



The purpose of this plan is to propose actions that the institution will consider in order to protect employees against exposure and disease during an airborne infectious disease outbreak. Any final actions adopted and/or updates to this plan will be determined in accordance with guidance from local, state, and federal officials and by current conditions at Union College. 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.

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. It 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. For Union College, we have chosen to extend this plan to enrolled students who live and attend classes on campus.

Please check the websites of the 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 Union College employees and students (collectively referred to as individuals in this plan), and the following work sites:

Union College owned buildings and facilities.
Union College sponsored events held at off-campus venues

This plan requires a commitment to ensure compliance with all plan elements aimed at preventing the spread of infectious disease. The following supervisory employee(s) 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
Scott Jones	Vice President for Administration and Finance	Feigenbaum Hall	518-388-6104
Liz Dobson-Davis	Director of Environmental Health and Safety	ISEC 183A	518-388-6340
Loren Rucinski	Director of Facilities Services	Facilities Services Building	518-388-6076

Individuals should report any questions or concerns with the implementation of this plan to the designated contacts.

II. EXPOSURE CONTROLS DURING A DESIGNATED OUTBREAK

A. MINIMUM CONTROLS DURING AN OUTBREAK

During an airborne infectious disease outbreak, the following controls will be considered for implementation in all areas of the campus:

- 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 coughing/sneezing etiquette;
 - Wear face coverings, gloves, and personal protective equipment (PPE), as appropriate;
 - Limit what they touch;
 - Refrain from social etiquette behaviors that can increase risk of exposure such as hugging and hand shaking, and
 - Wash hands properly and often.
- Stay at Home Policy:** If an individual develops symptoms of the infectious disease, the individual should not be in campus buildings, except for their residence. The individual 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.
- Health Screening:** The College may choose to enact a series of health screenings on a periodic basis (weekly, daily) as conditions and guidance warrant. If deemed to be necessary, the College will provide a mechanism whereby individuals will screen for symptoms of the infectious disease at their residence following the College's protocols, prior to arriving on campus or entering College buildings and should only

enter if they are feeling well. They should also self-monitor throughout their day on campus and report any new or emerging signs or symptoms of the infectious disease to the designated contact (Wicker Wellness Center for students and Human Resources for employees). Any individual showing signs or symptoms of the infectious disease should return to their residence and contact a healthcare professional for instructions. The health screening elements will follow NYSDOH and CDC guidance, if available.

4. **Face Coverings:** To protect the Union community, all individuals on campus will wear face coverings in indoor public spaces. The College may choose to allow certain areas as mask-optional (such as residence halls and private offices). Face coverings and physical distancing will be implemented 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, (for example, have features that could get caught in machinery or cause severe fogging of eyewear). 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 feasible. The College will assess our campus conditions on an ongoing basis and may choose to ask the campus community 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. Use a face covering when physical distance cannot be maintained. Use of outdoor spaces for meetings or interactions also is recommended when practical.

In situations where prolonged close contact with other individuals is likely, the following control methods may be implemented depending on conditions:

- restricting or limiting contractor 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;
 - prohibit in-person 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;
6. **Hand Hygiene:** To prevent the spread of infection, employees and students 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 shared items, door handles, tables, because hand sanitizers are less effective on soiled hands, wash hands rather than using hand sanitizer when your hands are soiled.
 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, all individuals 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 individuals, due to age, an underlying health condition, or other factors, may be at increased risk of severe illness if infected. Please inform the Wicker Wellness Center or Human Resources if you fall within this group and need an accommodation.

B. ADVANCED CONTROLS DURING AN OUTBREAK

For activities where the possible actions outlined in the Minimum Controls alone will not provide sufficient protection for individuals, additional controls from the following hierarchy may be considered. The College will determine if the following are necessary:

1. Elimination: Consider the temporary suspension or elimination of risky activities where adequate controls could not provide sufficient protection for individuals. 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: Consider appropriate controls to contain and/or remove the infectious agent, prevent the agent from spreading, or isolate individuals from the infectious agent. Examples of engineering controls include:

Mechanical Ventilation such as local exhaust ventilation, for example:

- Local duct.

General Ventilation, for example:

- Increasing the percentage of fresh air introduced into air handling systems;
- Avoiding air recirculation;
- Utilize 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
- Air purifiers.

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 facility.

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:
Bi-Polar ionization air treatment systems located in academic and administrative spaces.
Increased air exchange rates for designated spaces.
Use portable high-efficiency particulate air (HEPA) filtration systems to enhance air cleaning and upgrade to MERV-13 filters or higher, when feasible.
<i>Note to Employer: One of the best ways to reduce exposure to infectious agents is to improve ventilation. The aim is to deliver more "clean air" into an occupied area and exhaust the contaminated air to a safe location. In some cases, the air may have to be filtered before it enters the work area and/or before it is exhausted. Direct the contaminated air away from other individuals and from the building's fresh air intake ports. Consult your ventilation system's manufacturer or service company to determine if improvements are possible for your system.</i>

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.

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:
Daily Health Screening using app on mobile device may be considered. Provide weekly updates to the community via dashboard and messages on Union's designated web page. Provide training to employees and students about the components of this plan and how to implement them for their work on campus.
Evaluate the possibility of reducing capacity of classrooms and work spaces based on physical distancing.
Provide enhanced cleaning & disinfection protocols for areas occupied by infected individuals. Provide training & appropriate PPE to designated housekeeping team.
Consider conducting virtual meetings and hybrid learning or 100% remote learning during an outbreak.
Install hand hygiene practices signs in restrooms, install building entry signs with conditions for entry clearly outlined, and install signs inside campus buildings for face covering policies and steps to take if not feeling well. Install self-dispensing hand sanitizers in strategic locations inside campus 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:

PPE Required - Activity Involved/Location:
Cloth and disposable face coverings
N-95 or KN-95 respirators, gloves, coveralls and eye protection for Housekeeping staff who will be cleaning and disinfecting potentially contaminated areas.
Isolation gowns, gloves, face covering and face shield (optional) for testing center staff.
<p><i>1 The use of respiratory protection, e.g. an N95 filtering face piece 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.</i></p> <p><i>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.</i></p>

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. CLEANING & DISINFECTION DURING A DESIGNATED OUTBREAK

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 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 (see [dec.ny.gov](https://www.dec.ny.gov) and [epa.gov/pesticide-registration/selected-epa-registered-disinfectants](https://www.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 particles into the air 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.

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 on campus, take the following actions:

- Instruct the sick individual to wear a face covering and return to their residence and follow NYSDOH/CDC guidance.
- Follow local and state authority guidance to inform impacted individuals.

V. TRAINING AND INFORMATION DURING A DESIGNATED OUTBREAK

A. The 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 individuals’ 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, individuals will receive training provided by EHS that 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 individuals 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
9/7/2021	Scott Jones	Adoption of initial plan in accordance with HERO Act stipulations	David Harris
	Darcy Czajka		
	Fran'cee Brown-McClure		
	Elizabeth Dobson-Davis		
	Mark Land		
	Michele Angrist		
	Matt Malatesta		

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 individual for exercising their rights under this plan, including reporting conduct the individual 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 individual 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 individual, another individual, 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 individual may be made verbally or in writing, and without limitation to format including electronic communications. To the extent that communications between the employer and individual 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 individuals may be working.

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