

Communicable Diseases Policy

Date Approved: 03/04/20 Date Revised:

Category/Policy #: 3.0 Responsible Office: Administration and Governance

Policy Categories: 1.0 – Academic Programs; 2.0 – Operations; 3.0 – Administration and Governance; 4.0 Students and Student Affairs; 5.0 – Utah Campus Specific; 6.0 – Committees and Councils; 7.0 – Archived Policies; 8.0 – Forms

Policy Statement:

This Policy sets forth the principles Rocky Vista University (hereafter referred to as RVU), will follow to protect students, faculty and staff, whenever possible, from exposure to certain communicable illnesses. In appropriate situations, aspects of this policy will apply university-wide. Clinical guidance relevant to specific communicable illnesses, will be arranged by health officials, including those designated by RVU's President and CEO. This policy serves as guidance only and may change as needs, facts and guidance changes in relation to specific communicable diseases.

It is the policy of RVU to review, evaluate, and respond on an individual case-by-case basis, when possible, to any known suspected or confirmed instances of certain communicable illnesses among members of the RVU community which may be transmitted in a normal business or academic setting. Such individual review, evaluation, and response should take into consideration applicable federal and state laws; the recommendations of the U.S. Public Health Service, the Centers for Disease Control, Local and State Health Departments, the American Osteopathic Association, and various professional associations; other relevant medical, scientific, and legal literature; the expressed desires and opinions of the individual with such illness and the individual's personal physician; and the university's commitment to the protection, to the extent possible, of both public health and individual rights.

RVU recognizes that employees and students with any suspected or confirmed communicable illness may wish to continue their employment or enrollment. As long as they are able to meet acceptable performance standards, comply otherwise with all other required health regulations which describe mandatory screenings and vaccinations, and the medical evidence indicates that their conditions are not a threat to themselves or others, it is the policy of RVU that these employees and students be treated consistently with other employees and students in these matters. All members of the RVU community will be evaluated on a case-by-case basis, when possible, to determine what if any restrictions apply, given the type of illness, the individual's health status, and the nature of the work or educational setting, among other relevant factors.

In the situation of a large epidemic or pandemic, RVU reserves the right to determine fitness for duty and safety of any employee or student. In situations where case-by-case evaluation is not possible, broad restrictions may be implemented. (see #2 below)

Procedures and RVU's Responsibilities to Faculty, Staff and Students

RVU will address issues involving communicable illnesses in a sensitive and responsible manner, with concern for the rights and welfare of faculty, staff and students.

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Communicable Illness and Screenings. Any member of the RVU community who believes they have
contracted a communicable illness that may be transmitted to the university community or in patient care
settings should seek immediate medical evaluation and must contact the appropriate leadership as stated
below to report diagnosis of a communicable illness.

Note: The ADA defines some forms of communicable disease as a disability. A "direct threat" is a significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation for essential job function. If an individual with a disability poses a direct threat despite reasonable accommodation, he or she is not protected by the nondiscrimination provisions of the ADA.

Employees are to contact their direct supervisor, who will in turn contact and consult with the Vice President of Human Resources or Utah Campus HR Partner for further direction. If a work-related exposure to communicable disease is alleged, the employee should contact HR, as the employee may be sent to a Worker's Compensation Provider.

Students are to contact the Associate or Assistant Dean of Student Affairs, who will in turn contact and consult with the Vice President of Academic Affairs.

Students on clinical externships (rotation) are to contact their Rotation Coordinator in Clinical Education, who will in turn contact and consult with the Associate Dean and Manager of Clinical Education.

2. **During certain communicable disease outbreaks such as a large epidemic or pandemic**, it may be necessary to close RVU's operations for a specified period of time as determined by the President. All members of the RVU community may be asked to undergo health screening and/or health status reporting. Such provisions will be activated upon emergency order from the President or the President's designee based on available local or state health department and federal recommendations.

Under such emergency provisions, RVU may require individuals who travel to and from countries with active communicable illness outbreaks to report all such travel to university leadership and to undergo testing and screenings considered medically appropriate prior to leaving the visited country and then again when reentering the U.S. and returning to work, classes, or rotation sites. Some travel may be temporarily cancelled.

- 3. **Medical Care.** Individuals with suspected or confirmed communicable illnesses are encouraged to seek immediate guidance and/or medical care. Faculty, staff and students should look primarily to their personal physician for appropriate guidance and medical care or urgent care or ED setting as warranted. If exposure to a communicable disease is known to be work-related, contact should be made with the HR department for directions under Worker's Compensation. Any RVU employee or student with a suspected or confirmed communicable illness experiencing difficulty in obtaining expert medical care and/or counseling is encouraged to seek assistance from university leadership or their local or state health departments.
- 4. **Confidentiality.** RVU recognizes the importance of protecting, to the greatest extent possible, the confidentiality and privacy interests of all employees and students suspected of having or are confirmed to have a communicable illness. Accordingly, such information should be handled with the same degree of care and sensitivity as is accorded to other types of highly confidential medical information and, if applicable, in

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compliance with HIPAA and any other applicable privacy and confidentiality requirements. RVU will disclose sensitive medical information of employees and students no further than is necessary to ensure the health and safety of RVU employees, students and patients and in a manner consistent with applicable law. Appropriate licensed medical staff (to include RVU-appointed physicians, a student's physician or the employee's physician) will be solely responsible for assessing an employee or student's relevant clinical information to determine fitness for attendance or duty or identify relevant work restrictions. The results of this assessment of fitness for duty will be shared confidentially with Human Resources or the Vice President of Academic Affairs when needed to manage employment related issues or student attendance and participation in educational activities.

- 5. Reporting and Review Requirements for Certain Communicable Illnesses. Faculty, students, or staff members who know they have a communicable illness or who have a reasonable basis for believing that they have a communicable illness have an obligation to conduct themselves responsibly for their own protection and the protection of other members of the university and local community. Faculty, students, or staff members with communicable illnesses must not knowingly engage in any activity that creates a material risk of transmission to others. Decisions regarding restrictions on or modifications of employment and academic duties/activities and access to facilities or programs as a result of a communicable illness will be made on a case-by-case basis, when possible, depending on the type and nature of the communicable illness, the nature of the work or educational setting, and the risk to the health of the individual or others.
- 6. Quarantine or other required period of absence from work or student attendance. Where medically required, and/or recommended by the CDC, local or state health departments, employees and students will be expected to comply with quarantine or other such restrictions as prescribed by the university or by a public health official.

Where quarantine is imposed due to an **employee's exposure** while performing work directed by RVU, the employee will be paid regular pay and will not have sick or vacation balances reduced during the period of quarantine. FMLA and /or Worker's compensation may possibly apply during the period of quarantine.

Where quarantine is imposed due to a **student's exposure** while attending classes, clinical externships, or participating in RVU educational activities, the student will be excused from classes, clinical externships, and educational activities and allowed to make up missed assignments and required curriculum.

7. In the case of a vaccine-preventable communicable disease outbreak, employees or students who are not vaccinated and who risk possible exposure to the vaccine-preventable communicable disease in the course of their duties or attendance may be sent home until the risk of possible exposure is mitigated. In these cases, the employee will likely be required to use their vacation or sick time, and the student will need to make arrangements to make up assignments. An exception for those who declared an exemption from vaccinations by reason of a disability-related issue or immunodeficiency or religious beliefs should be discussed with personal physicians and communicated to university leadership.

Additional Resources. The following state offices and federal agencies are available to provide information and respond to questions about communicable illnesses.

www.cdc.gov https://www.colorado.gov/pacific/cdphe www.health.utah.gov

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Please check other local and state health agencies as it relates to your current location.

* Following is an Action Plan for Outbreaks of Communicable Diseases

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ACTION PLAN FOR OUTBREAKS OF COMMUNICABLE DISEASES

Plan Statement

Due to the nature of university life, emergency actions/responses regarding infectious or communicable disease rely on prevention and identification/containment/control strategies.

Objectives

The objectives of Rocky Vista University's Communicable Outbreak Preparedness Plan are to:

- Provide a safe and healthy environment in which to carry on the University's affairs during an epidemic or pandemic outbreak, so far as is reasonably practicable.
- Ensure optimal coordination, decision-making, and communication between leadership of RVU, internal departments, affiliated clinical networks, and local health authorities.
- Keep our community and families educated and informed.
- Implement measures to contain the spread of disease among the Rocky Vista University and local community.
- Safely and responsibly continue services and functions of the University during an epidemic or pandemic.
- Ensure the timely return of any interrupted university services when determined safe to do so.

What is the difference between a pandemic and an epidemic?

An epidemic is an outbreak of a disease that occurs in one or several limited areas, like a city, state, or country. Once the disease spreads beyond the borders of several countries and affects many countries across the globe, it is called a pandemic.

What does the state health department do to prepare for outbreaks of communicable diseases?

If there is a widespread, communicable disease outbreak, Colorado, Utah and every other state in the country will respond with new procedures, and many standard, time-tested disease control methods.

• The Colorado Department of Public Health and Environment (CDPHE) and the Utah Department of Health and local health agencies across the states monitor disease outbreaks in our communities by working with doctors, hospitals, laboratories, and nursing homes to

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- identify unusual numbers of people with illness.
- The state laboratories check samples from patients with illness to help identify which viruses are circulating in the state.
- CDPHE, the Utah Dept. of Health, and local public health agencies work together to plan for public health emergencies. Staffs practice policies and procedures for an epidemic or pandemic plan to better prepare for disease outbreaks.

Rocky Vista University Response Team (RVURT)

- a. **Incident Commander**: The RVU President and CEO is identified as the key person to coordinate between upper hierarchy of Local, State and Federal Government officials, Colorado and Utah campus leadership and Medforth senior leadership.
 - i. An incident command alternate should be designated to provide campus leadership when the Incident Commander is coordinating with Government and/or Medforth leadership.
- b. Medical Officers: The Medical Director at the RVU Health Clinic in CO will be central in the incident command structure to coordinate and provide guidance on key medical information. The Medical Director is placed in this role given expertise in the area of Infectious Diseases. In addition, the Vice President of the Utah campus will provide guidance at that location in consultation with the CO Medical Officer and the Incident Commander.
- c. Medical Operations Officer: The RVU Health Clinic Manager is responsible for managing operations at the RVU Health Center/Clinic and coordinating with the Medical Officer at the CO campus, liaising at an operational level with the Local, State and Federal health agencies. The VP of the Utah campus will appoint a Medical Operations Officer for that location who will work in coordination with that person.
- d. Security Representatives: The Security Managers at both campuses will coordinate safety and security aspects of the plan and serve as a key go to person in terms of helping operationalize the response plan including communication alerts as directed by the Communications Officer.
- e. **Communications Officer:** The Vice President of Enrollment Management and External Relations will act as the Communications Officer to coordinate the flow of information (especially to the RVU community and the media) working in close collaboration with the Incident Commander and the Medical Officers.

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Detailed Response Steps

The following scenarios warrant investigation as potential indicators for an epidemic or pandemic event:

- A rapidly increasing incidence (e.g. hours or days) of sickness in a normally healthy population.
- An unusual increase in the number of community members seeking medical attention, especially with fever, respiratory or gastrointestinal complaints.
- A large number of rapid hospitalizations.
- Illness which is unusual for a given population or age group.

In the event that an unusual incidence of contagious/infectious/communicable diseases or symptom clusters is identified in the RVU community, the following provisions will be implemented as appropriate:

- The Incident Commander will activate the Response Team (RVURT) and alert the Medforth leadership of the event.
- The Medical Officers will establish contact with the local hospital, Centers for Disease Control, Local and State Health agencies to gain a better understanding of the threat posed by the illness.
- The Medical Operations Officers, in coordination with campus and local Health Department leadership, will develop a more detailed response plan as directed.
- The Communications Officer will notify the local RVU community of the situation as soon as
 possible in conjunction with security and the emergency communication system.
 Communications should include instructions, warnings and precautions.
- The Security Representatives will coordinate for safety under direction of the Medical Officers and the Communications Officer. They will also coordinate with Facilities to implement enhanced cleaning, availability of hand disinfectant, face masks and monitoring of absenteeism and levels of concern.

Handling of the media

- All inquiries from the media regarding this emergency should be directed to the Communications Officer, who will coordinate with the RVURT where appropriate. All other persons should be instructed <u>not</u> to discuss the situation with external parties and should refer the matter to the Communications Officer.
- The Communications Officer should utilize appropriate resources to disseminate important information to targeted community members (i.e. emergency communication system, website, local media, bulletin boards, etc.).

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Prevention

The University will instruct and encourage all RVU personnel and students to adhere to infection preventative measures:

- Basic hygiene measures, like frequent hand washing or use of an alcohol-based hand gel, especially after using the restroom or eating food, should be practiced at all times.
- If you are sick, do not go to work or class, and minimize your contact with others. Seek appropriate medical intervention early on to protect both yourself, and others around you.
- If you exhibit signs of respiratory infection, practice cough etiquette. This means, covering your mouth/nose when coughing or sneezing, and using tissues to contain respiratory secretions (followed by tissue disposal in a waste basket and hand washing).

Identification/Containment/Control

- **Employees** who are sick with a suspected or confirmed communicable disease should stay home, seek medical treatment if necessary, and notify their supervisor immediately via phone call or email. The supervisor will then report all cases to the RVURT.
- Students in the pre-clinical years who are sick with a suspected or confirmed communicable
 disease should stay home, seek medical treatment if necessary, and report their conditions
 immediately to the Director of Pre-Clinical Education (DPCE) via phone call or email. The DCPE
 will then report all cases to the RVURT.
- Students in the clinical years who are sick with a suspected or confirmed communicable
 disease should stay home, seek medical treatment if necessary, and notify both their
 preceptor and their clinical rotations coordinator. The clinical rotations coordinator will notify
 the Associate Dean of Clinical Education immediately via phone call or email, who will then
 report all cases to the RVURT.
 - Well students on clinical externships should follow policies set in place by their preceptors and site locations governing their participation in patient care settings.
- Outbreaks of acute communicable diseases will be assessed by the RVU President/CEO, in accordance with local, state and federal health guidelines, and in consultation with physicians and RVU leadership. While specific actions/responses RVU will take once such a disease has been identified tend to be disease-specific, three different containment/control strategies will be followed:
 - Actions involving sick/symptomatic persons include—diagnostic testing, treatment, isolation, ambulatory transportation to a local hospital, and disease reporting through public health authorities/channels.
 - Actions involving those who have been in contact with sick/symptomatic persons include—diagnostic testing, medical monitoring/counseling, and treatment/isolation/ambulatory transportation as needed.

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- Actions involving the greater RVU community, (those not in direct contact with sick/symptomatic persons) include—information sharing as to the nature of the disease outbreak and specific recommended preventative actions, medical monitoring/counseling, additional cleaning and disinfection of public spaces, and others as needed.
- Outbreaks of serious communicable diseases will be managed in accordance with local, state
 and federal health guidelines. This may result in the temporary suspension of all RVU
 functions and/or access to its buildings and facilities, as well as possible suspension of travel.

(Below for Compliance Office Use Only)

Legal Review Required? Yes □No

Date Reviewed: 03/03/20