| Nova Southeastern University’s **COVID-19 Plan** |
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1. **Purpose and Scope**

Nova Southeastern University is committed to providing a safe and healthy workplace for all our employees. NSU has developed the following COVID-19 plan, which includes policies and procedures to minimize the risk of transmission of COVID-19, in accordance with OSHA’s COVID-19 Emergency Temporary Standard (ETS).

NSU has multiple workplaces that are substantially similar, and therefore has developed a single COVID-19 plan for the substantially similar workplaces, with site-specific considerations included in the table below.

| **Facility Location** | **Worksite-Specific COVID-19 Considerations** |
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| Cypress Dental | This medical facility is embedded in a non-healthcare setting. Ryan White patients’ immune systems are compromised. |
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1. **Roles and Responsibilities**

NSU goal is to prevent the transmission of COVID-19 in the workplace(s). Managers as well as non-managerial employees and their representatives are all responsible for supporting, complying with, and providing recommendations to further improve this COVID-19 plan.

The COVID-19 Safety Coordinator, listed below, implements, and monitors this COVID-19 plan. The COVID-19 Safety Coordinator has Nova Southeastern University’s full support in implementing and monitoring this COVID-19 plan and has authority to ensure compliance with all aspects of this plan.

NSU and the COVID-19 Safety Coordinator will work cooperatively with non-managerial employees and their representatives to conduct a workplace-specific hazard assessment and in the development, implementation, and updating of this COVID-19 plan.

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| **COVID-19 Safety Coordinator(s)** |
| **Name** | **Title/Facility Location** | **Contact Information (office location, phone, email address)** |
| Fred Wilson | EHS Manager | Campus Support Building(954) 262-8816fwilson@nova.edu |

1. **Hazard Assessment and Worker Protections**

NSU has conducted a workplace-specific hazard assessment of its workplace(s) to determine potential workplace hazards related to COVID-19. A hazard assessment will be conducted initially and whenever changes at the workplace create a new potential risk of employee exposure to COVID-19.

NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial employees and their representatives to conduct the workplace-specific hazard assessment. All completed hazard assessment forms and results will be attached to this plan and accessed by all employees and representatives at each facility.

NSU will address the hazards identified by the assessment to minimize the risk of transmission of COVID-19 for each employee.

**Patient Screening and Management**

In settings where direct patient care is provided, NSU will:

* Limit and monitor points of entry to the setting.
* NSU Call Center prescreens all clients and patients via COVID-19 questions recommended by the CDC. Clinics prescreen suspected COVID-19 patients.
* Only patients are allowed in treatment areas, unless a minor or interpreter is needed
* Encourage telehealth services where available and appropriate to limit the number of people entering the workplace.

**Standard and Transmission-Based Precautions**

NSU has develop and implement policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC’s “[Guidelines for Isolation Precautions](https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html).” NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial employees and their representatives to develop and implement these policies and procedures.

**Personal Protective Equipment (PPE)**

NSU will provide, and ensure that employees wear, facemasks, or a higher level of respiratory protection. As part of a multi-layered infection control approach, policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA’s COVID-19 ETS.

Facemasks provided by NSU will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. NSU will provide employees with enough facemasks, which must be changed at least once a day, whenever they are soiled or damaged, and more frequently as necessary (e.g., patient care reasons). NSU will also permit employees to wear their respirator instead of a facemask and, in such cases, will comply with OSHA’s COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). Additional information about when respirator use is required can be found below.

The following are additional exceptions to Nova Southeastern University’s requirements for facemasks:

1. When an employee is alone in a room.
2. While an employee is eating and drinking at the workplace or separated from other people by a physical barrier.
3. Employees are wearing respirators following 29 CFR 1910.134 or paragraph (f) of OSHA’s COVID-19 ETS.
4. When it is vital to see a person’s mouth (e.g., communicating with an individual who is deaf or hard of hearing) and the conditions do not permit a facemask that is constructed of clear plastic (or includes a clear plastic window). When this is the case, NSU will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
5. When employees cannot wear facemasks due to a medical necessity, medical condition, or disability as defined in the Americans with Disabilities Act (42 USC 12101 et seq.), or due to religious beliefs. Exceptions will be provided for a narrow subset of persons with a disability who cannot wear a facemask or cannot safely wear a facemask because of the disability, as defined with the Americans with Disability Act (42 USC 12101 et seq.), including a person who cannot independently remove the facemask. The remaining portion of the subset who cannot wear a facemask may be exempted on a case-by-case basis as required by the Americans with Disability Act and other applicable laws. NSU will ensure that any such employee wears a face shield if their condition or disability permits it when an exception applies. NSU will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
6. When NSU has demonstrated that using a facemask presents a hazard to an employee of severe injury or death. When this is the case, NSU will ensure that each employee wears an alternative to protect the employee, such as a face shield, if the conditions permit. The employee must resume wearing a facemask when not engaged in the activity where the facemask presents a hazard.

If a face shield is required to comply with OSHA’s COVID-19 ETS or NSU otherwise requires the use of a face shield, NSU staff will ensure that face shields are cleaned at least daily and are not damaged.

NSU will not prevent any employee from voluntarily wearing their facemask or face shield in situations when they are not required unless doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.

In addition to providing, and ensuring employees wear, facemasks, NSU will provide protective clothing and equipment (e.g., respirators, gloves, gowns, goggles, face shields) to each employee following Standard and Transmission-Based Precautions in healthcare settings following CDC’s “[Guidelines for Isolation Precautions](https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html),” and ensure that the protective clothing and equipment is used in accordance with OSHA’s PPE standards (29 CFR 1910 subpart I).

For healthcare employees with exposure to people with suspected or confirmed COVID-19, NSU will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. NSU will ensure respirators are used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134), and another PPE is used in accordance with OSHA’s PPE standards (29 CFR 1910 subpart I).

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, NSU will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). NSU will also provide gloves, an isolation gown or protective clothing, and eye protection to each employee and ensure use in accordance with OSHA’s PPE standards (29 CFR 1910 subpart I).

NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial employees or representatives to assess and address COVID-19 hazards, including employee exposure to people with suspected or confirmed COVID-19.

**Aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19.**

When an AGP is performed on a person with suspected or confirmed COVID-19, NSU will:

* Provide a respirator and other PPE, as discussed in the previous section.
* Limit the number of employees present during the procedure to only those essential for patient care and procedure support.
* Clean and disinfect surfaces, equipment in the room or area where the procedure was performed and completed.

NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial employees and their representatives to assess and address COVID-19 hazards while performing AGPs.

**Physical Barriers (unless guidance changes are provided by OSHA)**

NSU has installed physical barriers at each fixed work location outside of direct patient care areas where each employee is not separated from all other people. Physical barriers are implemented, along with the other provisions required by OSHA’s COVID-19 ETS, as part of a multi-layered infection control approach.

NSU has ensured that:

* Physical barriers are solid and made from impermeable materials.
* Physical barriers are easily cleanable or disposable.
* Physical barriers are sized and located to block face-to-face pathways between individuals based on where each person would normally stand or sit.
* Physical barriers are secured so that they do not fall or shift, causing injury or creating a trip or fall hazard.
* Physical barriers do not block workspace air flow or interfere with the heating, ventilation, and air conditioning (HVAC) system operation.
* Physical barriers are transparent in cases where employees and others must see each other for safety; and
* Physical barriers do not interfere with effective communication between individuals.

**Cleaning and Disinfection**

NSU has implemented policies and procedures for cleaning, disinfection, and hand hygiene, along with the other provisions required by OSHA’s COVID-19 ETS, as part of a multi-layered infection control approach. NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial employees and their representatives to implement cleaning, disinfection, and hand hygiene in the workplace.

In-patient care areas, resident rooms, and for medical devices and equipment:

NSU follows standard practices for cleaning and disinfection of surfaces and equipment in accordance with CDC’s “[COVID-19 Infection Prevention and Control Recommendations](https://www.osha.gov/sites/default/files/CDC%27s_COVID-19_Infection_Prevention_and_Control_Recommendations.pdf)” and CDC’s “[Guidelines for Environmental Infection Control](https://www.osha.gov/sites/default/files/CDC%27s_Guidelines_for_Environmental_Infection_Control.pdf).”

In all other areas:

NSU requires cleaning high-touch surfaces and equipment multiple times a day, following manufacturers’ instructions when applying cleaners. When a room exposed to COVID-19 is reported in the clinics, a work order must be created. Custodial is notified that a proper PPE is required to sanitize and disinfect the area. Custodial will wipe down the area with Oxivir TB wipes during business hours. Medical Assistants clean every room utilizing CaviWipes after each patient.

NSU provides alcohol-based hand rub that is at least 60% alcohol or provides readily accessible handwashing facilities. In addition, signs will be posted encouraging frequent handwashing and the use of hand sanitizers.

**Ventilation**

Where NSU owns or controls buildings or structures with an existing heating ventilation, and air conditioning (HVAC) system(s) NSU has implemented policies and procedures for each facility’s heating, ventilation, and air conditioning (HVAC) system and ensures that:

* The HVAC system(s) is used in accordance with the manufacturer’s instructions and the design specifications of the HVAC system(s).
* The amount of outside air circulated through the HVAC system(s) and the number of air changes per hour are maximized to the extent appropriate.
* All air filters are rated Minimum Efficiency Reporting Value MERV 13 or higher, if compatible with the HVAC system(s); if not compatible, the filter with the highest compatible filtering efficiency is used.
* All air filters are maintained and replaced as necessary to ensure the proper function and performance of the HVAC system.
* All intake ports that provide outside air to the HVAC system(s) are cleaned, maintained, and cleared of any debris that may affect the function and performance of the HVAC system(s); and

Ventilation procedures have been implemented, along with the other provisions required by OSHA’s COVID-19 ETS, as part of a multi-layered infection control approach. NSU has identified the HVAC professional who can certify that the HVAC system(s) are operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS and list the individual(s) below.

| **The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS.** *(e.g., Maintenance staff, HVAC service contractor(s))* |
| --- |
| *Name/Contact Information:*James Marinelli (954) 262-8923 | *Location:*Campus Support Building |
| *Name/Contact Information:*Terry Watson (954) 262-8971 | *Location:*Campus Support Building |

**HVAC department will be**

* Running the HVAC system for at least 2 hours before and after the building is occupied.
* Using high-efficiency MERV-13 particulate air filters.
* Portable ionizing units.

**Health Screening and Medical Management**

Employee Notification to Employer of COVID-19 Illness or Symptoms

NSU requires employees to promptly notify their supervisor and when they have tested positive or been diagnosed or suspected of having COVID-19 by a licensed healthcare provider. If experiencing recent loss of taste or smell with no other explanation or are experiencing both fever (≥100.4° F) and new unexplained cough associated with shortness of breath.

NSU has implemented employees staying at home when they are sick, when household members are sick, or when required by a healthcare provider to isolate or quarantine themselves or a member of their household.

Medical Removal from the Workplace

NSU has implemented a policy for removing employees from the workplace in certain circumstances. NSU will immediately remove an employee from the workplace when:

* The employee is COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19).
* The employee has been told by a licensed healthcare provider that they are suspected of having COVID-19.
* The employee is experiencing loss of taste and/or smell with no other explanation; or
* The employee is experiencing a fever of at least 100.4°F and a new unexplained cough associated with shortness of breath.

The complete list of COVID-19 symptoms provided by the CDC includes additional symptoms not listed above. NSU may choose to remove or test employees with additional symptoms from the CDC list or refer the employees to a healthcare provider. [CDC Symptoms of COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html)

For employees removed because they are COVID-19 positive, NSU will keep the employee removed from the workplace for ten days after symptom onset and after resolution of fever for at least 24 hours, without the use of fever reducing medications, and with other improvement of symptoms. NSU will keep them removed until they meet the return-to-work criteria discussed below. For employees removed because they have been told by a licensed healthcare provider that they are suspected of having COVID-19 or are experiencing symptoms, as discussed above, NSU will keep them removed until ten days have passed. The employee may return when all symptoms have abated.

Any employee who tests positive or refuses a test must remain excluded from the workplace until the return-to-work criteria are met. If the employee refuses to take the test, NSU will keep the employee removed from the workplace but is not obligated to provide the medical removal protection benefits discussed below.

Any time an employee must be removed from the workplace, NSU may require the employee to work remotely or in isolation if suitable work is available. When allowing an employee to work remotely or in isolation, NSU will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent until the employee meets the return to work criteria.

NSU policies for removing employees from the workplace. [What if I have COVID-19?](https://www.nova.edu/ehs/cv19-resources/What%20If%20I%20Have%20COVID-19.html) For more information, see OSHA’s Notification, Removal, and Return to Work Flow Chart for [Employers](https://www.osha.gov/sites/default/files/COVID-19%20Healthcare%20ETS%20Notification%20Removal%20and%20Return%20to%20Work%20Flow%20Chart%20-%20Employer.pdf) and [Employees](https://www.osha.gov/sites/default/files/COVID-19%20Healthcare%20ETS%20Notification%20Removal%20and%20Return%20to%20Work%20Flow%20Chart%20-%20Worker.pdf).

NSU will not subject employees to any adverse action or deprivation of rights or benefits because of their removal from the workplace due to COVID-19.

Return to Work Criteria

NSU will only allow healthcare employees who have been removed from the workplace to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC’s “[Isolation Guidance](https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html)” and “[Return to Work Healthcare Guidance](https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html).” NSU healthcare employees may return to work after all the following are true:

* At least five days after symptom onset and after resolution of fever for at least 24 hours, without the use of fever reducing medications, , and
* Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

If an employee has severe COVID-19 or immune disease, NSU will follow the guidance of a licensed healthcare provider regarding return to work.

According to CDC guidance, asymptomatic employees may return to work after at least ten days have passed since a positive COVID-19 test or onset of symptoms. If an employer receives guidance from a healthcare provider that the employee may not return to work, they must follow that guidance.

Medical Removal Protection Benefits

NSU will continue to pay employees who have been removed from the workplace under the medical removal provisions of OSHA’s COVID-19 ETS. NSU will provide the following pay and benefits when an employee has been removed from the workplace and is notworking remotely or in isolation.

Note the following requirements under OSHA’s COVID-19 ETS:

* Employers must continue to provide the benefits to which the employee is normally entitled and pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to $1,400 per week per employee.
* The ETS also provides that the employer’s payment obligation is reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave), for earnings lost during the period of removal or any additional source of income the employee receives that is made possible by the employee’s removal.

**Vaccination**

NSU requires employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. NSU will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination. [NSU Mandatory Vaccination Program for Employees](https://www.nova.edu/hr/COVID19/Vaccination/FAQ.html).

**Training**

NSU will implement policies and procedures for healthcare employee training, along with the other provisions required by OSHA’s COVID-19 ETS, as part of a multi-layered infection control approach. NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial healthcare employees and their representatives to assess COVID-19 hazards and implement a healthcare employee training program at each facility.

Nova Southeastern University’s COVID-19 training program will be accessible in the following ways:

* Online education using KnowBe4
* Discussions with supervisors

NSU will ensure that each healthcare employee receives training, in a language and at a literacy level the employee understands, on the following topics:

* COVID-19, including:
	+ How COVID-19 is transmitted(including pre-symptomatic and asymptomatic transmission).
	+ The importance of hand hygiene to reduce the risk of spreading COVID-19 infections.
	+ Ways to reduce the risk of spreading COVID-19 through the proper covering of the nose and mouth.
	+ The signs and symptoms of COVID-19.
	+ Risk factors for severe illness; and
	+ When to seek medical attention.
* Nova Southeastern University’s policies and procedures on patient screening and management.
* Tasks and situations in the workplace that could result in COVID-19 infection.
* Workplace-specific policies and procedures to prevent the spread of COVID-19 that apply to the employee’s duties (e.g., policies on Standard and Transmission-Based Precautions, physical distancing, physical barriers, ventilation, aerosol-generating procedures).
* Employer-specific multi-employer workplace agreements related to infection control policies and procedures, the use of common areas, and the use of shared equipment that affect employees at the workplace.
* Nova Southeastern University’s policies and procedures for PPE worn to comply with OSHA’s COVID-19 ETS, including:
	+ When PPE is required for protection against COVID-19.
	+ Limitations of PPE for protection against COVID-19.
	+ How to properly put on, wear, and take off PPE.
	+ How to properly care for, store, clean, maintain, and dispose of PPE; and
	+ Any modifications to donning, doffing, cleaning, storage, maintenance, and disposal procedures needed to address COVID-19 when PPE is worn to address workplace hazards other than COVID-19.
* Workplace-specific policies and procedures for cleaning and disinfection.
* Nova Southeastern University’s policies and procedures on health screening and medical management.
* Available sick leave policies, any COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and other supportive policies and practices (e.g., telework, flexible hours).
* The identity of Nova Southeastern University’s Safety Coordinator specified in this COVID-19 plan.
* OSHA’s COVID-19 ETS; and
* How the employee can obtain copies of OSHA’s COVID-19 ETS, and any employer-specific policies and procedures developed under OSHA’s COVID-19 ETS, including this written COVID-19 plan.

NSU will ensure training is overseen or conducted by a person knowledgeable in the covered subject matter related to the employee’s job duties. Training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter to the healthcare employee’s job duties.

NSU will provide additional training whenever changes occur that affect the healthcare employee’s risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.

**Anti-Retaliation**

NSU will inform each healthcare employee that employees have a right to the protections required by OSHA’s COVID-19 ETS and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by OSHA’s COVID-19 ETS or for engaging in actions that are required by OSHA’s COVID-19 ETS.

NSU will not discharge or in any manner discriminate against any healthcare employee for exercising their right to the protections required by OSHA’s COVID-19 ETS or for engaging in actions that OSHA’s COVID-19 ETS requires.

**Requirements implemented at no cost to employees**

NSU will comply with the provisions of OSHA’s COVID-19 ETS at no cost to its employees, except for any employee self-monitoring conducted under the Health Screening and Medical Management section of this plan.

**Recordkeeping**

NSU will retain all versions of this COVID-19 plan implemented to comply with OSHA’s COVID-19 ETS while the ETS remains in effect.

NSU will establish and maintain a COVID-19 log to record each instance in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work. The COVID-19 log will contain, for each instance, the employee’s name, one form of contact information, occupation, the location where the employee worked, the date of the employee’s last day at the workplace, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.

NSU will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. NSU will maintain the COVID-19 log as a confidential medical record and not disclose it except as required by OSHA’s COVID-19 ETS or other federal law.

NSU will maintain and preserve the COVID-19 log while OSHA’s COVID-19 ETS remains in effect.

By the end of the next business day after a request, NSU will provide, for examination and copying:

* All versions of the written COVID-19 plan to all the following: any employees, their representatives, and their authorized representatives.
* The COVID-19 log entry for a particular employee to that employee and anyone having written authorized consent of that employee.
* A version of the COVID-19 log that removes the names of employees, contact information, and occupation and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee’s positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all of the following: any employees, their potential representatives, and their authorized representatives.
* All records required to be maintained by this section to the Assistant Secretary.

**Reporting**

NSU will report to OSHA:

* Each work-related COVID-19 fatality within 8 hours of NSU learning about the fatality.
* Each work-related COVID-19 in-patient hospitalization within 24 hours of NSU learning about the in-patient hospitalization.
1. **Monitoring Effectiveness**

NSU and the COVID-19 Safety Coordinator will work collaboratively with non-managerial employees and their representatives to monitor the effectiveness of this COVID-19 plan to ensure ongoing progress and efficacy.

NSU will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

1. **Coordination with Other Employers**

NSU will communicate this COVID-19 plan with all other employers who share the same worksite and coordinate with each employer to ensure that all workers are protected. NSU will adjust this COVID-19 plan to address any hazards presented by employees of other employers at the worksite.

NSU has identified below all other employers to coordinate with to ensure employees are protected.

| **Other Worksite Employers** |
| --- |
| **NSU / Employer Representative:** | **Contact Information:** |
| Each offsite location will have contact information of host landlord and site clinical hazardous analysis. | Site supervisor |
|  |  |

1. **Plan Availability**

NSU has prepared and issued this COVID-19 plan on March 1, 2022.

Version 2 updated on September 28, 2022.

| **Employer Name:** | **Nova Southeastern University, Health Professions Division** |
| --- | --- |
| **Address:** | **3301 College Ave, Davie Fl, 33304** |
| **Business Owner:** | **Nova Southeastern University** |

This COVID-19 plan is available:

| X Via hard copy at each clinical location | X Posted to EHS website [www.nova.edu/ehs](http://www.nova.edu/ehs) | X Available by request.  |
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