Stanford University Cal/OSHA COVID-19 Prevention Plan

Stanford University is adhering to the California Division of Occupational Safety and Health’s (Cal/OSHA) COVID-19 Emergency Action as summarized below. Stanford University has implemented a myriad of COVID-19 preventive measures which are summarized in this plan and detailed through the embedded URLs.

1. System for communicating

A summary of the university’s COVID-19 prevention plan is located here and addresses the preventative measures required in accordance with the California Department of Public Health’s (CDPH) COVID-19 Industry Guidance for Institutions of Higher Education.

- Without fear of reprisal, employees can communicate COVID-19 symptoms and potential exposures through Health Check.
- Cardinal Recovery, Health Alerts and Cardinal at Work COVID-19 Workplace Guide are portals of communication from the University to staff and students to stay up to date with campus COVID-19 prevention procedures and policies, accommodations and testing information.
- Employees are communicated with regularly regarding updates to the evolving landscape of COVID-19 on campus through Health Alerts and other direct means.

2. Identification and evaluation of COVID-19 Hazards

Stanford’s Health Check tool requires all employees working onsite to perform a symptom self-check 1-2 hours prior to arrival on campus.

- Health Check determines immediate clearance for on-site access and if additional actions are required for those experiencing symptoms or potentially exposed. Employees without Health Check clearance are not granted permission for onsite access.
- The Medical Support Team manages COVID-19 positive case response policies and procedures.

The Stanford Workplace COVID-19 Risk Matrix categorizes work risk levels and is intended to assist supervisors in determining necessary controls.

- Researchers develop and implement Standard Operating Procedures (SOPs) addressing workplace-specific COVID-19 hazards and mitigation strategies.
- In addition, EH&S is developing a checklist/toolkit for supervisors to facilitate documentation of identification, mitigation, and correction of COVID-19 hazards. This tool will be made available on Cardinal Recovery.

Indoor locations with ventilation systems have been evaluated to maximize outdoor air quantities and increase filtration efficiency. Additional information is available on Cardinal Recovery.
Environmental Health and Safety reviews applicable COVID-19 hazard and prevention orders and guidance from the State of California and local health department guidance.

3. Investigating and responding to COVID-19 cases in the workplace

Health Check facilitates the identification of positive COVID-19 employees, and the Medical Support Team and local human resources representatives assist in COVID-19 case followup including: activity evaluation, cleaning determination, notification of close contacts and potentially exposed individuals, and testing requirements.

- All personal identifying information gathered and employee medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace.
  - Unredacted information on COVID-19 cases and medical records shall be provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request. This does not apply to medical records that do not contain individually identifiable medical information or from which individually identifiable information has been removed.

4. Correction of COVID-19 hazards

Any instance of unsafe or unhealthy conditions, work practices, policies and procedures are evaluated in a timely manner based on severity of the hazard.

- Individual departments and units have designated COVID-19 Compliance Leads (CCLs) who act as liaisons for identifying and correcting issues related to reported COVID-19 hazard concerns.
- EH&S is developing a checklist/toolkit for supervisors to facilitate identification, mitigation, and correction of COVID-19 hazards. This tool will be made available on Cardinal Recovery.

5. Training and instruction

Prior to arriving on-site, all employees and students are required to complete EH&S’s online “COVID-19 Hygiene Best Practices” training course, which covers critical COVID-19 prevention information based on CDC recommendations including: social distancing, self-care, workspace cleaning and when to seek medical attention. The goal of the training is to provide a baseline set of COVID-19 prevention practices to be followed by everyone returning to campus.

Cardinal Recovery, Cardinal at Work, and Health Alerts provide information relating to applicable COVID-19 rights and benefits.
6. **Physical distancing requirements**

Stanford specific requirements on physical distancing are available on [Health Alerts](#).

The university’s Safety Ambassador program further supports physical distancing on campus with the teams’ daily presence, collection and reporting of observations to appropriate unit and department CCLs for follow-up.

7. **Face covering requirements**

Stanford specific requirements on face coverings are available on [Health Alerts](#).

Universal use of face coverings is required at all times while inside buildings, as well as outdoors when interacting with others not in one’s own household, with certain exemptions for young children, medical conditions and situations where use of a face covering creates an undue hazard.

8. **Other engineering controls, administrative controls, and personal protective equipment requirements**

Cardinal Recovery’s [Building Manager Toolkit](#) provides information, recommendations and guidelines to establish safe workspaces including: modified layouts, physical barriers, reconfiguration of communal facility spaces, enhanced cleaning and disinfecting procedures, procedures for shared equipment, methods for encouraging hand hygiene.

- Additionally, the university has implemented a “Stay Safe” program that provides signs and graphical tools promoting social distancing and indicating what activities are allowed inside facilities as well as throughout exterior campus spaces.

Building ventilation systems have been optimized and ventilation-related enhancements are in place for buildings as they are reopened. For buildings with mechanical ventilation:

- Quantity of outside air is optimized to provide the greatest volume feasible except in instances when outdoor air may cause a hazard to building occupants.
- Air filtration is optimized to provide the greatest Minimum Efficiency Reporting Value (MERV) rating possible based on the specific air handler capabilities.
- Daily operating hours are extended pre- and post-occupancy.

EH&S is developing a checklist/toolkit for supervisors to facilitate identification, mitigation, and correction of COVID-19 hazards. This tool will be made available on Cardinal Recovery.

Stanford University employs custodial services to clean and disinfect high-touch surfaces in occupied buildings, both on a routine preventive basis as well as following notice of an identified positive COVID-19 case individual. Methods follow recommended practices by the [CDC](#) and use of products listed by the [EPA List N: Disinfectants for Coronavirus (COVID-19)](#).
9. Reporting, recordkeeping, and access

Stanford University reports information about COVID-19 cases at the workplace to local health departments whenever required by law, and shall provide any related information requested by local health departments.

- Environmental Health and Safety shall immediately report any COVID-19 related serious illnesses or death of an employee to Cal/OSHA.
- Records of all COVID-19 cases and associated medical information are kept confidential. Information shared with employees have personal identifying information removed. More detailed case information is provided to authorized employee representatives as required by law.
- The university is also adhering to the notification requirements detailed in AB685, which requires the name of an employee to be disclosed to an exclusive representative in qualifying situations, including where an individual has:
  - Tested positive for COVID-19 or was diagnosed by a licensed physician as COVID-19 positive;
  - Been ordered to isolate by a public health official; or,
  - Died from COVID as determined by a public health official.

10. Exclusion of COVID-19 cases

Health Check determines immediate clearance for on-site access and if additional actions are required for those experiencing symptoms or potentially exposed. Employees without Health Check clearance are not granted permission for onsite access.

- The Cardinal at Work web page details interim policies and benefits for when a staff member suspects they are unwell.
  - Employees excluded from work due to Health Check and are otherwise able and available to work shall continue and maintain employee rights and benefits, including the employee’s right to their former job status, as if the employee had not been removed from their job. Employees may use sick leave, quarantine pay, or other applicable available leave for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by worker’s compensation.
    - These rights and benefits do not apply to any period of time during which the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19 transmission. Additionally, these rights and benefits do not apply where the SU demonstrates that the COVID-19 exposure is not work related.
These rights and benefits do not limit any applicable law, employer policy, or collective bargaining agreement that provides for greater protections.

- At the time of exclusion, employees will be provided information on rights and benefits described above.
- Employees who have not been excluded or isolated by the local health department need not be excluded by the employer, if they are temporarily reassigned to work where they do not have contact with other persons until the return to work requirements are met.

11. Return to work criteria

Health Check determines immediate clearance for on-site access and if additional actions are required for those experiencing symptoms or potentially exposed. Employees without Health Check clearance are not granted permission for onsite access.

- A negative COVID-19 test shall not be required for an employee to return to work. A Health Check clearance is required prior to returning to work.

Cardinal at Work has resources for managers and human resources staff to support the employee return to work policies and procedures.


Stanford University maintains a major and minor COVID-19 outbreaks plan which includes: COVID-19 testing plans, exclusion of COVID-19 cases from the workplace, investigation of workplace COVID-19 illness, review, hazard correction and notification to the local health department.

13. Employer-provided transportation to and from work

Stanford University maintains a plan for COVID-19 prevention in employer-provided motor vehicle transportation to and from work which includes any transportation of an employee during the course and scope of employment, provided, arranged for, or secured by Stanford.

References: