



Virginia Risk Sharing Association

July 24, 2020

COVID-19 and Infectious Disease Prevention Plan



Adoption Date: July 24, 2020

Revision(s): Revision 3 dated March 2, 2021

Organization Policy

The Virginia Department of Labor and Industry (DOLI) has developed and implemented the policies set forth in Virginia Code 16 VAC 25-220. This **Permanent** Standard for preventing the infectious disease SARS-CoV-2 (otherwise known as COVID-19) is designed to prevent the spread of COVID-19 and protect Virginia's workers. VPPSA is dedicated to ensuring that our employees (full-time, part-time, and temporary) are fully protected, and can return to their families at the conclusion of their shifts. This policy sets forth the measures, policies, assessments, and enforcement measures that VPPSA will utilize to ensure the best possible outcome. Employees failing to abide by the requirements of this policy may receive disciplinary action in conformance with the employee handbook.

Should you have any questions please contact your supervisor or Tracy Hofmeyer to address any questions or concerns that you may have.

Thank you,

Virginia Peninsulas Public Service Authority (VPPSA)

Definitions

Administrative Control: Any procedures which significantly limits daily exposure to COVID-19 related to workplace hazards and job tasks by control or manipulation of the work schedule or manner in which the work is performed. Personal Protective Equipment (PPE) is not considered an administrative control.

Asymptomatic: A Person who does not have symptoms.

Close Contact: Any individual within six (6) feet of an infected person for at least fifteen (15) minutes starting from two (2) days before the person became sick until the person was isolated.

Engineering Control: The use of substitution, isolation, ventilation, and equipment modification to reduce exposure to COVID-19 related workplace hazards and job tasks.

Exposure Risk Level: Level of the possibility that an employee could be exposed to the hazards associated with COVID-19 disease which are based on risk factors present during the course of employment regardless of location. These have been broken down to “very high”, “high”, “medium”, and “lower”.

- **Very High:** Exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure to known or suspected sources of the COVID-19 including but not limited to specific medical, postmortem, or laboratory procedures. **Examples: Aerosol-generating, collecting specimens from known positive or suspected persons, and performing an autopsy.**
- **High:** Exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure with known or suspected sources of COVID-19 that are not otherwise classified as “very high”. **Examples: doctors, nurses, first responders, medical transport, mortuary services, correctional facilities, jails, detention centers, and juvenile detention centers.**
- **Medium:** Exposure risk hazards or job tasks that are not otherwise classified as very high or high and require more than minimal occupational contact with other employees or persons who may be infected with, but are not known or suspected COVID-19 carriers. **Examples: Air transportation, schools, construction settings, sports and concert venues, homeless shelter, train and bus stations, and any work performed in customer premises.**
- **Lower:** Exposure risk hazards or job tasks are those not otherwise classified as very high, high, or medium, that do not require contact with person known to be, or suspected of being, or who may be infected with COVID-19, nor contact with other employees, other persons or the general public except as otherwise provided in this definition. Lower exposure risk employees are able to achieve minimal occupational contact with others through the implementation of engineering, administrative, and work practice controls.

Face Covering: An item made of two or more layers of washable, breathable fabric that fits snugly against the sides of the face without any gaps, completely covering the nose and mouth and fitting securely under the chin. Neck gaiters made of two or more layers of washable breathable fabric or folded to make two such layers are considered acceptable face coverings. Face coverings shall not have exhalation valves or vents, which allow virus particles to escape, and shall not be made of material that makes it hard to breathe, such as vinyl. A face covering is not a surgical/medical procedure mask or respirator. (appendix, item 1)

Known to be infected: Any person, whether symptomatic or asymptomatic, who has tested positive for COVID-19, and the employer knew or with reasonable diligence should have known that the person has tested positive for COVID-19. (appendix, item 2)

Minimal occupational contact: No or very limited, brief, and infrequent contact with employees or other persons at the place of employment. Examples include, but are not limited to, remote work; employees with no more than brief contact with others inside six feet (e.g., passing another person in a hallway that does not allow physical distancing of six feet). (appendix, item 3)

Physical Distancing: Keeping space between yourself and other persons while conducting work-related activities inside and outside of the physical establishment by staying at least six (6) feet from other persons.

Symptomatic: Employee is experiencing symptoms similar to those attributed to COVID-19 including fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea. Symptoms may appear in two (2) to fourteen (14) days after exposure to the virus.

Employer and Employee Requirements

Employees are encouraged to self-monitor for signs and symptoms of suspected COVID-19 infection. These signs and symptoms may include the following: chills, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, nausea, congestion or runny nose, diarrhea, etc. (appendix, item 4) Symptoms may appear in 2 to 14 days after exposure to the virus.

Employees who are experiencing symptoms listed above are encouraged to stay home and notify a supervisor of your absence. On a case-by-case basis, if your position allows, you may be authorized to work remotely. Otherwise, normal sick leave procedures will apply as outlined in the VPPSA “Personnel Policies and Procedures” manual. This is the current plan which could be subject to change with local, state, or federal guidance.

Any organizations conducting contracting work with VPPSA is required to impress upon the contractor(s) about the importance of suspected COVID-19 contractors or temporary employees staying home. Known or suspected COVID-19 contractors or temporary workers shall not report to work or be allowed to remain on the job site until cleared to return to work.

To reduce the spread of COVID-19, employees, unless infeasible, will be required to practice physical distancing. When physical distancing is infeasible, employees will be required to ensure the use of a face covering. When employees are occupying a vehicle or equipment together the hierarchy of controls shall be considered:

- Elimination: If possible, arrange for employees to drive separately to avoid sharing work vehicles.
- Engineering Controls: Provide access to fresh air ventilation (windows). Do not circulate cabin air.
- Work Practices: Maintain six feet of distancing in vehicles where possible. Limit the number of occupants in a vehicle. Require regular/daily cleaning of vehicles between shifts.
- PPE: Utilize face coverings while occupying work vehicles or equipment with other employees or persons. (appendix, item 5)

Failure to comply with the requirements for face coverings will be considered “Failure to wear proper safety apparel and /or assigned safety equipment” as stated in the VPPSA Personnel Policies and Procedures Manual, section 7.2.1, which is a Group Two Offense. Three documented Group Two offenses of any kind in any twelve (12) month period constitute grounds for termination. (appendix, item 6)

Employees who are required to interact with customers, contractors, or the general public will be provided with, and must immediately use supplies to clean and disinfect areas where there is potential for exposure to COVID-19. All common areas (bathrooms, and other frequently touched surfaces) must be cleaned at least at the end of each shift or as determined by enhanced cleaning procedures.

The employer is responsible for notification of positive cases to the Virginia Department of Health (VDH) and DOLI when required:

- VDH will be notified within 24 hours of an employer being notified of 2 or more employees at the place of employment testing positive for SARS-CoV-2.
- DOLI will be notified within 24 hours of discovery of an employer being notified of three or more employees at the place of employment testing positive for SARS-CoV-2. (appendix, item 7)

Return to Work

If an employee of VPPSA is suspected or has tested positive for COVID-19, the following guidelines are to be followed:

If an employer (supervisor) is notified of a positive test for one of its own employees, contractors, temporary employees, or other person who was present at the place of employment within the previous two days prior to symptom onset (or positive test if the employee is asymptomatic) until 10 days after the onset (or positive test) (appendix, item 8), the employer shall notify:

- Its own employees at the same place of employment who may have been exposed within twenty-four (24) hours of discovery while keeping confidential the identity of the COVID-19 person in accordance with the Americans with Disabilities Act (ADA) and other applicable laws and regulations.
- Other employers whose employees were present at the work site during the same time period; and the building/facility owner (if different from the employer).

Return to Work Policy (appendix, item 9)

Symptomatic employees may return to work when all three of the following criteria have been met:

- The employee is fever-free (less than 100.0 degrees Fahrenheit) for at least 24 hours without the use of fever-reducing medications; and
- Respiratory symptoms (cough and shortness of breath) have improved; and
- At least 10 days have passed since symptoms first appeared

Employees known to be infected with SARS-CoV-2 who never develop signs or symptoms are excluded from returning to work until 10 days after the date of their first positive RT-PCR test for SARS-CoV-2 RNA.

Job Safety COVID-19 Analysis

Exposure	Potential Risks	Infection Protection Measures	Department/Work Class Groups
<p>Lower Exposure Risk (Caution)</p>	<p>Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with (within six (6) feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.</p>	<ul style="list-style-type: none"> • Promote frequent and thorough hand washing • provide alcohol-based hand rubs containing at least 60% alcohol • Encourage employees to stay home if they are sick • Encourage respiratory etiquette, including covering coughs and sneezes. • Take advantage of policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees. • Discourage employees from using other’s phones, desks, offices, or other work tools and equipment, when possible. • Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment. • Preferable to attend electronic meetings. 	<p>Administrative Office</p>

Exposure	Potential Risks	Infection Protection Measures	Department/Work Class Groups
<p>Medium Exposure Risk</p>	<p>Medium exposure risk jobs include those that require frequent and/or close contact with (within six (6) feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients. (Schools, sports, venues, entertainment, airports, bus and transit stations, high-population-density work environments, and some high-volume service settings).</p>	<ul style="list-style-type: none"> • Include recommend safe job procedures from lower exposure risk above. • Install physical barriers, such as clear plastic sneeze guards, where feasible. • Consider offering face masks to ill employees and customers to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home). • Keep customers informed about symptoms of COVID-19 and ask sick customers to minimize contact with workers until healthy again, such as by posting signs about COVID-19 in areas where sick customers may visit. • Where appropriate, limit customers' and the public's access to the worksite, or restrict access to only certain workplace areas. • Consider strategies to minimize face-to-face contact (e.g., curbside delivery, phone-based communication, telework). • Communicate the availability of medical screening or other employee health resources (e.g., on-site nurse; telemedicine services). • Workers with medium exposure risk may need to wear some combination of gloves, a gown, a face mask, and/or a face shield or goggles. PPE for employees in the medium exposure risk category will vary by work task, the results of the employer's hazard assessment, and the types of 	<p>Compost Facility Transfer System Convenience Center HHC Events</p>

<p>Medium Exposure Risk (cont.)</p>		<p>exposures workers have on the job.</p>	
<p>High Exposure Risk</p>	<p>High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:</p> <ul style="list-style-type: none"> • Healthcare delivery and Emergency staff (e.g., doctors, nurses, emergency response staff who must enter patients' rooms/homes) exposed to known or suspected COVID-19 patients. (Note: when such workers perform aerosol-generating procedures, their exposure risk level becomes very high.) • Medical transport workers (e.g., ambulance vehicle operators) or Law Enforcement moving known or suspected COVID-19 patients in enclosed vehicles. • Jails, detention centers, juvenile correction 	<ul style="list-style-type: none"> • Include recommend safe job procedures from Lower and Medium exposure risks above. • Post signs requesting patients and family members to immediately report symptoms of respiratory illness on arrival at any healthcare facility and use disposable face masks. • Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others at a worksite. • Encourage employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure. • Communicate procedures for employees to report when they are sick or experiencing symptoms of COVID-19. • Where appropriate, develop procedures for immediately isolating people who have signs and/or symptoms of COVID-19, and train workers to implement them. Move potentially infectious people to a location away from workers, customers, and other visitors. Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until potentially sick people can be removed from the worksite. • Take steps to limit spread of the respiratory secretions of a person who may have COVID-19. Provide a face mask, if feasible and available, and 	

<p>High Exposure Risk (cont.)</p>	<p>facilities (formerly listed as Medium Exposure Risk).</p>	<p>ask the person to wear it, if tolerated. Note: A face mask (also called a surgical mask, procedure mask, or other similar terms) on a patient or other sick person should not be confused with PPE for a worker; the mask acts to contain potentially infectious respiratory secretions at the source (i.e., the person's nose and mouth)</p> <ul style="list-style-type: none"> • Restrict the number of personnel entering isolation areas. • Consider offering enhanced medical monitoring of workers during COVID-19 outbreaks. • Provide personnel who may be exposed while working away from fixed facilities with alcohol-based hand rubs containing at least 60% alcohol for decontamination in the field. 	
<p>Very High Exposure Risk</p>	<p>Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category include:</p> <ul style="list-style-type: none"> • Healthcare workers (doctors, nurses, paramedics, emergency medical technicians) performing aerosol-generating 	<ul style="list-style-type: none"> • Include recommend safe job procedures from Lower, Medium and High exposure risks above. • Most workers at high or very high exposure risk likely need to wear gloves, a gown, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks. • Those who work closely with (either in contact with or within 6 feet of) patients known to be, or suspected of being, infected with SARS-CoV-2, the virus that causes COVID-19, should wear respirators. For the most up-to-date information, visit OSHA's COVID-19 webpage: www.osha.gov/covid-19 • PPE ensembles may vary, especially for workers who 	

	<p>procedures (e.g., intubation, cough induction procedures, bronchoscopies, or invasive specimen collection) on known or suspected COVID-19 patients.</p> <ul style="list-style-type: none"> • Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients). 	<p>may need additional protection against blood, body fluids, chemicals, and other materials to which they may be exposed. Additional PPE may include medical/surgical gowns, fluid-resistant coveralls, aprons, or other disposable or reusable protective clothing. Gowns should be large enough to cover the areas requiring protection. OSHA may also provide updated guidance for PPE use on its website: www.osha.gov/covid-19.</p>	
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Identification and Isolation of Sick/Exposed Employees

Employees are encouraged to self-monitor for signs and symptoms of suspected COVID-19 infection. These signs and symptoms may include the following: chills, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, nausea, congestion or runny nose, diarrhea, etc. (appendix, item 4) Symptoms may appear in 2 to 14 days after exposure to the virus.

Employees who are experiencing symptoms listed above are encouraged to stay home and notify a supervisor of your absence. On a case-by-case basis, if your position allows, you may be authorized to work remotely. Otherwise, normal sick leave procedures will apply as outlined in the VPPSA “Personnel Policies and Procedures” manual. This is the current plan which could be subject to change with local, state, or federal guidance.

Contingency Plan

In the event that an outbreak or pandemic due to an infectious disease, VPPSA has set up contingency plans for addressing the workplace needs as well as employee safety and health during the outbreak.

These plans are as follows:

If an outbreak occurs and VPPSA must modify operations, your supervisor(s) will contact you with pertinent information. You may be asked to work at a location that you do not normally work. Hours of operation may have to be modified to address possible staffing shortages. Any changes will be communicated to affected employees by their supervisors.

Training

VPPSA is dedicated to ensuring employee protection. This is done to ensure that employees can return home to their families safely at the conclusion of their shifts. To do that, employees must be effectively trained. Training will be accomplished as prescribed below:

- To all employees initially
- To all employees who lack understanding of the policy
- To all newly hired employees

Training will cover the information as prescribed below:

- Requirements of the VOSH COVID-19 Standard
- Mandatory and non-mandatory CDC guidelines concerning COVID-19
- Strategies to extend PPE usage during periods when supplies are not available
- COVID-19 signs and symptoms, **transmission characteristics and risk factors**
- Self-monitoring for signs and symptoms
- Employer responsibilities and return to work policy
- Cleaning and disinfecting
- Specific COVID-19 analysis for employee jobs
- VPPSA enforcement policy
- Allow for questions and answers
- Any significant updates that are incorporated in this plan

Responsible Party

VPPSA has developed this policy based on the **Permanent 16 VAC 25-220 Standard** developed by the Virginia DOLI. This policy is designed to be in place **until otherwise indicated by the Virginia DOLI**; however, this policy may be continued by VPPSA based on Federal, State, or local guidelines. The VPPSA Safety Officer and Executive Director are responsible to ensure the adoption, dissemination, and enforcement of this policy for the safety and health of the employees of VPPSA.

Appendix

(significant updates since revision 2)

Item 1: (definition) **Face Covering:** An item made of two or more layers of washable, breathable fabric that fits snugly against the sides of the face without any gaps, completely covering the nose and mouth and fitting securely under the chin. Neck gaiters made of two or more layers of washable breathable fabric or folded to make two such layers are considered acceptable face coverings. Face coverings shall not have exhalation valves or vents, which allow virus particles to escape, and shall not be made of material that makes it hard to breathe, such as vinyl. A face covering is not a surgical/medical procedure mask or respirator.

Item 2: (definition) **Known to be infected:** Any person, whether symptomatic or asymptomatic, who has tested positive for COVID-19, and the employer knew or with reasonable diligence should have known that the person has tested positive for COVID-19.

Item 3: (definition) **Minimal occupational contact:** No or very limited, brief, and infrequent contact with employees or other persons at the place of employment. Examples include, but are not limited to, remote work; employees with no more than brief contact with others inside six feet (e.g., passing another person in a hallway that does not allow physical distancing of six feet).

Item 4: (signs and symptoms of suspected COVID-19) These signs and symptoms may include the following: chills, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, nausea, congestion or runny nose, diarrhea, etc.

Item 5: When employees are occupying a vehicle or equipment together the hierarchy of controls shall be considered:

- **Elimination:** If possible, arrange for employees to drive separately to avoid sharing work vehicles.
- **Engineering Controls:** Provide access to fresh air ventilation (windows). Do not circulate cabin air.
- **Work Practices:** Maintain six feet of distancing in vehicles where possible. Limit the number of occupants in a vehicle. Require regular/daily cleaning of vehicles between shifts.
- **PPE:** Utilize face coverings while occupying work vehicles or equipment with other employees or persons.

Item 6: Failure to comply with the requirements for face coverings will be considered “Failure to wear proper safety apparel and /or assigned safety equipment” as stated in the VPPSA Personnel Policies and Procedures Manual, section 7.2.1, which is a Group Two Offense. Three documented Group Two offenses of any kind in any twelve (12) month period constitute grounds for termination.

Item 7: The employer is responsible for notification of positive cases to the Virginia Department of Health (VDH) and DOLI when required:

- VDH will be notified within 24 hours of an employer being notified of 2 or more employees at the place of employment testing positive for SARS-CoV-2.
- DOLI will be notified within 24 hours of discovery of an employer being notified of three or more employees at the place of employment testing positive for SARS-CoV-2.

Item 8: If an employer (supervisor) is notified of a positive test for one of its own employees, contractors, temporary employees, or other person who was present at the place of employment within the previous two days prior to symptom onset (or positive test if the employee is asymptomatic) until 10 days after the onset (or positive test)

Item 9: ***Return to Work Policy***

Symptomatic employees may return to work when all three of the following criteria have been met:

- The employee is fever-free (less than 100.0 degrees Fahrenheit) for at least 24 hours without the use of fever-reducing medications; and
- Respiratory symptoms (cough and shortness of breath) have improved; and
- At least 10 days have passed since symptoms first appeared

Employees known to be infected with SARS-CoV-2 who never develop signs or symptoms are excluded from returning to work until 10 days after the date of their first positive RT-PCR test for SARS-CoV-2 RNA.