



## **Middlebury College**

### **COVID-19 Exposure Control Plan for Vermont Locations**

**Revised 5-26-2020**

#### **PURPOSE**

The purpose of Middlebury College's COVID-19 Exposure Control Plan is to protect the health and safety of our employees and, by extension, their families and our communities from the respiratory disease COVID-19, which is caused by novel coronavirus SARS-CoV-2.

This plan ensures proper implementation of the mandatory health and safety requirements for all business, nonprofit, and government operations as required by the Vermont Department of Health (VTDOH), Centers for Disease Control and Prevention (CDC), Vermont Occupational Safety and Health Administration (VOSHA), and the Vermont Agency for Commerce and Community Development (ACCD). This written plan documents the measures Middlebury College uses to comply with the requirements and guidelines provided by these agencies.

#### **SCOPE**

This COVID-19 Exposure Control Plan applies to Middlebury College's Vermont locations.

#### **RESPONSIBILITIES**

##### **Environmental Health and Safety Office (EHS)**

- Assess the hazards in the workplace (see Hierarchy of Controls in this document).
- Regularly review guidance from VTDOH, CDC, VOSHA, and ACCD and update this plan as required.
- Provide effective training on COVID-19 to the College community and specific training on required protocols to affected groups (examples: designated health officers, department managers, employees with high risk of occupational exposure).
- Provide guidance to managers, supervisors, and employees on preventative measures (engineering controls, administrative controls) to reduce exposure to COVID-19.

##### **Health Officer**

Vermont's mandatory health and safety requirements currently require all business operations to designate a health officer on-site at every shift responsible for ensuring compliance with the executive order, addendums, and applicable ACCD guidance. Each department must designate a health officer (by name or position, such as supervisor or team leader) for each shift employees are working. In addition to the designated health officer in each department, the Middlebury College EHS coordinator, director of health services, and the Department of Public Safety supervisor (or designee) on-site are designated health officers and have the authority to stop or modify activities to ensure work conforms with the mandatory health and



safety requirements defined by current state of Vermont executive orders and applicable Vermont Agency of Commerce and Community Development (ACCD) guidance.

- Ensures compliance with the mandatory health and safety requirements within his/her department or work area.
- Has the authority to stop or modify activities to ensure work conforms with the mandatory health and safety requirements.
- May be responsible for managing prescreening of employees within department or work area, including temperature checks and health survey.
- Consults with the Middlebury College EHS coordinator on concerns related to compliance with the mandatory health and safety requirements.

## Department Managers and Supervisors

- Develop department-specific exposure prevention plan to meet requirements outlined in this plan.
- Ensure that all employees follow necessary protective measures.
- Enforce compliance with this program.
- Ensure mandatory training for COVID-19 in compliance with ACCD requirements has been completed before employees return to work on-site.

## Employees

- Follow all safety requirements required by College policy and work practices specified in this exposure control plan and department protocols.
- Participate in all required safety training.

## EXPOSURE DETERMINATION

An employee's risk of occupational exposure to COVID-19 depends in part on the industry type and the need for contact within six feet of people known to be, or suspected of being, infected with COVID-19. As employees' job duties change or they perform different tasks in the course of their workday, they may move from one exposure risk level to another. VOSHA has divided job tasks into four exposure risk levels, as shown in the occupational risk pyramid in Figure 1.

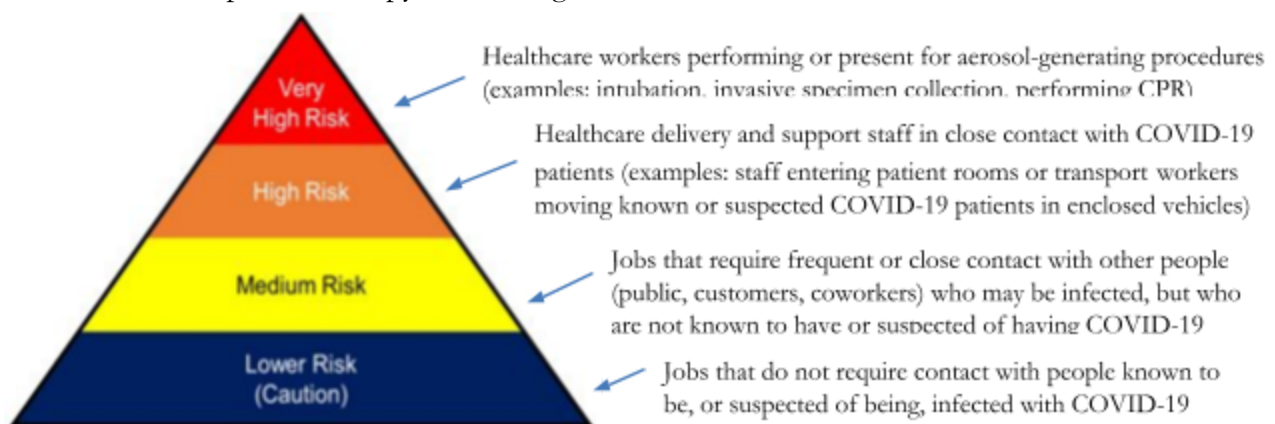


Figure 1. COVID-19 Occupational Exposure Risk



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Middlebury College has conducted a hazard assessment to determine employee risk level and exposure potential. This has been determined by position and/or job task.

## Very High Risk (only considered very high risk when performing tasks described below)

- Employees who perform or are present for aerosol-generating activities (examples: specimen collection, performing CPR).
  - Parton Health Center staff
  - Public Safety staff

## High Risk (only considered high risk when performing tasks described below)

- Employees who are required to be in frequent close contact with known or suspected COVID-19 patients (Parton Health Center staff, Public Safety staff).
- Employees transporting known or suspected COVID-19 patients when in enclosed vehicles where good ventilation (open windows) is not possible.
- Employees trained to enter isolation or quarantine housing AND who require frequent close contact with known or suspected COVID-19 patients (some staff from Residential Life, Custodial Services, Facilities Services).
- Cleaning visible blood, body fluids (including respiratory sections, mucous, etc.), or other potentially infectious materials from people suspected of having or known to have COVID-19. (Note: Exposure risk associated with such work tasks may be lower if proper engineering and administrative controls, safe work practices, and PPE are used.)

## Medium Risk

- Employees entering isolation or quarantine housing who are able to maintain proper social distancing and do not require any close contact with known or suspected COVID-19 patients (Public Safety and some staff from Residential Life, Custodial Services, Facilities Services).
- Employees providing routine cleaning and housekeeping in spaces frequented by staff and/or members of the general public.
- Employees who are in frequent close contact with other people (public, customers, coworkers) who may be infected, but who are not known to have or suspected of having COVID-19, such as in the following circumstances:
  - Working at public-facing locations, where the public or members of the Middlebury community may come for assistance, such as service desks, reception areas, retail locations.
  - Lifting/moving objects with others.
  - Working at a workstation that is closer than six feet to others.
  - Performing job tasks in close proximity to others (maintenance/repairs).
  - Emergency response requiring close proximity to others, such as performing first aid.

## Low Risk

- Employees working remotely.



- Employees working on-site that can maintain proper social distancing from other people.

## HAZARD REDUCTION

This hierarchy of hazard controls shown in Figure 2 is a framework widely used in occupational health and safety to group hazard controls by effectiveness. The most effective way to control a hazard is by elimination or substitution, where the hazard is physically removed or replaced. In the case of COVID-19, elimination or substitution will only be possible when there is an effective vaccine or treatment available.

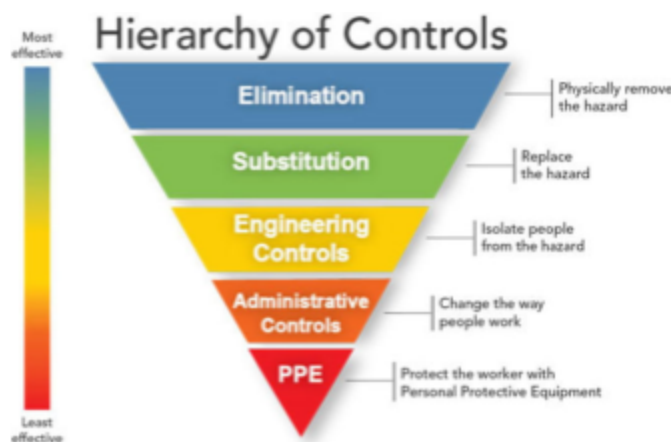


Figure 2. Effectiveness of Hazard Controls

Engineering controls and administrative controls will be used to minimize the hazard of COVID-19 at Middlebury locations. The controls that will be implemented must include mandatory health and safety requirements specified by VTDOH/VOSHA.

### Engineering Controls

Each department/work area will assess required work tasks and work environment to determine which engineering controls can be implemented. Department managers will use an exposure control checklist to evaluate and document actions needed. Engineering controls that will be considered:

- Physical barriers (for example, plexiglass shields) to separate employees from others in any public-facing or high-traffic work areas, or in locations where employees must work with less than six feet between people.
- Isolation of tasks by relocating specific work to other locations.
- Rearranging workstations (computers or other types of workstations) to ensure they are six feet apart when employees must work in the vicinity of one another.
- Improve ventilation as feasible when multiple people are working in an indoor workspace.



## Administrative Controls

Administrative controls can be very effective in preventing the spread of COVID-19. Each department/work area will assess required work tasks and work environment to determine which administrative controls can be implemented. Department managers will use an exposure control checklist to evaluate and document actions needed. Administrative controls that will be considered:

- **Remote work must be utilized whenever possible**, as the state of Vermont is requiring that all business, nonprofit, and government operations work remotely whenever possible.
  - Identify the specific tasks that require on-site work and schedule only those activities on-site, keeping all other work remote.
- Use technology to relocate (or replace) a task that may normally be conducted on-site.
- Adjust schedules to limit interaction between employees (in the case an employee tests positive, this will limit the number of other employees potentially exposed and requiring quarantine).
  - Keep individuals together on a shift; avoid mixing of individuals into different shifts.
  - Modify start/end times of shifts to avoid crossover of shifts.
- Stagger breaks to ensure there is adequate space for people to prepare food or eat meals, and limit number of people together in one space (no congregation).
- Reclassify the occupancy (and post the new occupancy) of common areas and break areas to ensure that proper social distancing of six feet is maintained.
- Require strict social distancing in the workplace.
- Discourage use of shared workspaces, desks, offices, etc., to the maximum extent practicable.
- Tape off workstation areas on the floor to indicate directional work flow and/or visually indicate six-foot distance in areas requiring multiple individuals.
- Set up a safe process to receive supplies and deliveries (outside pickup/exchange to keep delivery vendors and suppliers out of buildings).
- If travel is required to locations on or off campus, do not allow employees to drive with others.
- Only one person shall occupy a College vehicle at a time, unless approved by supervisor or department manager (note that Vermont requirements allow a max of two people per vehicle and use of cloth face coverings is required).

## Personal Protective Equipment

When an employee's work task requires the need for contact within six feet of people known to be, or suspected of being, infected with COVID-19, their exposure risk can be reduced significantly by wearing personal protective equipment (PPE) properly. In addition, provide the infected person with a standard surgical mask to cover their nose and mouth, if they are not already wearing one. Employees required to wear PPE will receive specific training on the proper use of PPE, donning and doffing techniques, and the protocols for the specific task they are performing.



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PPE may include some or all of the following:

- Gloves: Various gloves protect against varying hazards; most commonly, medical-grade nitrile or latex gloves are used to protect against COVID-19 exposures.
- Body protection: In some situations, varying forms of body protection are worn to protect from COVID-19 exposure (isolation gowns, Tyvek suits, cloth laboratory coats or scrubs).
- Eye/face protection: Eye protection (goggles or, at a minimum, safety glasses with side protection) should be worn for those involved in the direct contact of known or suspected COVID-19 infected individuals; face shields can be used in conjunction with eye protection.
- Respiratory protection: These must be used in compliance with Middlebury College's Respiratory Protection Program (which complies with OSHA 29 CFR 1910.134):
  - N95 Respirators
    - **Proper training and fit testing is required** before using any N95 respirator; contact the EHS Office for more information.
    - Due to the COVID-19 pandemic, N95 respirators are in short supply and should be saved for healthcare providers, first responders, and any College staff who may be required to have close contact (within six feet) of an individual with COVID-19 or direct contact with body fluids from an individual with COVID-19.
  - Powered Air Purifying Respirators (PAPRs)
    - PAPRs may be used as respiratory protection in the case an employee is not medically cleared to wear an N95 respirator or cannot successfully pass a fit test, or N95s are not available.
    - PAPRs require a medical evaluation and training (no fit test).
    - Proper cleaning and disinfecting of PAPRs is critical when used to protect against COVID-19 exposure.
- Surgical/medical facemasks: These types of facemasks provide droplet protection, are in short supply, and should be saved for healthcare providers, first responders, and any College staff who may be required to have close contact (within six feet) of an individual with COVID-19 or direct contact with body fluids from an individual with COVID-19.

## Cloth Face Coverings

IMPORTANT NOTE: Cloth face coverings are NOT considered personal protective equipment (PPE). When worn, cloth face coverings can aid in reducing the spread of the virus by containing respiratory droplets/secretions from the person wearing the face covering. The primary intent of cloth face coverings is to prevent the wearer **from spreading the virus to others**, especially by asymptomatic individuals.

A cloth face covering is any well-secured cloth (like a cloth facemask or bandana) that covers your mouth and nose. Cloth face coverings are intended to be used **in addition** to social distancing and hand hygiene,





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not as a replacement. Cloth face coverings may not prevent you from getting infected, but may prevent you from infecting others unknowingly.

Cloth face coverings should do the following:

- Fit snugly but comfortably against the side of the face.
- Be secured with ties or ear loops.
- Include multiple layers of fabric.
- Allow for breathing without restriction.
- Be able to be laundered and machine dried without damage or change to shape.

Wear a cloth face covering properly, to prevent exposure:

- Wash your hands before putting on your cloth face covering.
- Do not touch your face or your cloth face covering with unwashed hands. Do not touch any personal items (keys, cell phone, etc.) with unwashed hands.
- Always wash your hands immediately after removing or handling your cloth face covering.
- Do not repeatedly pull the cloth face covering up and down, or repeatedly adjust it, which can increase the chance of exposure by touching your face.
- Never wear a wet or dirty cloth face covering.
- Do not put your cloth face covering down where others can touch it, or on countertops or tables.

## MANDATORY HEALTH AND SAFETY REQUIREMENTS

Each department/work area must develop a specific exposure control plan, which identifies the engineering and/or administrative controls used to reduce exposure to COVID-19. All work activities must be in compliance with the state of Vermont's mandatory health and safety requirements and Middlebury College requirements that are detailed in this section. The Environmental Health and Safety Office will provide a checklist to assist department managers with developing the specific exposure control plan.

### Stay Home If Sick

- Employees shall not report to, or be allowed to remain at, work or the job site if sick or symptomatic (with fever, cough, and/or shortness of breath).
- Employees who have knowledge of close contact with an individual who is diagnosed with COVID-19 shall not be permitted on-site and shall quarantine for 14 days.
- Prior to the commencement of each work shift, prescreening, including temperature checks and health survey, shall be required to verify each employee has no symptoms of respiratory illness (fever, cough, and/or shortness of breath, or other [COVID-19 symptoms](#), such as chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell).



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- Signs must be posted at all entrances clearly indicating that no one may enter if they have symptoms of respiratory illness.

## Personal Hygiene and Cloth Face Coverings

- Employees must have easy and frequent access to soap and water or hand sanitizer (alcohol-based hand sanitizer with at least 60 percent alcohol) during duration of work, and handwashing or hand sanitization is required frequently, including before entering and leaving work areas.
- Employees should refrain from touching their faces.
- Employees must wear face coverings over their nose and mouth when in the presence of others. Specifically, cloth face coverings must be worn under the following conditions:
  - If you are within six feet of another individual (even outside locations).
  - If you are inside any common/public space, including entryways, hallways, stairways, elevators, shared work areas, classrooms, bathrooms, etc., in a building that may be occupied by others.
  - If you enter or perform work in another individual's office or work area, when occupied.
- Cloth face coverings do not need to be worn in individual work areas assigned to only one person and when only the individual is present (example: an individual's office).
- Any visitors or customers, and the public in general, are asked to wear face coverings any time they are interacting with others from outside their household or entering Middlebury buildings.
- **Wearing a cloth face covering is no substitute for social distancing.** Do not develop a false sense of security because your face is covered or you are around someone else that is wearing a cloth face covering.
- Employees are responsible for laundering their own cloth face coverings. Clean cloth face coverings regularly, by hand or machine, using detergent, and dry them thoroughly.

## Cleaning and Disinfecting

- All common spaces and equipment, including bathrooms, frequently touched surfaces and doors, tools and equipment, and vehicles must be cleaned and disinfected regularly.
- Follow CDC guidance to ensure cleaning and disinfecting is done properly:  
<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>
- Custodial services provides cleaning services to College locations. However, it is each department's responsibility to disinfect frequently touched objects and surfaces in shared work areas, break areas, and common spaces. Contact Facilities Services at [facmanag@middlebury.edu](mailto:facmanag@middlebury.edu) if you have questions about the services provided in your work area.
- Ensure that proper cleaning and disinfecting supplies are available and train employees on protocols for cleaning frequently touched surfaces, equipment, tools, vehicles, etc., after use and before





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transfer to another person. The training must include review of any Safety Data Sheets (SDSs) for any chemicals used. The College SDS inventory can be found at [go.middlebury.edu/sds](https://go.middlebury.edu/sds).

- If items are shared between people (equipment, tools, computers, vehicles, etc.), clean and disinfect surfaces before transfer between individuals.

## Social Distancing and Work Areas/Common Spaces

- Employees must observe strict social distancing of six feet while on the job. Businesses shall ensure customers and visitors observe strict social distancing of six feet while on location, to the extent possible.
- No congregation of employees shall be permitted on-site, except for necessary work.
- If possible, access to common areas, break rooms, or lunchrooms should be closed, or meet the following requirements:
  - The occupancy of common areas or rooms should be limited (and enforced) so that occupants maintain strict social distancing of no less than six feet per individual.
  - Handwashing facilities and/or hand sanitizer shall be immediately available at entrances of designated common area or room.
  - Employees shall be required to wipe down their area prior to leaving, or there shall be cleaning of the area at regular intervals throughout the day.
  - At the entrances of the designated common area or room, the policy shall be posted limiting the occupancy of the space, and the minimum social distancing, handwashing/hand-sanitizing, and space-cleaning requirements.
- Only one employee shall occupy a College vehicle at a time, unless approved by supervisor or department manager; transport of a student per College protocols is allowed (Vermont state requirements allow a max of two people per vehicle with the use of cloth face coverings required).
- Indoor workspaces where more than two employees are working must have good air circulation.
  - When working inside, open doors and windows to promote airflow to the greatest extent possible and limit the number of people occupying a single indoor space.
  - If department managers have questions about specific workspace ventilation, contact Facilities Services Customer Service.

## Designated Health Officer

- All operations shall designate a health officer on-site at every shift responsible for ensuring compliance with the Vermont executive order, addendums, and applicable ACCD guidance. This person shall have the authority to stop or modify activities to ensure work complies with the mandatory health and safety requirements.



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- Departments must identify the position (example: team leader, supervisor) or individual who will act as the health officer for any shift that employees are working. If guidance is needed, please contact the Environmental Health and Safety Office.

## Mandatory Training

- All employees must complete, and employers must document, a mandatory training on health and safety requirements as provided by VOSHA, or another training program that meets or exceeds the VOSHA-provided standard. Middlebury College employees for Vermont locations must view the COVID-19 Update: Returning to Work Safely training program in SafeColleges to meet this requirement. Log in to SafeColleges using a Middlebury College email address at <https://middlebury.safecolleges.com/login>.
- All employees must be trained on the department's COVID-19 Exposure Control Plan and specific department protocols before performing work on campus.
- Employees who must enter an area and potentially have frequent close contact (within six feet) of a person infected with or suspected of being infected with COVID-19 must receive specific training on protocols and PPE use through the EHS Office.

## RESOURCES

### Federal and State Agencies:

- Centers for Disease Control and Prevention (CDC): <https://www.cdc.gov/>
- Occupational Safety and Health Administration (OSHA): <https://www.osha.gov/>
- Vermont Occupational Safety and Health Administration (VOSHA): <https://labor.vermont.gov/vermont-occupational-safety-and-health-administration-vosha>
- Vermont Department of Health (VTDOH): <https://www.healthvermont.gov/>
- Vermont Agency for Commerce and Community Development (ACCD): <https://accd.vermont.gov/>

### Vermont Executive Orders and Requirements

- Executive Orders  
<https://governor.vermont.gov/document-types/executive-orders>
- VT ACCD COVID-19 Recovery Resource Center  
<https://accd.vermont.gov/covid-19>
- Update on New Work Safe Additions to the Stay Home, Stay Safe Order  
<https://accd.vermont.gov/news/update-new-work-safe-additions-stay-home-stay-safe-order>

### Cleaning and Disinfecting

- CDC Guidance  
<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

### Cloth Face Coverings



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- VTDOH Guidance  
<https://www.healthvermont.gov/sites/default/files/documents/pdf/COVID-19-VDH-mask-guidance.pdf>
- CDC Guidance  
<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>  
<https://www.cdc.gov/coronavirus/2019-ncov/downloads/cloth-face-coverings-information.pdf>

For more information on Middlebury College's safety resources, visit <http://go.middlebury.edu/covid19> or contact the Middlebury College Environmental Health and Safety Office at 802-443-5726.