COVID-19 Hazard Analysis and PPE Assessment  
*Updated January 7, 2022 by Middlebury Environmental Health and Safety Office*

This document provides a hazard analysis and PPE assessment for employees who may have exposure to individuals with suspected or confirmed COVID-19.  
- When respiratory protection (N95 or PAPR) is required, employees must be enrolled in Middlebury's Respiratory Protection Program per OSHA 29 CFR 1910.134.  
- When respiratory protection use is voluntary, employees must be provided training on voluntary use of N95 respirators.  
- For other employees, general information about COVID-19 safety is found in the Working on Campus portion of Middlebury’s Campus Guide.

<table>
<thead>
<tr>
<th>Description of Job Task</th>
<th>Employees Involved and Expected Location(s)</th>
<th>Exposure Control Measures</th>
<th>Personal Protective Equipment (PPE)</th>
</tr>
</thead>
</table>
| Providing direct care to students with suspected or confirmed COVID-19 | **Health Services**  
Possible locations:  
- Health Services  
- Isolation and quarantine housing  
- Residential locations where students are recovering in place | Refer to Health Services protocols | N95 respirator or PAPR (PAPR recommended for aerosol generating procedures\(^1\))  
Gloves  
Isolation gown  
Face shield |
| Symptomatic testing for students with suspected COVID-19 | **Health Services**, **Testing center staff**  
Possible locations:  
- Health Services  
- Virtue symptomatic testing center | Physical distancing  
Plexiglass barriers at check-in stations  
Ventilation  
Required PPE for employees | Check-in and support staff:  
Voluntary use of N95 respirators or well-fitted face coverings that meet CDC guidance  
Medical observers:  
N95 respirator  
Gloves  
Isolation gown  
Face shield |
| Responding to medical emergency involving COVID-19 positive student | **Public Safety**, **Student Affairs**  
Possible locations:  
- Isolation and quarantine housing  
- Residential locations where students are recovering in place | Required PPE | N95 respirator or PAPR (PAPR recommended for aerosol generating procedures\(^1\))  
Gloves  
Isolation gown  
Face shield |
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| Providing services or performing work in a location with possible exposure\(^2\) to students with COVID-19 | **Public Safety**  
**Student Affairs**  
**Custodial Services**  
**Facilities Services**  
**Dining delivery team**  
**Other support staff or visitors (contractors, emergency services) who enter residential buildings** | Department protocols must minimize contact between students and employees  
Examples: postpone non-essential work, schedule when student is not present, close/limit access to areas where work is performed. | When department exposure controls measures are adequate to reduce exposure:  
Voluntary use of N95 respirators or well-fitted face coverings that meet CDC guidance  
When exposure\(^2\) to students with COVID-19 cannot be avoided, use required PPE:  
N95 respirator or PAPR  
Other PPE may be added based on specific task:  
Gloves  
Isolation gown  
Face shield |
| Providing transportation for COVID-19 positive student  
NOTE: Students required to wear a well-fitted face covering at all times during transport | **Public Safety staff or other staff assigned as transport drivers** | Strict physical distancing of six feet and vehicle windows open at least two inches | If exposure control methods are adequate:  
- Voluntary use of N95 respirators or well-fitted face coverings that meet CDC guidance  
If six foot distancing cannot be maintained and vehicle windows are not open:  
- Required PPE: N95 respirator |

\(^1\)For aerosol generating procedures (AGPs) performed on a person with suspected or confirmed COVID-19, OSHA encourages employers to select elastomeric respirators or PAPRs instead of filtering facepiece respirators.  
\(^2\)OSHA defines “exposure” as “close proximity, which includes being within 6 feet of or in the same room as a person with suspected or confirmed COVID-19”. Staff performing brief tasks that do not include any exposure to COVID-19 positive students, such as delivery of meals or other items to students who are isolating, would not be required to wear respiratory PPE.