

CLARK ATLANTA UNIVERSITY

Policy 9.1.9: Infectious Disease Policy



CLARK ATLANTA UNIVERSITY		
Policy and Procedures	Subject: Infectious Disease Policy	
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Table of Contents **Page**

1.0 Policy Statement 1

2.0 Procedure Narrative1

3.0 Regulations, Mandatory Testing, and Screening.....2

4.0 Social Distancing, and Guidelines for Infectious Disease Outbreaks.....2

5.0 Confidentiality and Privacy3

6.0 Responsibilities3

7.0 Entities Affected By This Policy3

8.0 Definitions3

1.0 Policy Statement

Clark Atlanta University (the University/CAU) does not discriminate against individuals on the basis of diagnoses of any infectious diseases. Clark Atlanta University's decisions involving persons who have an infectious disease shall be based on current and well-informed medical judgments concerning the disease, the risks of transmitting the disease to others, the symptoms and special circumstances of each individual who has an infectious disease, and a careful weighing of the identified risks and the available alternatives for responding to an employee with an infectious disease.

This policy is based on information available from the Centers for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA) at the time of its development and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The University intends to implement this policy in a flexible way depending on the varying level of disease transmission in the community. As a result, this policy will likely continue to be refined. The University also may amend this policy based on operational needs.

2.0 Procedure Narrative

Clark Atlanta University ensures that employees with infectious diseases are entitled to the same rights, nondiscriminatory practices, equitable treatment, and opportunities as all other employees, assuming it does not put the campus community at risk. Depending upon the medical circumstances of each condition, the University may regularly monitor or require the monitoring of a person's medical condition by requesting statements from his or her treating physician or medical provider, or requiring medical tests or screenings.

As with other infectious diseases and conditions which may affect people associated with the University, the University is unable to guarantee that a member of the University community will not be exposed to infectious diseases. The University urges every person in the campus community to learn about the transmission of infectious diseases so he or she may take precautions determined appropriate for his or her individual circumstance.

All Clark Atlanta University employees are expected to participate in the process of reducing the transmission of infectious disease in the workplace. The best strategy remains practicing good hygiene, with the most obvious measures including frequent hand washing with warm, soapy water for at least twenty (20) seconds; covering your mouth whenever you sneeze or cough; exercising physical and/or social distancing; discarding used tissues in wastebaskets; and wearing face coverings/face shields as recommended by the CDC. The University will also communicate additional measures for reducing the transmission of infectious disease in the workplace, as needed, and will require compliance with these measures to ensure workplace safety.

It is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: fever, cough, sore throat, runny or stuffy nose, body aches, headache, and chills. Employees who report to work ill will be sent home in accordance with applicable local, state, and national health guidelines.

3.0 Regulations, Mandatory Testing, and Screenings

As permitted by the Equal Employment Opportunity Commission (EEOC), the University may, from time to time, mandate that employees submit to any medical test that is job-related and consistent with the requirements of the business. Additionally, when the University determines it is necessary to establish and implement a screening protocol to monitor the environment in which employees are working, employees will be required to undergo screening for elevated temperatures and other related symptoms immediately upon arriving at the worksite each day. These tests and screenings are designed to help the University take steps to ensure workplace safety. The guidelines for such tests and screenings are as follows:

- Testing and screenings for any infectious disease, including, but not limited to, COVID-19, will be conducted on a non-discriminatory basis
- All test results will be retained as confidential medical records according to regulations associated with the Americans with Disability Act (ADA) and the Health Insurance Portability and Accountability Act (HIPAA), and may be shared in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.
- Any screening, test or inquiry that is broader than necessary to address the potential direct threat is prohibited
- Although unlikely, it is possible that an employee could have a medical condition that could require the employer to determine whether it can provide the employee with an accommodation, such as making available an alternative testing method to the (likely nasal swab) method being used.
- Failure to follow guidelines as set forth by the University, particularly those that relate to the safety and general welfare of our students, staff and faculty, will be considered a violation of 2.4.0 the University Code of Ethical Conduct Policy Section 2.9 and will be subject to progressive disciplinary action, up to and including termination.

The University reserves the right to bar access to the worksite for any employee that refuses to cooperate with testing, screening, or safety protocols.

4.0 Social Distancing Guidelines for Infectious Disease Outbreaks

As recommended by state and local health authorities, the University may require employee compliance with a variety of social distancing measures to mitigate the risk of spreading of an infectious disease in the workplace. Such measures may include, but not be limited to, the following:

- Avoiding 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.
- If a face-to-face meeting is unavoidable, minimizing 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.

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- All employees are required to wear protective face coverings/face shields as recommended by the CDC in all public spaces while on campus property, there will be no exceptions to this directive.
 - Avoiding any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops, and training sessions.
 - Declining to congregate in work rooms, pantries, copier rooms or other areas where people socialize.
 - Bringing lunch and eating at your desk or away from others (avoid lunchrooms and crowded restaurants).
 - Encouraging members and others to request information and orders via phone and e-mail in order to minimize person-to-person contact, and having the orders, materials and information ready for fast pick-up or delivery.

5.0 Confidentiality/Privacy

Except for circumstances in which the University is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. Individual medical information may be consolidated into a data pool to track exposure and initiate protective measures for the university community. The University also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has contracted an infectious disease if they might have been exposed to the disease so those individuals may take measures to protect their own health.

6.0 Responsibilities

Any complaints relating to discrimination and/or harassment should be reported to the Office of Human Resources immediately. Complaints will be treated confidentially and promptly and will be carefully investigated. The Human Resources Department is responsible for the implementation of the University's Infectious Disease policy and the coordination of the grievance process related to this policy.

7.0 Entities Affected By This Policy

All Faculty and Staff of the University

8.0 Definitions

Infectious Disease: an infectious disease transmissible (as from person to person) by direct contact with an affected individual or the individual's discharges or by indirect means (as by a vector). Examples of Infectious (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) and any version of SARS (i.e. COVID-19), and tuberculosis. The University may choose to broaden this definition within its best interest and in accordance with information received through the CDC.