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

The following graph relates to job tasks that pose a risk level to employees. The job tasks that are listed are not an all-inclusive list.

UVA has consulted the definition of “Exposure risk level” of the Emergency Temporary Standard for COVID-19 by the Virginia Department of Labor and Industry, as well as pages 18 - 21 of the OSHA document “Guidance on Preparing Workplaces for COVID-19” (available at http://www.osha.gov/Publications/OSHA3990.pdf) and determined the risk level of each employee or class of employee based on their type of work and duties. The complete list of assigned risk categories to UVA academic-division employees is maintained by UVA’s Human Resources (UHR) department.
IV. Contingency Plan in the Event of an Infectious Disease Outbreak

In the event that an outbreak or pandemic due to an infectious disease, UVA has set up contingency plans for addressing the workplace needs as well as employee safety and health during the outbreak. See UVA’s general Public Health Emergency Plan for more info.

See also the UVA COVID-19 Prevention, Detection, and Response Plan.

V. COVID-19 Prevention and Control Measures

To control the spread of COVID 19, basic prevention and control measures have been implemented to ensure that all employees are protected against the hazards of infectious disease. The University of Virginia will impose health and safety requirements on every student, faculty, and staff member who will be on Grounds in a comprehensive effort to mitigate the risk of virus exposure and transmission. All members of the University community will have to comply with policies and procedures designed to keep members of the UVA and broader community safe. All those returning to Grounds, including all students and employees, will complete a training module that provides key information about what is necessary to mitigate the risk of spreading COVID-19. At the conclusion of this training, all students and employees will be required to acknowledge the risks presented by the virus and agree to abide by these important safety protocols. A summary of these public health measures is provided here:

- *Daily Health Check*. All students, faculty, and staff planning to be on Grounds will complete a daily check on symptoms related to COVID-19 through the HOOS® Health Check app or by email. The HOOS® Health Check app is designed to make individuals aware of their symptoms, to encourage personal responsibility, and, if the individual exhibits symptoms, to provide resources and next steps for testing.
- *Distancing/Face Coverings*. All individuals on Grounds are required to wear face coverings and observe strict distancing. This means maintaining a minimum of six-feet separation, judged from head to head, for any contact longer than fifteen cumulative minutes, unless closer proximity is allowed by physical barriers.
Separation is recommended even for more brief interactions. These rules apply in classrooms, labs, dining halls, lounges, and other communal spaces. Ten-foot separation is required during exercise. These requirements of physical separation are not negated by the wearing of face coverings, which are required in any event except for while dining or exercising with ten-foot separation between people. Requirements for wearing face coverings on Grounds are detailed in University Policy SEC-045: COVID-19 Health & Safety Requirement - Face Masks, Physical Distancing, Events and Gatherings, and Visitors.

- **Provision of Supplies.** The University will provide two cloth face coverings for each employee in the Academic division. For students, the University will provide two cloth face coverings, two two-ounce containers of hand sanitizer and a touch-tool, which is meant to assist in tasks such as opening doors and punching keypads, hands free. If preferred, employees and students may wear their own face coverings that meet policy standards.

- **Hand Sanitizer.** The University will place 2,600 free-standing hand sanitizer stands in high-traffic common areas, plus an additional 1,000 one-gallon containers in spaces that don’t receive the free-standing units. The University has also purchased a supply of sanitizing wipes for use on surfaces such as desks and chairs and disposable face coverings that can be offered to students, faculty, staff, and others who might arrive without one.

- **Cleaning and Disinfecting.** UVA Facilities Management has trained custodial staff on new enhanced cleaning protocols based on industry standards and best practice guidelines from the CDC. In addition, they are adjusting custodial shifts to align with building use. Since it is not possible for the housekeeping staff to clean each classroom between uses, faculty members and students will be asked to wipe down podiums, surfaces, desks, chairs, and tabletops before and after use with disinfecting supplies stocked in the room. All disinfectants are EPA-approved or otherwise comply with CDC disinfection guidance.
  - **Disinfecting vehicles after use.** Each department issues a policy for disinfecting the vehicles under their care. See:
- **Facilities Managements COVID-19 FAQ** “What is the policy for vehicle use during COVID-19?”
- **P&T/UTS FAQ** “How often are the UTS buses being cleaned? What steps are being taken to combat COVID-19?”

- **Signage/Barriers.** Facilities Management is installing signs across Grounds and repositioning furnishings and fixtures as needed to promote social distancing. They are also installing physical barriers at public service locations (such as the bookstore).

- **University Transit Services.** UTS passengers can expect the following changes:
  - Passengers and drivers are required to wear a face covering.
  - Bus loading capacity has been reduced from 50 to 20.
  - Service hours have been reduced to allow for enhanced cleaning/sanitation of the transit fleet midday and after hours.
  - See: UVA’s Parking and Transportation [COVID-19 Rider Guide](#) and [P&T/UTS FAQ](#) “How often are the UTS buses being cleaned? What steps are being taken to combat COVID-19?”

- **Dining Services.** Dining halls will be open for those students with a meal plan, but dine-in options will be limited in all dining halls and retail dining facilities. Dining halls and retail dining locations will reduce seating capacity by 50 percent in accordance with Governor Northam’s Executive Order 63, maintain counts at entrances and exits to control occupancy, and add outside locations where possible for food pick-up. Buffet style service will be eliminated. Most retail dining locations are scheduled to be open in the fall and will be available to students, faculty, and staff with expanded options for take-out and mobile ordering. Please visit the [Dining Services website](#) for up-to-date information.

- **Alternate Work Schedule Considerations.** Managers have increased flexibility to approve remote work and flexible schedules in order to comply with the Governor’s directive in the State of Emergency to implement broad remote work policies to reduce the number of employees on-site at any given time. See [UVA HR's RETURNING TO GROUNDS - HR GUIDANCE](#) FAQs, “What Options Can Managers Offer Employees in Order to Reduce Density and Limit the Spread of
VI. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees protected characteristics as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employee’s personnel documentation.

1. Employee Self-Monitoring

The following employees should not report to work and, upon notification to the University of Virginia, will be removed from the regular work schedule:

- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

UVA actively encourages sick employees to stay home:

- Info on Managing Leave During the Coronavirus (requires Netbadge login) is posted on UVA’s HR COVID-19 Website, where info regarding the Families First Coronavirus Response Act (FFCRA) can be found as well as a link to the FFCRA info poster.
2. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, UVA screens employees on a daily basis via a smart phone/PC/online app called HOOS® Health Check and by daily email reminders.

Employees are asked the following question before entering the worksite:

1. Are you experiencing any of the following new symptoms – cough, shortness of breath or difficulty breathing, fever, chills, muscle pain, sore throat, gastrointestinal symptoms, new loss of taste or smell, and/or congestion or runny nose? Response options and next steps:

   - “No, I Don’t Have Symptoms”
     - Above the response options is the following text, “By selecting “No” below you also affirm that you have not been advised to self-quarantine as part of an active contact trace.”
     - Upon selecting “No” a completion screen appears with a reminder of how to keep the community safe, including mask wearing, physical distancing guidelines, etc.

   - “Yes, I Have Symptoms”
     - Upon selecting “Yes”, a screen appears with next steps including a request to not come to University grounds/work and information on how to contact a medical provider.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources.

3. Contact Tracing

If a member of the UVA community (students, faculty, or staff) is identified through contact tracing as having had close contact with an infected individual, they will be referred for testing by the Virginia Department of Health (VDH) or their health care provider. UVA will partner with VDH to help facilitate the referrals and the testing. It is important that
everyone in the UVA community engages with UVA and VDH teams during case investigation and contact tracing so that we can have the maximum opportunity to limit the further spread of the virus.

4. Return-to-Work Requirements

Employees will need to isolate if they test positive for the virus, and to quarantine if they have been exposed. The health department will determine the required length of time needed for isolation or quarantine and will monitor the health of individuals who are being isolated or quarantined. Current guidance from the Virginia Department of Health on isolation and quarantine is linked here.

Return to work requirements are determined by UVA Employee Health and are subject to change based on rapidly developing technologies, guidance and best practices.

For more info see UVA's COVID-19 Prevention, Detection, and Response Plan.

VII. Procedures for Minimizing Exposure from Outside of Workplace

UVA workplace practices are evaluated to ensure the safety and health of all individuals. This is done on a phased approach. A guide for employees, including researchers, returning to work has been posted on various University websites including:

- UVA Return to Grounds
- Return to Grounds – HR guidance
- Return to Grounds Guide document
- Research Ramp-Up Guidance

Information is posted throughout the University educating individuals on ways to reduce the spread of COVID-19.

To minimize exposure from contract workers, visitors or vendors:

- All business partners that work within UVA have access to this Plan and related COVID prevention policies and procedures.
- When possible, UVA limits the number of visitors on Grounds.
- Masks are available to contract workers/visitors/vendors as well as appropriate disinfectants so individuals can clean work areas before and after use.

- Deliveries of supplies and services are executed in accordance with University policy and public health recommendations. Instructions for delivery may be posted at the building/area entry.

- For more info see: SEC-045: COVID-19 Health & Safety Requirement – Face Masks, Physical Distancing, Events and Gatherings, and Visitors

Minimizing exposure from the general public:

- Social distancing practices to be observed:
  - 6-foot distances are marked in areas where individuals might gather/wait.
  - Limit number of individuals allowed into workplace.
  - Minimize face to face contact:
    - Computer workstations positioned at least 6 feet apart

- Information is posted throughout UVA educating individuals on ways to reduce the spread of COVID-19.

- Any individual entering certain UVA facilities may have their temperature checked and/or a questionnaire completed prior to entry.

- Individual symptoms may be assessed of COVID-19 and individuals with symptoms will be removed from the workplace.

- Where appropriate, physical barriers between UVA employees and the public will be considered in high impact areas (i.e. shielding at the front desk areas).

- Masks may be available to the general public as well as appropriate disinfectants so individuals can clean work areas before and after use.

VIII. Training
All employees at UVA will be required to have training on the hazards and characteristics of SARS-CoV-2 virus and COVID-19 disease. This training will ensure that all employees recognize the hazards of SARS-CoV-2 and COVID-19 as well as the procedures to minimize the hazards related to the infectious diseases and help prevent the spread of the infectious disease.

The training material will cover the following:

- Requirements of the COVID-19 Emergency Regulation.
- Companies Infectious Disease Preparedness and Response Plan.
- Characteristics and methods of spread of SARS-CoV-2 virus.
- Symptoms of COVID-19 disease as well as the asymptomatic reactions of some persons to the SARS-CoV-2 virus.
- Safe and healthy work practices, including but not limited to, physical distancing, disinfection procedures, disinfecting frequency, and noncontact methods of greeting.
- PPE
  - When PPE is required
  - What PPE is required
  - How to properly don, doff, adjust and wear PPE
  - Limitations of PPE
  - Proper care, maintenance, useful life and disposal of PPE

All employees in the workplace will be trained on this subject and procedures. All training will be certified and recorded according to the Emergency Regulations for COVID-19 by the Virginia Department of Labor and Industry.

Training Records will be certified by the following requirements:

- Employee name
- Employee’s signature (physical or electronic)
- Date
- Signature and/or Department of Trainer
Retention of training records are retained in employee files. These records are located in Workday, through Environmental Health and Safety STAR database, or within School/Departmental records. The most recent training records will be maintained.

Training opportunities for UVA employees:

- Training for faculty, staff, and students involved in research: COVID-19 Prevention and Awareness Training
- COVID-19 resources and trainings for clinicians and other health care providers: COVID-19 Resources, Webinars, & On-Demand Training
- Return to grounds training modules for academic employees and managers for those returning to onsite work for fall 2020 semester
Industry Specific Guidelines

(That may apply to UVA)

Research Laboratory Regulations*

Research laboratories but not laboratories that perform diagnostic testing must:

a) Assign dedicated entry point(s) and/or times into lab buildings.
b) Conduct a daily entry screening protocol for employees, contractors, suppliers, and any other individuals entering a worksite, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.
c) Create protocols and/or checklists as necessary to conform to the facility’s COVID-19 preparedness and response plan under section 1(a).
d) Suspend all non-essential in-person visitors (including visiting scholars and undergraduate students) until further notice.
e) Establish and implement a plan for distributing face coverings.
f) Limit the number of people per square feet of floor space permitted in a particular laboratory at one time.
g) Close open workspaces, cafeterias, and conference rooms.
h) As necessary, use tape on the floor to demarcate socially distanced workspaces and to create one-way traffic flow.
i) Require all office and dry lab work to be conducted remotely.
j) Minimize the use of shared lab equipment and shared lab tools and create protocols for disinfecting lab equipment and lab tools.
k) Provide disinfecting supplies and require employees to wipe down their work stations at least twice daily.
l) Implement an audit and compliance procedure to ensure that cleaning criteria are followed.

m) Establish a clear reporting process for any symptomatic individual or any individual with a confirmed case of COVID-19, including the notification of lab leaders and the maintenance of a central log:
   ▪ Clean and disinfect the work site when an employee is sent home with symptoms or with a confirmed case of COVID-19.
   ▪ Send any potentially exposed co-workers home if there is a positive case in the facility.

n) Restrict all non-essential travel, including in-person conference events.

* Note that as part of the research ramp-up guidance put forth by the office of the Vice President for Research (VPR), any research lab that plans to conduct research during the COVID-19 pandemic must first undergo COVID-19 related training, provide a list of research personnel, prepare a lab schedule, and submit a plan to the VPR. For more info see VPR’s Research Ramp-Up Toolkit and EHS’s Lab Ramp Up Checklist for Laboratories.

**Office Regulations**

a) Assign dedicated entry point(s) for all employees to reduce congestion at the main entrance.

b) Provide visual indicators of appropriate spacing for employees outside the building in case of congestion.

c) Take steps to reduce entry congestion and to ensure the effectiveness of screening (e.g., by staggering start times, adopting a rotational schedule where only half of employees are in the office at a particular time).

d) Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways. See University Policy SEC-045: COVID-19 Health & Safety Requirement - Face Masks, Physical Distancing, Events and Gatherings, and Visitors.

e) Increase distancing between employees by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g., cafeterias),
providing visual cues to guide movement and activity (e.g., restricting elevator capacity with markings, locking conference rooms).

f) Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office.

g) Provide disinfecting supplies and require employees wipe down their workstations at least twice daily.

h) Post signs about the importance of personal hygiene.

i) Disinfect high-touch surfaces in offices (e.g., whiteboard markers, restrooms, handles) and minimize shared items when possible (e.g., pens, remotes, and whiteboards).

j) Institute cleaning and communications protocols when employees are sent home with symptoms.

k) Notify employees if the employer learns that an individual (including a customer, supplier, or visitor) with a confirmed case of COVID-19 has visited the office.

l) Suspend all nonessential visitors.

m) Restrict all non-essential travel, including in-person conference events.

References:

- UVA COVID-19 Prevention, Detection, and Response Plan
- Proposed Permanent Standard For Infectious Disease Prevention For COVID-19 (VOSH/DOLI)
- (DOLI) FAQS: Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19, 16VAC25-220
- DOLI's "9 Steps to Achieve Compliance" with VOSH Emergency Temporary Standard, Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19 16VAC25-220
- UHR information RE: COVID-19
- UVA Return to Grounds
- VPR Research Ramp Up Guidance
- EHS COVID-19 Toolkit
- Return to Grounds – UVA HR guidance
- UVA Facilities Management COVID-19 Program
- University Policy SEC-045: COVID-19 Health & Safety Requirement - Face Masks, Physical Distancing, Events and Gatherings, and Visitors