

# COMMUNICABLE DISEASES POLICY & REPORTING PROCESS

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## GENERAL SUMMARY

The University is committed to providing its employees, visitors, students and contractors with a safe working environment that is free of health hazards, inclusive of communicable diseases during a pandemic. USAHS assigns the highest priority to assessing, minimizing, and managing the risks to the broader community of being exposed to pandemic diseases.

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## POLICY

The University of St. Augustine for Health Sciences (USAHS) strives to provide a safe and healthy workplace for all employees. This policy outlines specific steps USAHS takes to safeguard employees' health and well-being during a pandemic while ensuring our ability to maintain essential operations and continue providing essential services to our students and constituents. In addition, it provides guidance on how we intend to respond to specific operational and human resource issues in the event of a pandemic and specifically in the case of a communicable disease outbreak.

USAHS's decisions involving persons who have communicable diseases shall be based on current and well-informed medical judgments concerning the disease, the risks of transmitting the illness to others, the symptoms and special circumstances of each individual who has a communicable disease, and a careful weighing of the identified risks and the available alternative for responding to an employee with a communicable disease.

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## PANDEMIC DEFINED

According to the federal Centers for Disease Control, the Occupational Safety and Health Administration, and other organizations that monitor public health threats, SARS-CoV-2 virus, influenza or flu is caused by a variety of viruses. These viruses can cause different diseases: avian (or bird) flu, H1N1 (swine flu), pandemic influenza, seasonal flu, and Coronavirus Disease 2019 (COVID-19).

COVID-19 is a respiratory disease caused by the SARS-CoV-2 virus. It has spread from China to many other countries around the world, including the United States. The World Health Organization has deemed COVID-19 to be a pandemic affecting all aspects of daily life, including travel, trade, tourism, food supplies, and financial markets. The more people who become contagious, the more widespread the disease becomes and the more rapid the spread is. For the purposes of this Policy, the viruses referenced above, to the extent they are the result of an epidemic that has spread over several countries or continents affecting a large number of the population are a "Pandemic."

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## COMMUNICABLE DISEASES DEFINED

Communicable diseases include, but are not limited to, measles, influenza, viral hepatitis-A (infectious hepatitis), viral hepatitis-B (serum hepatitis), human immunodeficiency virus (HIV infection), AIDS, AIDS-Related Complex (ARC), leprosy, Severe Acute Respiratory Syndrome (SARS), including the SARS-CoV-2 (coronavirus), COVID-19, and tuberculosis. USAHS may choose to broaden this definition within its best interest and in accordance with information received through the Centers for Disease Control and Prevention (CDC).

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## ANTI-DISCRIMINATION STATEMENT

USAHS will not discriminate against any job applicant or employee based on the individual having a communicable disease. Applicants and employees shall not be denied access to the workplace solely on the grounds that they have a communicable disease. USAHS reserves the right to exclude a person with a communicable disease from the workplace facilities, programs and functions if the organization finds that, based on a medical determination, such restriction is necessary for the welfare of the person who has the communicable disease and/or the welfare of others within the workplace.

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## PRIVACY

USAHS will comply with all applicable statutes and regulations that protect the privacy of persons who have a communicable disease. Every effort will be made to ensure procedurally sufficient safeguards to maintain the personal confidence about persons who have communicable diseases.

Our policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.

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## REPORTING REQUIREMENTS AND RESPONSE PROCEDURE

### **Step 1: Notification**

Human Resources must be notified immediately of a communicable disease risk that may exist in the workplace to limit additional exposure at [reentry@usa.edu/855-GOUSAHS](mailto:reentry@usa.edu/855-GOUSAHS). Reporting is required by supervisors, the infected employee and other employees who are made aware of a communicable disease impacting the workplace. Employee's medical information, as well as information on any accommodations or leaves, will remain confidential. USAHS will comply with federal, state or local regulations such as OSHA or to the local health department regarding reporting communicable disease.

## **Step 2: Understanding the Disease and Resources**

USAHS will review the information provided and respond appropriately and consider the particular facts regarding the contagion including how the disease is transmitted, probability of transmission and complications, and duration of risk based on guidance from the Centers for Disease Control and Prevention (CDC), OSHA, state and local health departments.

## **Step 3: Identifying Scope of Risk**

USAHS will determine who is at risk for contracting the illness in the workplace and consider any possible contacts, including those outside of the office or campus that is within employer control. Possible contacts include clients, the public or vendors that may have been exposed or infected. USAHS will review how many people may be affected and how the disease is contracted.

## **Step 4: Worksite Response**

Based on a comprehensive disease research, management will review information to determine the severity and implement decisions such as an emergency shutdown, or if a limited threat, a review of a department or single area, and other response protocols as applicable to minimize contagion in the workplace. A confidential record of all incidents will be kept on file.

## **Step 5: Communication**

USAHS communications will be released as appropriate via official communication channels to include all internal or external contact and notification to employees, the public, vendors and clients as well as any communications with family members of anyone hurt on the job or hospitalized as a result of a communicable disease.

General notice will be provided to impacted individuals while preserving confidentiality and privacy of individuals involved as appropriate to allow employees to monitor themselves for symptoms and seek treatment if needed.

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### COMMUNICABLE DISEASES WORKPLACE CONTROLS

USAHS will take proactive steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of USAHS during any such time period to strive to operate effectively and ensure that all essential services are continuously provided and that employees are safe within the workplace.

USAHS is committed to providing authoritative information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak.

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### PREVENTING THE SPREAD OF INFECTION IN THE WORKPLACE

USAHS will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as bathrooms, break rooms, conference rooms, door handles and railings. A case management team will be designated to monitor and coordinate events around an infectious disease outbreak, as well as to create work rules that could be implemented to promote safety through infection control.

We ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace. The best strategy remains the most obvious—frequent hand washing with warm, soapy water; covering your mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets. We will also install alcohol-based hand sanitizers throughout the workplace and in common areas.

Unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans. For example, employees might want to arrange for alternative sources of childcare should schools close and/or speak with supervisors about the potential to work from home temporarily or on an alternative work schedule.

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#### STAYING HOME WHEN ILL

Often employees report to work even though they feel ill. We provide paid sick time and other benefits to compensate employees who are unable to work due to illness, including extended sick pay during times of pandemics, such as COVID-19.

During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: Examples include fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills and fatigue. Currently, the Centers for Disease Control and Prevention recommends that people with an infectious illness such as the seasonal flu remain at home until at least 24 hours after they are free of fever (100 degrees F or 37.8 degrees C) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.

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#### REQUESTS FOR MEDICAL INFORMATION AND/OR DOCUMENTATION

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought, in conjunction with regulatory compliance.

In the event of an infectious disease outbreak, USAHS may implement these social distancing guidelines to minimize the spread of the disease among the staff.

**During the workday while on campus, employees are required to:**

1. Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail or instant messaging to conduct business as much as possible, even when participants are in the same building.
2. If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least one yard from each other if possible; avoid person-to-person contact such as shaking hands.
3. Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
4. Do not congregate in work rooms, pantries, copier rooms or other areas where people socialize.
5. Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants).
6. Encourage members and others to request information and orders via phone and e-mail in order to minimize person-to-person contact. Have the orders, materials and information ready for fast pick-up or delivery.
7. Wear personal protective equipment (PPE) such as face/surgical masks, including as required in the labs (ex: face shields, gloves, etc.), as applicable.

**Outside activities, employees might be encouraged to the extent possible to:**

1. Avoid public transportation (walk, cycle, drive a car) or go early or late to avoid rush-hour crowding on public transportation.
2. Avoid recreational or other leisure classes, meetings, activities, etc., where employees might come into contact with contagious people.