

**Blue Ridge Community College**  
**Institutional Plan for Offering In-Person Instruction and Campus Reopening**  
Addendum to Address Requirements of  
Department of Labor and Industry Standard 16VAC25-220  
August 24, 2020

On July 27, 2020, the Department of Labor and Industry (DOLI) issued a new Standard, titled “16VAC25-220, Emergency Temporary Standard, Infectious Disease Prevention: SARS-CoV-2 Virus that Causes COVID-19.” This standard includes language that provides for the Blue Ridge Community College (BRCC) re-opening plan to be the tool that determines our compliance with this new standard.

A public or private institution of higher education that has received certification from the State Council of Higher Education of Virginia that the institution’s re-opening plans are in compliance with guidance documents, whether mandatory or non-mandatory, developed by the Governor’s Office in conjunction with the Virginia Department of Health shall be considered in compliance with this standard, provided the institution operates in compliance with its certified reopening plans and the certified reopening plans provide equivalent or greater levels of employee protection than this standards.

The BRCC reopening plan has been reviewed by the State Council of Higher Education and has been found to be compliant in containing the required components of the ‘Higher Education Reopening Guidance,’ which was developed in consultation with the Virginia Department of Health. BRCC compared its re-opening plan to the DOLI standard referenced above and adds the following information to its re-opening plan to meet new requirements included in the standard above.

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BRCC has categorized job tasks for employees on campus according to applicable sections of the standard as very high, high, medium or lower risk of exposure to the SARS-CoV-2 virus. BRCC is in compliance with requirements for hazards or job tasks per each level of classification. BRCC has no hazards or job tasks on campus classified as very high or high risk. Certain in-person instructional courses are classified as medium risk. All other hazards and job tasks are classified as lower risk.

BRCC will not accept the results of Serological testing (antibody testing) in decisions about returning employees to work who were previously classified as known or suspected to be infected with SARS-CoV-2 virus.

BRCC has informed subcontractors about the importance of employees or other persons who are known or suspected to be infected with the SARS-CoV-2 virus of staying home. Ongoing

contract services at BRCC include security services, custodial services, lawn care, and bookstore operations. All contractors who have employees on campus have received this information. Any contractors performing construction or maintenance on campus have been informed or will be informed when services are contracted that require their presence on campus. Contractors have been requested to inform Ms. Cynthia Page, Vice President of Finance and Administration ([pagec@brcc.edu](mailto:pagec@brcc.edu)), 540-453-2281, if any of their employees have tested positive for SARS-CoV-2 and have been on the BRCC campus within 14 days prior to the positive test, so that BRCC may determine possible exposure to employees and follow notification procedures as described in the paragraph below. BRCC does not engage any companies that provide contract or temporary employees.

BRCC employees are requested to report positive reports of SARS-CoV-2 to their supervisors, or to Mr. Tim Nicely, Director of Human Resources ([nicelyt@brcc.edu](mailto:nicelyt@brcc.edu)) 540-453-2371. If any employee has been present on campus within the previous 14 days from the date of the positive test, BRCC will, within 24 hours of the discovery of employees' possible exposure, notify those employees who may have been exposed. BRCC will notify other employers whose employees may have been exposed during the same time period. If the exposure occurred at a leased facility, BRCC will also notify the leaseholder. The identity of the individual who tested positive will remain confidential in accordance with the requirements of the Americans with Disabilities Act (ADA) and other applicable federal and Virginia laws and regulations.

BRCC will notify the Virginia Department of Health within 24 hours of the discovery of a positive case on campus, and will notify DOLI within 24 hours of three or more employees present at the college within a 14-day period testing positive for SARS-CoV-2 virus during that 14-day time period.

BRCC will ensure each employee has access to the employee's own SARS-CoV-2 virus and COVID-19 disease-related exposure and medical records, if any, in accordance with the standards for the industry.

BRCC has adopted a symptom-based return to work strategy and a test-based return to work strategy.

- The symptom-based strategy included in the reopening plan is compliant with the DOLI standard listed above except that it is modified to state the requirement for the passage of three days with no fever which must be without the use of fever-reducing medications.
- The test-based strategy is modified to include that an employee may not return to work until 1) resolution of fever without the use of fever-reducing medications 2) improvement in respiratory symptoms (e.g. cough, shortness of breath) and 3) negative results of an FDA Emergency Use Authorized COVID-19 molecular assay for detection of SARS-CoV-2 RNA from at least two consecutive respiratory specimens collected 24 hours or more apart (total of two negative specimens).
- Return to work strategies do not apply to employees who are teleworking.

If a BRCC employee is known to be infected with SARS-CoV-2 and is asymptomatic, they may return to work based on a time-based or test-based strategy. The time-based strategy included in the reopening plan is compliant with the DOLI standard listed above. If the employee develops symptoms, then the symptom-based strategy or test-based strategy will be used. The symptom-based strategy is modified as stated in the paragraph above. The test-based strategy for asymptomatic employees is the same as described in the paragraph above. Return to work strategies do not apply to employees who are teleworking.

BRCC provides hand sanitizer and disinfectant wipes to employees for their work area and hallways. Most on-campus operations are closed, buildings are secured, and the general public is not accessing campus. However, if employees interact with customers, the general public or other persons, they are instructed to immediately clean and disinfect surfaces contacted during the interaction.