



Community College of Vermont

COVID-19 Program and Exposure Control Plan



Community College of Vermont COVID-19 Program and Exposure Control Plan

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PURPOSE

The purpose of this program is threefold:

1. To continue to protect the health and safety of our work force and by extension their families, and
2. To develop clear guidelines for all staff, faculty, and students at CCV to decrease the risk of exposure to the COVID-19 virus within our community, and
3. To implement the **Mandatory Health and Safety Requirements for all Business, Nonprofits & Governmental Operations** as required by the Vermont Department of Health, Centers for Disease Control and Prevention (CDC) Guidelines, Vermont Occupational Safety and Health Administration (VOSHA) and The Vermont Agency for Commerce and Community Development. Using the measures provided by these agencies, our company will strive to protect the health of our employees. This program will document the measures we use to comply with the provided guidelines.

DEFINITIONS

COVID-19: COVID-19 is a respiratory disease spread from person to person. SARS-CoV-2 is the virus that causes COVID-19.

Physical Distancing: indicates that a minimum of six (6) feet is maintained between each person.

RESPONSIBILITIES

Health Officer

All businesses must have a designated Health Officer for all shifts:

- Responsible for ensuring compliance with the Executive Order and the Addenda thereto and applicable ACCD Guidance.
- This person shall have the authority to stop or modify activities to ensure work conforms with the mandatory health and safety requirements

Health Officers

CCV has 12 different centers located throughout the state. Health officers have been identified at each of our centers, and duties will rotate according to each centers daily staffing.

Bennington: 802-447-2361	Denise McLain: dcm09150@ccv.edu	Amanda Bates: alb02050@ccv.edu
Brattleboro: 802-254-6370	Jennifer Martyn: jam04161@ccv.edu	Mary Castine: mac07290@ccv.vsc.edu
Middlebury: 802-388-3032	Debra Fulton: daf06270@ccv.edu	Jennifer Stefani: jas11111@ccv.edu
Montpelier: 802-828-4060	Artie Toulis: ast05260@ccv.vsc.edu	Susan Strachan: sts07020@ccv.vsc.edu
Morrisville: 802-888-4258	Erik Zetterstrom: edz06040@ccv.edu	Mia Cronblatt: akc04020@ccv.edu
Newport: 802-334-3387	Eliza Walters: ejw03020@ccv.edu	Sarah Corrow: sec10090@ccv.edu
Rutland: 802-786-6996	Liz McClallen: emm04050@ccv.edu	
Springfield: 802-885-8360	Tricia Temple: txt12120@ccv.edu	
St. Albans: 802-524-6541	Leslie Hunt: lcr09190@ccv.edu	Magan Tsounis-Tatro: met02210@ccv.edu
St. Johnsbury: 802-748-6673	Tina Despins-Prescott: tap10110@ccv.edu	
Upper Valley: 802-295-8822	Tricia Kent: pek11140@ccv.edu	
Winooski: 802-654-0505	Christina Kelly: cme07120@ccv.edu	Tu Phuong: tp12180@ccv.edu
	Linda Lawrence: lja03100@ccv.edu	

Administrative Person – this may be the Health Officer:

Linda Lawrence, Assistant Director of Operations, in conjunction with Center Office Managers, will be responsible for the administration of our COVID-19 Exposure Control Plan, including the following:

- Assess the hazards in this workplace (see Hierarchy of Controls in this document)
- Administer and update this program as necessary
- Regularly review guidance from Agency of Commerce and Community Development (ACCD) is updated
- Review the effectiveness of this program
- Participate in any investigation of employee complaints, failure to comply with company rules
- Provide effective training reference COVID-19 and the preventive measures CCV has taken and that the employee must follow

Regional Directors and Department Managers

- Ensure that all employees follow the protective measures outline in this program
- Enforce compliance with this program using the existing corrective structure of CCV
- Ensure training for COVID-19 protections has been completed and documented in accordance to the ACCD guidance

Employees

- Follow all rules and practices implemented by CCV, including, but not necessarily limited to:
 - Participate in all trainings relative to COVID-19
 - Stay home if you are sick
 - Wash hands frequently
 - Practice Social Distancing – 6 foot minimum
 - Report to your supervisor or the Director of HR if you feel sick, have a temperature, or you have had close contact with a person suspected of having COVID-19
 - Wear protective PPE as outlined by CCV
 - Wear protective cloth mask as outlined by CCV

EXPOSURE DETERMINATION: General Information

- This information is provided from the **VOSHA's Mandatory Health and Safety Requirements for all Business, Nonprofits & Government Operation as required by the Vermont Dept of Health, CDC Guidelines and VOSHA**
<https://labor.vermont.gov/VOSHA>
- Workers that are in a medium exposure risk are:
Jobs that require frequent (i.e., more than a few minutes) and/or close (i.e., within 6 feet) contact with people who may be infected with SARS-CoV-2, but who are **not** known or suspected COVID-19 patients.

- Workers that are in a low exposure risk are:
Jobs that do not require contact with people known to be or suspected of being infected with SARS-CoV-2, nor frequent close contact with (within 6 feet) of the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

Exposure Determination for Community College of Vermont

The first step CCV has taken is to conduct a hazard assessment to determine our risk level and exposure potential. The following was determined.

High Risk Employees:

- After review of roles and responsibilities, CCV has determined there are no jobs that currently place employees in a high risk category

Medium Risk Employees:

- Any CCV employee that must frequently perform tasks in areas that require working within six (6) feet of other employees, students, or the public

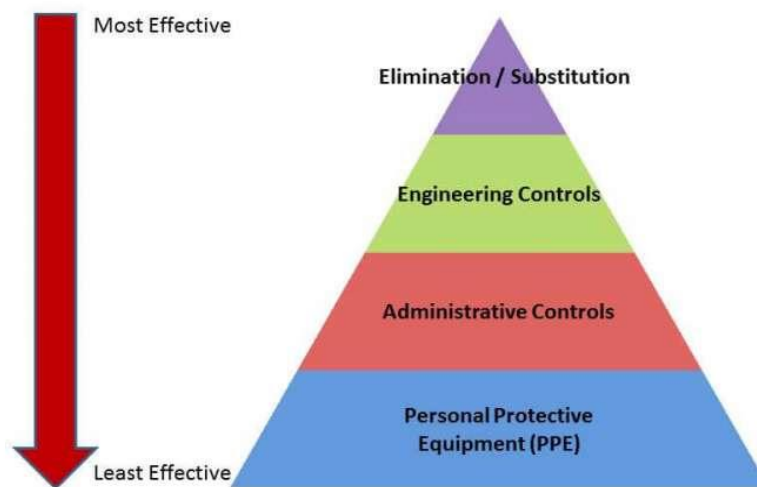
Low Risk Employees:

- Any CCV staff or faculty member that is able to perform necessary tasks either off site or on site with no requirement for close contact with other employees, students, or the public

Hazard Reduction

The Community College of Vermont understands that the most effective method for decreasing hazard for faculty, staff and students is to eliminate the risk completely. Given the nature of our mission and the programs that we offer, elimination in all areas is not possible. However, measures have been put in place to minimize risk as much as possible for all members of the CCV learning community. The following measures have been put into place:

Hierarchy of Controls



A. Elimination

1. CCV has chosen to deliver classes using online learning modalities for the spring semester
2. In order to complete the required lab/clinical/studio time for certain classes and programs the college is hosting a limited number of hybrid classes that will have some face to face learning
3. Each classroom that will be used will be assessed for "COVID-19 capacity" which will allow proper physical distancing between all individuals in the room
4. Rooms not in use will remained locked
5. Lab classes will be conducted in shifts to split up larger instructional groups into smaller groups if enrollment exceeds room capacity
6. Meetings with employees or with students will occur online or on the phone. No face-to-face meetings are to occur without prior approval from a member of President's Council
7. Most employees will continue to work remotely as appropriate by job duties and student support needs

B. Engineering Controls

The Engineering Controls that CCV has implemented are:

Offices:

- Masks must be worn over mouth and nose if within 6 feet of another person or where social distancing is difficult to maintain
- Any shared equipment (such as photocopiers) has posted disinfectant procedures and readily available cleaning products nearby
- Plexiglass guards have been placed in reception areas
- Lunch rooms are closed for gathering and eating and have posted restricted occupancy
- Employees work from individualized workstations, highly minimizing shared work areas
- Traffic flow in common higher traffic areas has been routed to avoid interactions

Computer Labs:

- Computer labs will be available to students and faculty by appointment only and have limited capacity controls
- Clear individual user cleaning requirements and directions will be posted, and readily available cleaning products provided

Classrooms and Labs:

- Maximum capacity for each classroom to be used will be identified
- Classrooms designated for use will have seating spaced six feet apart
- Instructors will be at least six feet away from students when possible
- Classrooms and labs in use will be rearranged to ensure that proper socially distanced spacing is maintained
- Tables will be wiped down before and after each class by the participants

- HVAC systems have been serviced to ensure optimal ventilation

Hallways/Common Areas:

- Furniture will be removed or blocked off to discourage group gathering

C. Administrative Controls

It is believed that Administrative Controls / Work Practice Controls can be very effective in preventing the spread of COVID-19. We have reviewed our tasks and the following Administrative Controls have been evaluated:

1. Training
2. Behavior Modification - Social distancing of 6 feet apart
 - a. Personal Cleanliness: Hand washing
 - b. Require employees to wipe down their area after use
3. Work Surface Cleanliness
 - a. Wipe down surfaces such as door push bars, shopping carts, points of sale machines, chairs in waiting areas, and other areas that customers, visitors, or workers frequently touch.
4. Employee self-monitoring: stay home if feeling ill
5. Temperature testing
6. Reducing the number of people riding in a vehicle to 2
7. Staggered work shifts, break times to reduce employee and public contact
8. Limit staff travel between multiple sites
9. Implement a safe process to receive supplies and deliveries

The Administrative Controls that CCV has implemented are:

- All staff are required to conduct daily temperature self-checks and a wellness assessment upon entering a CCV facility
- Students are required to sign a health pledge outlining all expectations and requirements
- On entry to any CCV center, students and faculty will be required to conduct a wellness assessment and temperature check
- CCV shall ask students, faculty and staff to register with [Sara Alert](#) to get daily reminders via text, email or phone from the Vermont Department of Health to check for signs and symptoms of COVID-19 upon return to campus
- The college has moved to remote learning with controlled and coordinated face-to-face labs
- No unnecessary/unauthorized travel for faculty, staff and students will be permitted
- Staff have been assigned a primary work center and should work from that location unless otherwise approved by their supervisor
- All staff have undergone VOSHA training regarding safe health practices in the workplace and COVID-19 signs and symptoms
- Hand sanitizer have been added to locations throughout each center
- Signage is posted at all entrance doors indicating that no one may enter any

building if they have signs of a respiratory illness.

- Any employee from an outside vendor that must enter will be required to wear a mask at all times

D. Personal Protective Equipment

CCV understands that the following is considered to be Personal Protective Equipment (PPE)

- Gloves
- Body Protection
- Eye/Face Protection
- Respirators
- Face Mask

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

CCV personal protective equipment readiness

- All staff, faculty and students will have access to a free and readily available mask upon entering any CCV center
- Disposable gloves will be readily available for both employee and student use in centers upon entering any CCV center
- Goggles and or face shields, in addition to masks, will be available for use by faculty and students in the face to face portions of required labs

Mandatory Requirements

The following is a list of mandatory requirements set by the state that The Community College of Vermont has met or exceeded.

A. Face Coverings:

CCV has accomplished this by the following practices:

- Face coverings are required for all staff when in the presence of others where other social distancing measures are difficult to maintain
- Face masks will be required to be worn by all employees if in a shared office when another individual is present
- All students are required to wear face coverings at all times while in classrooms/labs and in any area where social distancing is not possible
- Faculty will be required to wear a facial covering while teaching any face-to-face lab or clinical
- Plexy glass shields have been placed in areas where reception interaction is likely to ensure community safety

The person responsible for researching and accomplishing this is: Tapp Barnhill and Linda Lawrence

B. Physical Distancing of a minimum of 6 feet

No congregation of employees is allowed. Common areas (except break rooms and cafeterias) will be closed

Practices put in place for employees:

- Common areas are closed to congregation
- Employees are required to physically distance while in academic centers
- Workstations have been individualized and spread out

The person responsible researching and accomplishing this is: Linda Lawrence and Center Office Managers

C. Break Room access controlled

CCV has accomplished this by the following practices.

- Kitchen spaces will remain open for the purpose of storing food only
- Breakrooms will remain closed and staff will eat all meals in offices or outdoors
- Room occupancy levels have been determined and will be followed by all employees
- Hand sanitizer or a wash station will be available for use prior to any food preparation
- Disinfectant wipes or cleaning supplies will be located in kitchen spaces to allow for cleaning of space after kitchen use
- Signs indicating room occupancy are posted in all employee common areas

The person responsible researching and accomplishing this is: Linda Lawrence and Center Office Managers

D. Open windows and doors to promote air flow

Limit the number of people occupying a single indoor space

- COVID-19 room occupancy will be determined to identify the maximum number of people allowed in each classroom or lab that will be in use
- HVAC Systems have been serviced to promote ventilation
- Faculty primarily teach their classes remotely
- When feasible, given weather conditions in Vermont, windows and doors can be opened in an occupied and supervised location

The person responsible researching and accomplishing this is: Linda Lawrence

E. No more than 2 people shall occupy a vehicle while working and shall wear face coverings when riding together

CCV has accomplished this by the following practices.

- No more than 2 people may occupy a vehicle while working and shall wear face coverings when riding together

The person responsible researching and accomplishing this is: Tapp Barnhill

F. All common spaces and equipment, including bathrooms, frequently touched surfaces and doors, tools and equipment, and vehicles must be cleaned and disinfected at the beginning, middle and end of each shift and, when possible, prior to transfer from one person to another.

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

CCV has accomplished this by the following procedures.

Supplies:

- Sanitizer will be distributed throughout centers at the entrance of any common space
- All bathrooms will have cleaning supplies readily available. Availability will be monitored by the Office Manager or designee.
- Disinfectant wipes and hand sanitizers are to be placed in every classroom/lab that will be used during the semester

Schedule:

All high traffic and high touch areas such as doors and bathrooms will be cleaned daily by custodial services, as has been provided to them in documented expectations and standards.

Other cleaning will occur continually by each individual user and will be disinfected by the user before and after active use.

The person(s) responsible researching and accomplishing this is: Linda Lawrence / Center Office Managers

G. Employees have easy access to soap and water or hand sanitizer. Handwashing is required frequently including before entering and leaving the workplace

CCV has accomplished this by the following practices:

- Sinks with soap and water are available in every bathroom.
- Ample supply of hand sanitizer is stocked throughout the buildings to allow for easy hand hygiene.
- Signs posted in bathrooms providing a reminder and educational tool on proper procedure for frequent, effective hand washing.
- Hand sanitizer is available in every classroom and lab space that will be in use, as well as at entrances
- Students are required to sign a health contract indicating that they will be responsible with frequent hand hygiene

The person(s) responsible researching and accomplishing this is: Linda Lawrence / Center Office Managers

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

CCV has accomplished this by the following practices:

- Signs are posted at all operating entrances stating that no one may enter with symptoms of respiratory illness
- Signs are posted throughout each academic center and at entrances indicating that masks are required
- Signs are posted regarding proper handwashing procedures in all bathrooms
- Signs are posted to remind all of proper social distancing spacing

The person(s) responsible researching and accomplishing this is: Linda Lawrence / Center Office Managers

I: To the extent feasible, prior to the commencement of each work shift, prescreening or survey, including temperature checks shall be required to verify each employee has no symptoms of COVID-19. Symptoms include:

- Cough
- Shortness of breath or difficulty breathing

Or at least two of these symptoms:

- Fever ($\geq 100.4F$ or subjective fever)
- Chills
- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell

CCV has accomplished this by the following practices:

- A “check point” at each center has a digital thermometer, masks, gloves, screening questions, and cleaning supplies readily available
- Upon entry, all employees will take their temperature and answer screening questions if they have not done so at home that morning

The person(s) responsible researching and accomplishing this is: Linda Lawrence/
Center Office Managers

J. Employees shall not report to, or be allowed to remain at, work or job site if sick or symptomatic (with fever, cough, and/or shortness of breath). • Non-symptomatic COVID-19 positive workers are not allowed on site and any worker(s) who have contact with a worker or any other person who is diagnosed with COVID-19 are required to quarantine for 14 days.

CCV has accomplished this by the following practices:

- Employees have been instructed that they are not to enter any CCV workplace if they or someone they have been in close contact with have symptoms of COVID-19
- Students and faculty will be instructed that they are not to be in an academic center or attend lab/clinical if they have any symptoms of COVID-19 or someone they have been in close contact with have symptoms of COVID-19
- Students will not be permitted to return to campus until cleared to do so by a health care professional
- Absence policy has been updated to reflect the College’s desire to have students stay home in the event of illness
- Faculty must stay home and avoid campus if they are ill. Human Resources or the hiring coordinator should be notified if faculty are home due to illness

The person responsible researching and accomplishing this is: Bo Finnegan and
Heather Weinstein

Employee Training

All staff at CCV were required to complete the training as released by VOSHA and the Vermont Department of Health and submit a Certificate of Completion to the CCV Human Resources Department.

The training that was issued can be found at:

<https://labor.vermont.gov/document/protecting-safety-and-health-workers-vosha>

This training covers all of the requirements as set forth in Attachment 1, found below.

Bo Finnegan will either train, or arrange for training, in the required elements of the VOSHA COVID-19 requirements. Training will be provided at no cost to the employee and during working hours.

Training Documentation

Documentation must include the name of the employee, date of training, summary of training and the name of the trainer/s. We maintain our training records for at least (3) years or for the duration of the employment, whichever is longer.

- a. Training records required by the VOSHA standard are made available to employees, employee representatives, or to VOSHA representatives for examination and copying.

Recording COVID-19 Illnesses in the Workplace

- a. OSHA recordkeeping requirements (29 CFR Part 1904) mandate covered employer record certain injuries and illnesses on the OSHA 300 log.
- b. COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are true:
 1. The case is a confirmed case of COVID-19 (see CDC information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19)
 2. The Case is work-related (as defined by 29 CFR 1904.5) and
 3. The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (e.g. medical treatment beyond first aid, days away from work).

Additional information can be found at OSHA's Enforcement Guidance for Recording Case of COVID-19.

The person responsible researching and accomplishing this is: Bo Finnegan

Medical Records

- a. Medical records shall be maintained for at least the duration of employment plus 30 years.
- b. If the Community College of Vermont ceases to do business and there is no successor employer to receive and retain the records for the prescribed period, the

employer shall notify the Director of NIOSH, US Department of Health and Human Services, at least three months prior to their disposal and transmit them to the Director, if required by the Director to do so, within that three month period.

TRAINING PROGRAM Attachment 1

Our Training Program includes the following elements (at a minimum)

An explanation of the modes of transmission of COVID-19

A general explanation of the symptoms of COVID -19

An explanation of the modes of transmission of COVID -19

An explanation of the Community College of Vermont exposure Control Plan and the means by which employees can get a copy of the plan

Instruction on how to properly put on and take off gloves, N95's and cloth masks

An explanation on the basis for the selection of PPE

Information of how to contact someone if the employee has a temperature or does not feel well

What to do if the employee traveled to high risk areas or have been exposed to possible COVID-19 cases

Hand washing techniques

Cleaning schedules

Pre-screening before work

Attachment 2

Appendix D of Respirator Standard CFR 1910.134

Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

References: Note – requirements are continually changing. This document was prepared 5/1/2020 and revised 11/2020. Changes will occur that are not reflected in this document.

<https://accd.vermont.gov/news/update-new-work-safe-additions-stay-home-stay-safe-order>

<https://labor.vermont.gov/VOSHA>

<https://labor.vermont.gov/document/protecting-safety-and-health-workers-vosha>

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