

# BARNARD COLLEGE

## Airborne Infectious Disease

### Exposure Prevention Plan under the NY HERO ACT

The purpose of this plan is to protect employees, community members and all individuals on campus 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 “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.

Per the Department of Labor, while the State continues to deal with COVID-19 and a risk still exists, no designation is in effect at this time. Please check 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 and students of **BARNARD COLLEGE** , and all campus properties:

Main campus bounded by W. 116th and W. 120th, and Claremont and Broadway
Other buildings owned by the College, including multiple dormitories nearby

This plan requires commitment to ensure compliance with all plan elements aimed at preventing the spread of infectious disease. The following supervisory employee(s) in

coordination with our Emergency Management Committee are designated to enforce compliance with the plan. Additionally, these supervisory employees will act as the designated contacts unless otherwise noted in this plan:

Name	Title	Location	Phone
Roger Mosier	VP Operations	Barnard Campus	212-854-0250
Amy Zavadil	AVP CARES	Barnard Campus	212-854-0250
Laura O'Connell	AVP Facilities	Barnard Campus	212-854-0250

## 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 campus:

1. **General Awareness:** Individuals may not be aware that they have the infectious disease and can spread it to others. Employees and all community members should remember to:

- Maintain physical distancing;
- Exercise coughing/sneezing etiquette;
- Wear face coverings, gloves, and/or personal protective equipment (PPE), as appropriate;
- Individuals 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 a community member develops symptoms of the infectious disease, the individual should not be on campus. Faculty, staff, and students who feel sick are to stay home, even if their symptoms are inconsistent with common symptoms of the

infectious disease. Any community member exhibiting symptoms should inform the designated contact 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:** The College will follow health screening guidance from NYSDOH and CDC, if available. This may include a daily health screening for individuals coming to campus and self-monitoring.

4. **Regular Testing:** To the extent that testing for the infectious disease is available and accessible to the College, the College may begin or reinstate a regular testing program.

5. **Face Coverings:** The College will issue guidance and protocols regarding face coverings, in compliance with state and local guidance, and, if applicable, independent medical advice.

6. **Physical Distancing:** Physical distancing will be followed as much as feasible, as appropriate given the circumstances. Directives may include to 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.

*In situations where prolonged close contact with other individuals is likely, use the following control methods:*

- 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;
- Space capacities may be reduced to ensure appropriate physical distancing (minimum of 6 ft.) between individuals in classrooms and other shared spaces.

Furniture may be removed or disabled in order to de-densify spaces. Tents may be erected on campus in order to provide opportunities for outdoor instruction or meetings.

- Scheduling and appointment systems will be utilized to control reservable spaces, such as classrooms and tents, as well as shared spaces. The Registrar will control the majority of classroom scheduling; science departments will control scheduling of laboratories and science classrooms. Reservation systems will be utilized for faculty and staff to reserve meeting spaces, shared spaces, and tents.
- Class schedules may be adjusted to spread out classes over the full week and to allow adequate time between classes to avoid unnecessary congestion.

7. **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:

- 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, gas pumps, shopping carts, or electronic cashier registers/screens.

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

8. **Cleaning and Disinfection:** See Section III of this plan.

9. **“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.

10. **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. Employees will be reminded to inform their supervisor or the HR department if they may fall within this group and need an accommodation. Students will utilize campus services (CARDS) for requesting accommodations.

11. **COVID-19 Vaccination.** Beginning in Fall 2021, all members of the Barnard community will be required to show proof of vaccination, unless they have an approved exemption.

12. **Flu shots.** All members of the campus community must fulfill the College's flu vaccination requirements.

13. **Community pledge.** Community members must continue to adhere to community expectations established through a community pledge that emphasizes the responsibility of every member of the community in helping to maintain a safe campus environment by complying with all federal, state and local requirements and Barnard COVID-19 policies.

## **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. The College is prepared to reduce operations, ramp down, or shut down the in-person operations of the College as necessary to safeguard the health and safety of the Barnard community. A decision to reduce operations would be made by the College leadership in close consultation with the Board of Trustees as a result of changes in regularly monitored metrics indicating that the reduction in operations is warranted for the health and safety of the students, faculty, and staff or as mandated by a governing body. The reduction in operations can be phased, or circumstances can immediately warrant the complete shutdown of in-person operations and can include any one or a combination of the actions below.

The College will determine if the following are necessary.

1. **Elimination:** The College may consider the temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for employees. Examples include:
  1. Limiting or eliminating in-person learning,
  2. Limiting gatherings by location (outdoors), and scale
  3. Limiting or eliminating in-person recreational and/or sporting events.
2. **Engineering Controls:** The College may 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 and general ventilation controls and optimization efforts include:

- Increasing the percentage of fresh air introduced into air handling systems;
- Minimizing air recirculation;
- Utilizing air filters with rating of Minimum Efficiency Reporting Value (MERV) 13 or higher, if compatible with the HVAC system(s). If MERV-13 or higher filters are not compatible with the HVAC system(s), use filters with the highest compatible filtering efficiency for the HVAC system(s);
- If fans are used in the facility, arrange them so that air does not blow directly from one worker to another. Remove personal fans as necessary but keep heat hazards in mind and address in other methods if appropriate; and
- Deployment of air purifiers, including high efficiency purification units as well as units with integrated ultraviolet light technology for certain applications.

3. Natural Ventilation, for example:

- Opening outside windows and doors; 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.
- Automatic disinfection systems such as ultraviolet light disinfection systems.
- Install cleanable barriers such as partitions and clear plastic sneeze/cough guards.
- Establish entry to building protocols that are contactless.
- Install hand washing or sanitizing stations throughout facilities.

Subject to changes based on operations and circumstances surrounding the infectious disease, engineering controls that are anticipated to be used are listed in the following table:

Engineering Controls Utilized/Location:
Cleaning and disinfection: Cleaning and disinfection of the campus facilities will continue to be performed following a comprehensive program.
Ventilation: All ventilation systems have been reviewed by an outside engineering consulting firm. Ventilation will continue to be improved through a series of actions including increasing outdoor air intake amounts and improving filtration.

Ultraviolet lights: Ultraviolet lights will continue to be installed in key locations.

Windows: Windows will continue to be made operable in many locations where they have been previously sealed shut. Window guards will continue to be installed as necessary.

Air Handling Units: As weather permits, air handling units that service multiple adjoining occupied spaces will be shut down to reduce/eliminate the air transmission between individual spaces.

Facility Support Systems: All major facility support systems and utilities, such as electrical systems, water supply, and life safety systems, have continuously remained in service and will continue to be operated in good working order.

Quarantine and isolation capacity have been considered in determining the maximum number of students who could live in Barnard Housing. Barnard has set aside rooms in the dormitories for residential student isolation. Barnard faculty and staff living in College residences have been informed of their responsibility to manage their own quarantine/isolation arrangements.

4. “Administrative Controls” are policies and work rules used to prevent exposure. Examples include:

- Increasing the space between employees and students;
- 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;
- Close break rooms;



- Prohibiting eating and drinking in the work area;
- Do not utilize drinking fountains;
- Post signs reminding of respiratory etiquette, masks, hand hygiene;
- 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 of staff and students to limit exposure;
- Minimize elevator use, post signage of limitations;
- Increase time between classes to allow for cleaning and ventilation;
- Utilize remote learning methods;
- Require health screening of students upon entry to facilities; and
- Limit attendance of in-person meetings. Host the meetings outdoors or electronically.

Subject to changes based on operations and circumstances surrounding the infectious disease, the following specific administrative controls are anticipated to be used:

#### Administrative Controls Utilized/Location:

- Continuation of disinfection protocols to the appropriate extent
- Review and evaluation of work spaces and work schedules for administrative staff
- Reduced frequency of in-person meetings and gatherings, with strict controls on outside attendees
- Continued indoor mask requirements
- Restrict/limit travel
- Comprehensive protocols related to campus visitors, including vendors, admissions tours, etc.
- Daily health attestation interlocked with electronic security access to campus buildings
- Detailed signage on campus indicating protocols and requirements
- Reduced hours of campus access and new perimeter controls for academic and administrative buildings

5. Personal Protective Equipment (PPE) are devices like 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. The following PPE that are anticipated to be used are in the following table:

PPE Required - Activity Involved/Location:
PPE will be procured for all members of the Barnard on-campus community for the academic year and will be made available, at no cost, to faculty, staff, and students.
Special PPE will be provided in the sciences to augment typical laboratory-issued PPE, including face shields, gloves, gowns, and lab coats.

*1 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.*

*2 Respirators with exhalation valves will release exhaled droplets from the respirators. Respirators are designed to protect the wearer. Surgical masks and face coverings, which are not respirators, are designed to protect others, not the wearer.*

**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**

The College will implement a comprehensive program for increased cleaning and disinfection of the campus.

As part of the program, the College will continue to ensure the regular maintenance of the on-campus facilities, including more frequent cleaning and disinfection of restrooms, high-traffic areas used by many individuals, and frequently touched surfaces.

In addition, appropriate signage will be posted across campus emphasizing the necessity and requirement of hygiene, including hand-washing. Restrooms are stocked with appropriate hand-washing supplies and touch-free hand sanitizer stations have been placed in key high-traffic locations across campus.

The College is committed to providing a safe work environment for our staff who are tasked with this work. As a result, the College provided new and additional training on cleaning and disinfection procedures prior to the start of the fall semester with additional training as necessary. In addition, materials and tools used by employees will be regularly cleaned and disinfected, and “hygiene stations” have been established across campus in key locations that will include disinfectant wipes for use by the campus community in disinfecting workstations or classroom areas before and after use.

#### **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 may need to be cleaned more 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 compiled lists of approved disinfectants that are effective against many infectious agents (see [dec.ny.gov](https://dec.ny.gov) and [epa.gov/pesticide-registration/selected-epa-registered-disinfectants](https://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](https://www.cdc.gov) for more guidance.

C. 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. In the event that an individual is confirmed with a positive diagnosis of the infectious disease, the exposed areas that person has come in contact with will be cleaned and disinfected, including all heavy transit areas and high-touch surfaces. In addition, all dedicated spaces used by the individual, such as a student room or staff office, will be closed off. A contracted cleaner will be brought in after an appropriate waiting period to clean such spaces with proper materials and protective equipment.

D. 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.

As a result of its location in New York City, members of the Barnard community staff have access to numerous medical local facilities, including but not limited to Mount Sinai Morningside, New York- Presbyterian Medical Center, and Columbia University Irving Medical Center. Staff at Barnard may monitor published metrics of local medical capacity.

Members of the Barnard community who require transportation to the local medical facilities will be transported by ambulance accessed by dialing the City's 911 system. To the extent that the Columbia University Emergency Medical Service is available and able to transport members of the Barnard community to local hospitals, they will also be utilized. The College has a relationship with a private ambulance company and may utilize that resource if needed.

- Follow local and state authority guidance to inform impacted individuals.
- The College may operate its own supplemental contact tracing program to focus on tracing Barnard College contacts from Barnard students, faculty, and staff who test positive for an infectious disease.

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

A. **BARNARD COLLEGE** will inform all employees 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 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 our worksite 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 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. Verbally provided in person or through telephonic, electronic, or other means.

## VI. PLAN EVALUATIONS DURING A DESIGNATED OUTBREAK

The College 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:

Plan Revision History			
Date	Participants	Major Changes	Approved By


**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. 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.

## **VIII. COMMUNICATION**

The College may communicate information about COVID-19 and other infectious diseases broadly to the Barnard College community (students, faculty, staff, and parents), providing necessary health and wellness resources and support during an outbreak.

The College may do this through a variety of means, including but not limited to the following:

- A dedicated website, updated regularly, with frequently asked questions and resource information for all members of the community.
- Periodic emails to faculty, staff, students, and parents with key decisions and policies around health and safety.
- Online newsletters.
- Ongoing social media campaigns to emphasize community culture of responsibility, including masks, social distancing, etc.
- Webinars targeted to various topics with students, staff, faculty, and parent cohorts.
- Posters, digital signage, floor markers outlining health and safety protocols.