Middlebury takes the health and safety of our employees very seriously. With the spread of the coronavirus, or COVID-19, a respiratory disease caused by the SARS-CoV-2 virus, Middlebury must remain vigilant in mitigating the outbreak. In order to be safe and maintain operations, we have developed this policy, setting out the required COVID-19 safety protocols. Middlebury’s Emergency Management Team (EMT) and Crisis Management Team (CMT) monitor the related guidance that the U.S. Centers for Disease Control and Prevention (CDC), Occupational Safety and Health Administration (OSHA), and state health officials continue to make available.

This policy applies to all faculty, staff, and student employees who are eligible to return to in-person work at any Middlebury locations, effective May 27, 2020. Faculty and staff working remotely are expected to review these requirements to prepare for returning to work at Middlebury campuses.

This policy is subject to change based on further information provided by the CDC, OSHA, and other public officials. Middlebury may also amend this policy based on operational needs.

**STEP ONE: Authorization to Return to a Middlebury Location**

As of May 27, 2020, Middlebury employees remain subject to state orders as well as Middlebury’s policy decision to work remotely, if possible, and decisions restricting the types of work that are permitted to be carried on. Employees may not return to a Middlebury location without the prior authorization of their managers. Permission to return to work will be conditioned on request by the department manager, completion of a checklist, and specific approvals from the Senior Leadership Group. See Appendix A for a flowchart to guide managers through the approval process for returning to work on-site in compliance with state orders and mandatory health and safety requirements.

**Employees who have been performing some work at a Middlebury campus since March 2020, while providing essential services, must also be authorized to continue such work and complete the steps outlined below, in compliance with this policy.**

The legal and policy requirements will govern who can work on campus, as well as how and when work can be performed. All employees must comply with this policy and any associated COVID-19 protocols. Any employee failing to do so will be asked to leave work, and failures may result in disciplinary action.

**A. Responsibilities of Managers and Supervisors**

All managers and supervisors must be familiar with this policy and be ready to answer questions from employees. Managers and supervisors must set a good example by following this policy and COVID-19 protocols at all times. This involves practicing good personal hygiene and workplace safety practices to prevent the spread of the virus. Managers and supervisors must require this same behavior from all employees.
Managers are also responsible for securing authorization from their vice president for the return of their employees to work at a Middlebury location. Human Resources and Environmental Health and Safety staff must be consulted to ensure that the work is authorized to be performed on campus and that the proper safety protocols are in place. Vice presidents and the SLG have the ultimate responsibility of approving any return to campus work plan. See Appendix A for a flowchart to guide managers through the approval process for returning to work on-site in compliance with state orders and mandatory health and safety requirements.

STEP TWO: Complete Mandatory Health Pledge

All faculty and staff are required to sign the Health Pledge that is attached as Appendix B, which includes hand hygiene, social distancing, and other best practices for all of our locations. In addition, employees must agree to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described in the Health Pledge. IF YOU HAVE ANY SYMPTOMS OF ILLNESS, YOU MAY NOT GO TO A MIDDLEBURY LOCATION. Instead, call your manager immediately; you may also wish to call your healthcare provider. Screening for symptoms, including temperature checks, may be required by law or Middlebury policy upon arrival at the workplace and prior to starting any work.

If you have a specific question about this the Health Pledge, please ask your manager or supervisor. If they cannot answer the question, please contact Human Resources or Environmental Health and Safety Office for further assistance.

STEP THREE: Complete Required Safety Training

Prior to returning to work at any Middlebury location, employees must complete a required online COVID-19 safety training and receive certification of completion. Managers must ensure that any employee authorized to return to work complete the training. Any employee who attempts to return to work without completing the training must be sent home.

STEP FOUR: At Work, Follow Campus Protective Measures

Middlebury has instituted the following protective measures at all workplaces.

A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave campus and return home.

- All in-person meetings will be limited. To the extent possible, meetings will be conducted by Zoom or other means. If in-person meetings are held, gathering in excess of state guidelines should be avoided and participants must remain at least six (6) feet apart.
• Employees must avoid physical contact with others and shall direct others (coworkers/contractors/visitors) to increase personal space to at least six (6) feet, where possible.

• Cloth face coverings must be worn over the nose and mouth when in the presence of others, including in outdoor areas where other people may be nearby, and when inside any common/public space, such as entryways, hallways, stairways, elevators, shared work areas, classrooms, and bathrooms. Employees should exit situations promptly when this standard cannot be met.

• Employees are encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group to the size permitted under state reopening guidelines.

• Employees should limit the use of coworkers’ tools and equipment. To the extent tools must be shared, Middlebury will provide cleaning and disinfecting supplies to clean tools before and after use, and prior to transfer to another person. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.

• Middlebury will divide staff into teams where possible so that work can continue effectively in the event that one of the divided teams is required to quarantine.

• As part of the division of staff, Middlebury may divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the reminder of the foreseeable future. If there is a legitimate reason for an employee to change shifts, Middlebury will have sole discretion in making that alteration.

• Employees are encouraged to minimize ride sharing. While in vehicles, employees must ensure adequate ventilation and wear cloth face coverings.

• If practicable, each employee should use/drive the same vehicle or piece of equipment every shift.

• Employees should avoid using any shared or common source of drinking water, such as a cooler, and should bring individual water bottles.

• Refer to the Middlebury College COVID-19 Exposure Control Plan for additional workplace safety precautions and mandatory state requirements.

B. Workers Entering Occupied Buildings and Homes

• Maintenance and cleaning activities within occupied homes and academic, administrative, and other buildings present unique hazards with regard to COVID-19 exposures. Everyone working within such buildings must follow any specific protocols designated for that space. Cloth face coverings must be worn when entering these spaces.

• During this work, employees must sanitize their personal work areas upon arrival, throughout the workday, and immediately before departure. Middlebury will provide cleaning and disinfecting supplies for this purpose.
• Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.

  a. Job Site Visitors

• The number of visitors at a Middlebury location will be limited to only those necessary for business operations.

• All visitors must be screened in advance of arriving on the job site by the department who invited/hired them, using the questions below. If the visitor answers “yes” to any of the following questions, he/she/they should not be permitted to access the workplace:

  o Have you been confirmed positive for COVID-19?
  o Are you currently experiencing, or have you recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
  o Have you been in close contact with any persons who have been confirmed positive for COVID-19?
  o Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?

• Site deliveries will be permitted but should be properly coordinated in line with Middlebury’s minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

D. Personal Protective Equipment and Work Practice Controls

• Middlebury has additional safety protocols and training programs related to use of PPE. The COVID-19 Exposure Control Plan identifies specific positions and job tasks requiring PPE use for those in close contact with a person who is positive for COVID-19 or quarantined for suspected exposure.

• NOTE: The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Nevertheless, employees must wear N95 respirators if required by the work and if available.

E. Job Site Cleaning and Disinfecting

Middlebury has instituted regular cleaning practices, which include custodial services support as well as departments assigning responsibility for disinfecting shared equipment, tools, commons spaces, and work areas. In addition, employees are required to disinfect their work space during the day pursuant to their department’s specific exposure prevention plan.

I. Site Specific Protocols

There are certain job sites that are subject to additional requirements, to ensure practices that are consistent with OSHA and the CDC preventative guidance for all workers, regardless of exposure risk.
Employees may access the most up-to-date site-specific protocols in compliance with OSHA and CDC guidelines at Middlebury’s COVID-19 web page: go.middlebury.edu/covid19.

II. Confidentiality/Privacy

Middlebury respects the privacy of its employees and strives to ensure a high level of security for information it requires for safe operation. Employees may need to share certain health information in order to ensure Middlebury can comply with state safety protocols, and such disclosures of health information (like information about disabilities or medically required leaves) are essential to the employment relationship at this time. Middlebury will limit sharing of information to staff with legitimate business needs for the information and will strive to limit the information disclosed to the minimum necessary. However, in this unprecedented public health emergency, Middlebury must comply with legal requirements to report information and will require employees to permit sharing of information necessary to protect others in the workplace. Middlebury reserves the right to inform other individuals, such as coworkers or visitors, that an individual has been diagnosed with COVID-19, consistent with public health recommendations to protect the health of all members of our community. Employees are expected to keep confidential information shared by Middlebury about other individuals’ health.

III. Modifications and Questions about this Policy

Given the fast-developing nature of the COVID-19 outbreak, Middlebury may modify this policy on a case-by-case basis. If you have any questions concerning this policy, please contact Human Resources or the Environmental Health and Safety Office for assistance.
Appendix A – Approval Process for Return to Work (RTW) On-Site

START: Dept Manager considering employees to RTW on-site at a Middlebury location

- Can this work be performed remotely?
  - Yes
  - No
    - Is the work activity allowed per state order?
      - Yes
      - No
        - Can mandatory health/safety requirements be met?
          - Yes
          - No
            - VP/SLG Approval for RTW on-site?
              - Yes
              - No
                - On-site work not approved; review work plan with department manager
                  - Department conducts on the job training for employees upon return to work and ensures ongoing compliance
                    - Department implements necessary control measures in work areas per COVID-19 Exposure Control Plan
                      - Yes
                      - No
                        - Approval received?
                          - Yes
                          - No
                            - Manager submits work plan and Dept Exposure Prevention Checklist to Human Resources/Environmental Health Safety Office for review/approval
                              - Employees complete mandatory COVID-19 Training and Health Pledge
                                - Manager develops plan to comply with COVID-19 Exposure Control Plan
                                  - Yes