

Bard College Airborne Infectious Disease Exposure Prevention Plan

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 a 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 workplace, as well as any individual delivering goods or transporting people at, to or from the workplace 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.

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I. Responsibilities

This Plan applies to all employees of Bard College.

This Plan requires commitment to ensure compliance with all Plan elements aimed at preventing the spread of infectious disease. The following supervisory employees are designated to enforce compliance with the Plan. Additionally, these supervisory employees will act as designated contacts, unless otherwise noted in this Plan:

Name	Title	Location	Phone
Kimberly Alexander	Director of Human Resources	Ludlow	845-758-7516
John Gomez	Assistant VP of Operations	Old Gym	845-758-7700
Michael Clayton	Director of Buildings & Grounds	Buildings & Grounds	845-758-7465
Michael Bemis	Director of Environmental Services	Old Gym	845-758-7373

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 workplace:

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 proper coughing/sneezing etiquette;
 - Wear face coverings, gloves, and other personal protective equipment (PPE), as appropriate;
 - Limit what they touch;
 - Avoid social etiquette behaviors such as hugging and hand shaking; and
 - Wash hands properly and often.
2. **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 a 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:** An employee showing signs or symptoms of the infectious disease should be removed from the workplace and should contact a healthcare professional for instructions. If health screening is required by NYSDOH and/or CDC, the College will implement a compliant process consistent with NYSDOH and CDC guidance.
4. **Face Coverings:** Employees will wear face coverings throughout the workday to the greatest extent possible as appropriate for and advised by NYSDOH and CDC or other appropriate health agency. Face coverings and physical distancing should be used together whenever possible. The face covering must cover the nose and mouth, and fit snugly, but comfortably, against the face. The face covering itself must not create a hazard. The face coverings must be kept clean and sanitary and changed when soiled, contaminated, or damaged.
5. **Physical Distancing:** Physical distancing will be followed as much as is feasible. Employees should 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. Employees will use a face covering when physical distance cannot be maintained.

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

- Restricting or limiting visitors;
- Limiting occupancy;
- Reconfiguring workspaces;
- Physical barriers;
- Signage;
- Floor markings;
- Telecommuting;
- Remote meetings;
- Preventing gatherings;
- Restricting travel;
- Creating alternative work shifts and/or staggering work hours; and
- Adjusting break times and lunch periods.

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 to clean hands BEFORE and AFTER:
 - Touching their eyes, nose, or mouth;
 - Touching their 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, employees should wash their hands when their hands are soiled, rather than using hand sanitizer.
7. **Cleaning and Disinfection:** See Section III of this Plan.
8. **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.
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. Employees should inform their supervisor or HR if they fall within this group and need an accommodation.
10. The [Return To Campus Guidebook For Employees](#) has more specific information for minimum controls.

B. Advanced Controls During An Outbreak

For activities where the Minimum Controls alone will not provide sufficient protection for employees, additional controls may be necessary. In these circumstances, the College will determine if the following are necessary:

1. **Elimination:** Temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for employees. This may include, but is not limited to:
 - Limiting in-person learning sessions;
 - Limiting gatherings by location (indoors/outdoors), and scale;
 - Limiting or eliminating in-person recreational and/or athletics events.
2. **Engineering Controls:** The College will consider appropriate controls to contain and/or remove the infectious agent, prevent the agent from being spread, and/or isolate employees from the infectious agent. This may include, but is not limited to:
 - Mechanical Ventilation, such as local duct exhaust ventilation;
 - General Ventilation, such as:
 - Increasing the percentage of fresh air introduced into air handling systems;
 - Avoiding air recirculation;
 - Utilizing air filters with rating of Minimum Efficiency Reporting Value (MERV) 13 or higher or, if MERV-13 or higher filters are not compatible with the HVAC system(s), using filters with the highest compatible filtering efficiency for the HVAC system(s);
 - Air purifiers;
 - If fans are used in the facility, arranging them so that air does not blow directly from one worker to another. Removing personal fans as necessary, but keeping heat hazards in mind and addressing using other methods as appropriate;
 - Natural Ventilation, such as:
 - Opening outside windows and doors;
 - 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;
 - Installing cleanable barriers, such as partitions and clear plastic sneeze/cough guards; and

- Installing 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
Approximately 75 Return to Campus Plans for individual programs/departments were completed by Department Supervisors and approved by a Response Team subset in 2021. Site visits for administrative and faculty office buildings were conducted with all supervisors and department chairs before they were allowed to bring their staff or department members back to campus. In addition, all public and academic buildings went through the same process with either a building manager or subset of the Response Team. These plans are on file and secured in a shared Google Drive.
Controls include verifying natural and mechanical ventilation, replacing filters in HVAC systems, when applicable, opening windows before and after classes, installing directional signage, installing campus signage in bathrooms and common areas, providing disinfecting spray and wipes in multiple places in each building, increasing hand sanitizer stations, providing individual hand sanitizers, installing barriers, and reconfiguring office furniture to increase distancing.

3. **Administrative Controls:** Policies and work rules used to prevent exposure. This may include, but is not limited to:

- Increasing the space between employees and students;
- Implementing disinfecting procedures for specific operations;
- Conducting employee training;
- Identifying and prioritizing job functions that are essential for continuous operations;
- Cross-training employees to ensure critical operations can continue during worker absence;
- Limiting the use of shared workstations;
- Closing break rooms;
- Prohibiting eating and drinking in the work area;
- Not utilizing drinking fountains;
- Posting signs reminding of respiratory etiquette, masks, hand hygiene;
- Rearranging traffic flow to allow for one-way walking paths;
- Providing clearly designated entrance and exits;
- Providing additional short breaks for handwashing and cleaning;
- Establishing pods or cohorts of staff and students to limit exposure;
- Minimizing elevator use, posting signage of limitations;
- Increasing time between classes to allow for cleaning and ventilation;
- Utilizing remote learning methods;
- Requiring health screening of students and/or employees upon entry to facilities; and
- Limiting attendance of in-person meetings. Hosting 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
The College will implement and follow the administrative controls listed above as is appropriate. A full list of controls and more details can be found in the Employee Return to Campus Guide published on the HR website and within individual department return to campus plans. All employees, including essential employees who remained on campus throughout, were previously required to read the RTC guide and sign a health pledge before returning to work.

4. **Personal Protective Equipment (PPE):** 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 PPE anticipated to be used is in the following table:

PPE Required - Activity Involved/Location
<p>Masks are available throughout campus, with dispensers in the following locations:</p> <ul style="list-style-type: none"> ● RKC - Dispenser located across from room 103. ● Olin Humanities - Dispenser located to the right of the elevator on the first floor. ● Olin Language - Dispenser located across from the elevator on the first floor. ● Rose - Dispenser is located across from the fire panel in the first floor entranceway. ● Hegeman - Dispenser located to the left of the fire panel across from the stairwell. ● Kline - Dispenser located on the right hand side wall near the main entrance. ● Campus Center - Dispenser located on the first floor across from the information desk. ● Security (Old Gym) - Dispenser located to the right of the dispatch window. ● Fisher Center - Dispenser located inside the rear loading dock entrance to the left. ● Stevenson Gym - Dispenser located at front desk at main entrance.
<p>Gloves are supplied to all employees at Health Services and Dining Services and available on request at Security/Old Gym.</p>
<p>Hand sanitizer stations are available throughout campus. Additional hand sanitizer is available on request at Security/Old Gym.</p>
<p>N95 Masks are available to employees who have been certified to use them. Additional masks are available at Security/Old Gym.</p>
<p><i>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. Respirators are designed to protect the wearer. Surgical masks and face coverings, which are not respirators, are designed to protect others, not the wearer.</i></p>

C. Exposure Control Readiness, Maintenance, and Storage

The physical exposure controls the College has selected will be obtained, properly stored, and maintained so that they are ready for immediate use in the event of an infectious disease outbreak. Any applicable expiration dates will be properly considered.

III. Cleaning During A Designated Outbreak

A. Disinfection Methods and Schedules

Objects that are touched repeatedly by multiple individuals, such as door handles, light switches, handrails, control buttons/levers, dials, levers, water faucet handles, computers, and phones must be cleaned 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. The College will select disinfectants based on NYSDOH and/or CDC guidance and follow manufacturer guidance for methods, dilution, use, and contact time.

B. Adjustments to Normal Cleaning Procedures

Normal cleaning duties and schedules will 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. Routine procedures may need to be adjusted, and additional cleaning and disinfecting may be required.

C. If an employee develops symptoms of the infectious disease at work, the College will take the following actions to clean the areas used by the employee:

- Close off the areas used by the person who is sick (may be classroom, office, or larger area);
- Open outside doors and windows to increase air circulation in the area;
- Wait 24 hours before cleaning and disinfecting;
- Clean and disinfect all areas used by the person who is sick;
- Vacuum floors using a vacuum with a HEPA filter, if applicable;
- Mop floors with Oxiver disinfectant, if applicable;
- Once an area has been appropriately disinfected, reopen the area used; and
- Continue routine cleaning and disinfection.

IV. Infection Response During A Designated Outbreak

If an actual or suspected infectious disease case occurs at work, the College will take the following actions:

- Instruct the sick individual to wear a face covering, leave the workplace, contact a healthcare provider for instructions, and follow NYSDOH/CDC guidance.
- Follow local and state authority guidance to inform impacted individuals.
- Follow the cleaning protocol described in Section III, Part C of this Plan.

V. Training And Information During A Designated Outbreak

A. Bard College will verbally inform all employees of the existence and location of this Plan, the circumstances it can be activated, the infectious disease standard, College policies, and employee rights under the HERO Act.

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

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

C. The training will be:

- 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);
- Appropriate in content and vocabulary to educational level, literacy, and preferred language; and
- Verbally provided in person or through electronic, telephonic, or other means.

VI. Plan Evaluations During A Designated Outbreak

The College will review and revise this 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:

Plan Revision History			
Date	Participants	Major Changes	Approved By
July 2021	Response Team Subset	Fully vaccinated campus, capacity limits & distancing restrictions lifted	Response Team Medical Group; President, Chief of Staff, VP/Dean of the College, VP for Administration, VP for Student Affairs
September 2021	Response Team Subset	Plan finalized and implemented	
Jan 2022	Response Team Subset		
July 2022	Response Team Subset		

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 this 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 College and employee regarding a potential risk of exposure are in writing, they shall be maintained by the College 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. The College will 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.

September 2021