

DISTRIBUTION OF MATERIALS PROMOTING A SAFE ENVIRONMENT FOR ALL

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INTRODUCTION

The California Department of Public Health and the State of California Department of Industrial Relations (Cal/OSHA) has provided to all Institutions of Higher Education (IHE) COVID-19 Industry Guidance which states that IHEs should limit, to the greatest extent permitted by law, external community members from entering the site and using campus resources, as the number of additional people onsite and/or intermixing with students, faculty, and staff increases the risk of virus transmission. (The California Department of Public Health, 2020)

Following this guidance and understanding departments may need to distribute materials to support the mission of the University; it has been determined that a risk assessment should be completed prior to distributing any materials whether in-person or by mail. It is important to acknowledge there are still risks associated with these types of distribution. Risks can include, but are not limited to, who is distributing the materials, types of materials being distributed and how they are being distributed, the accessibility of distribution, and whether the materials being distributed are an essential need.

BACKGROUND

In March of 2020, Governor Newsom issued Executive Order N-33-20 directing all residents immediately to heed current State Public Health directives to stay home, except as needed to maintain continuity of operations of essential critical infrastructure sectors and additional sectors as the State Public Health Officer may designate as critical to protect health and well-being of all Californians. (State of California, 2020) Accordingly, the State Public Health Officer designated workers supporting public and private childcare establishments, pre-K establishments, K-12 schools, colleges, and universities for purposes of distance learning, provision of school meals, or care and supervision of minors to support essential workforce across all sectors. (State of California, 2020)

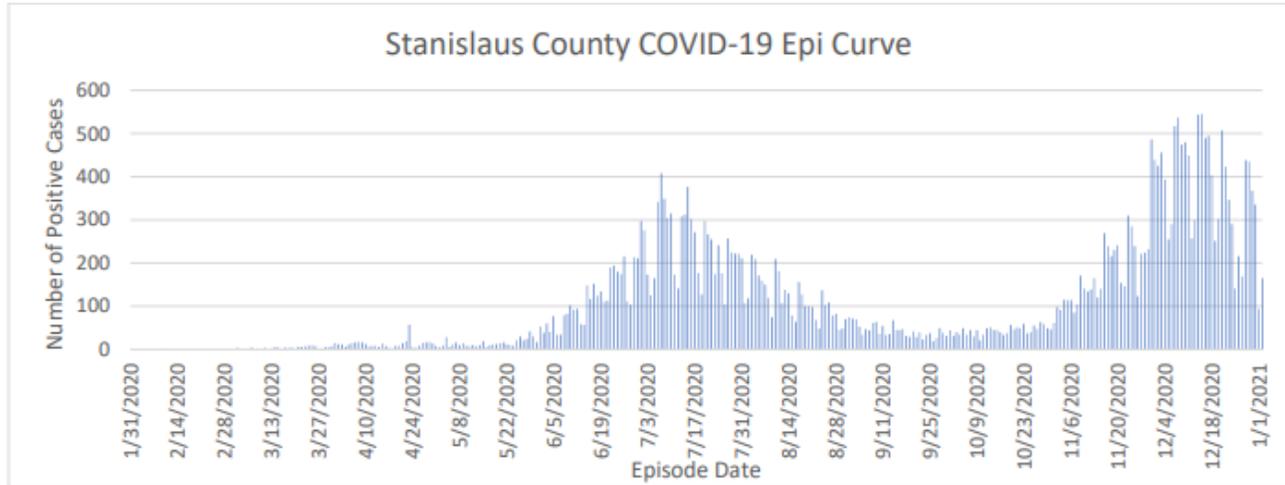
The California State University (CSU) expedited the transition of all operations – including instruction – to a virtual mode and lowered the campus population of students and employees. Campuses were instructed to significantly reduce student and employee populations including campus housing communities. Most employees transitioned to telecommuting while some employees remained to maintain essential operations. (The California State University, 2020)

Stanislaus state continued virtual operations through Summer and determined that campus operations would continue in a limited capacity, with reduced residents in housing and allow a limited number of courses to continue in a face-to-face capacity for Fall 2020.

Trends have continued to show an uptick in virus cases and are predicted to continue to rise following the holidays. Cases have risen dramatically since October and as of January 1, 2021 are still on the rise (see Graph 1: Stanislaus County COVID-19 Epi Curve below).

Graph 1: Stanislaus County COVID-19 Epi Curve

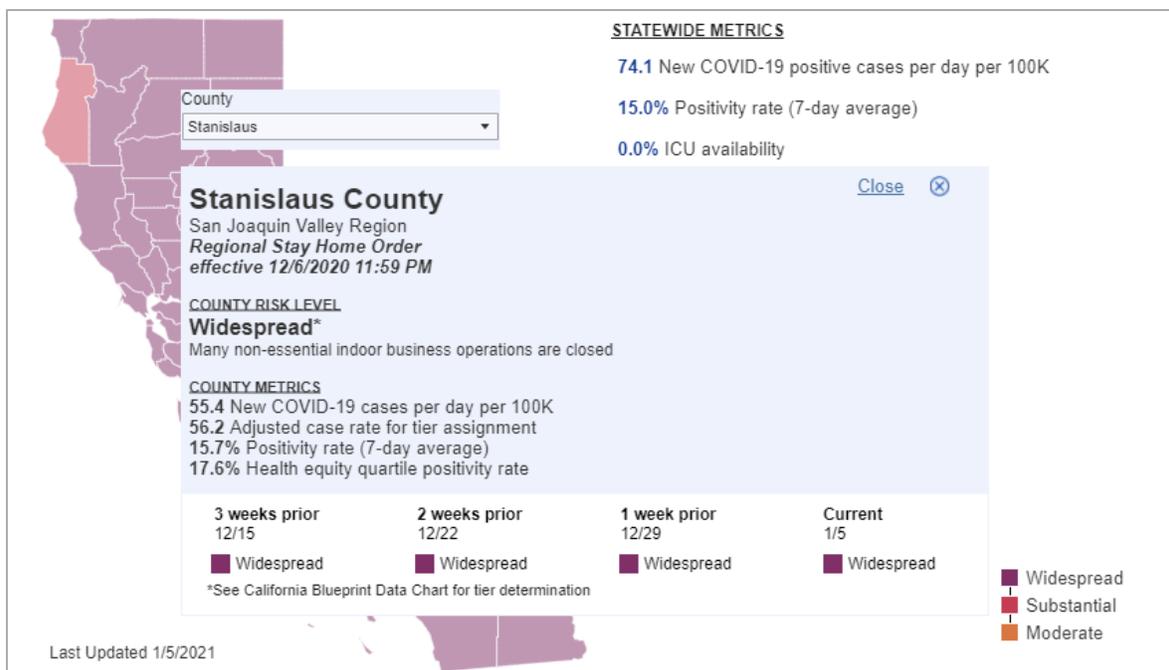
This graph shows the daily number of unique COVID-19 confirmed positive cases reported among Stanislaus County residents by the case's episode date. The episode date is the earliest date a person is known to have the virus and is determined using a few variables including symptom onset date and the date they were tested.



Note: Due to delays in specimen processing, totals for the past two weeks may be incomplete.
 Reported COVID-19 cases and deaths on this page are those that have been confirmed by Stanislaus County Public Health.

On November 19, 2020, the State of California Department of Public Health issued a Limited Stay at Home order for counties under Tier One (Purple) (See Figure 1: Statewide and County Metrics). In addition, on December 3, 2020, a Regional Stay at Home order was released in response to the increase in hospital capacity. Under this order when adult ICU beds fall below 15% certain terms apply including allowing critical infrastructure sectors to continue to operate and must continue to modify operations pursuant to the applicable sector guidance. (Erica S. Pan, 2020)

Figure 1: Statewide and County Metrics



PROBLEM

Bringing more individuals on campus goes against industry guidance, Chancellor's Office, the Center for Disease Control guidance, and the California Department of Public Health Regional Stay at Home order. Allowing individuals to gather on campus creates undue risk to campus personnel and to the students we serve. In response to the recent surge in COVID-19 cases and to reduce the risk of transmission, our campus President has asked faculty who have hybrid courses with face-to-face instruction to revert to virtual modality as well as asking her cabinet to re-evaluate the number of essential employees on campus and reduce them as much as possible. Distribution of materials without assessing the risk, has the possibility of placing everyone involved in a precarious position.

The types of materials being distributed becomes a risk based on the very nature of the material. Materials may seem 'low risk'; however, if they are not properly handled or disposed of, they can be harmful to individuals or the environment. Hazardous materials cannot be distributed if they require personal protective equipment or are considered dangerous under certain circumstances. Materials distributed in-person brings more individuals to campus when we are trying to reduce the number of persons coming to campus and can create an equity issue for students who lack transportation.

Materials being distributed must be accessible to all individuals, therefore if they cannot be distributed in person they will need to be mailed. There are certain items that may not be feasible to mail due to cost, being hazardous, or no physical location for delivery. Depending on what needs to be mailed, will also depend on who is packaging the materials. If more than one person is packaging, safety protocols must be followed, and gatherings are prohibited based on California's Blueprint for a Safer Economy tiered system.

SOLUTION

Safety & Risk Management conducts risk assessments every day to ensure the campus community is safe from injury or illness and mitigates any loss through litigation. When distributing materials, the assessment nor the risk is any different. We must look at all aspects and bring a different perspective than what others may see. We must follow guidelines and regulations put forth by the State of California including Cal/OSHA and the CSU policies and procedures.

Per emergency regulation from Cal/OSHA, Safety & Risk Management implemented risk assessments for areas/departments who had essential employees that could not work remotely. These areas were/are critical for the continuing operation of the University infrastructure. The assessments identify who is on campus and outline a safety plan to ensure the safety of our faculty, staff, and students.

The risk assessment looks at what the task is, identifying the hazards associated with those tasks, and coming up with solutions on how to mitigate those hazards. This is also known as a job hazard/safety analysis and they can be done on the smallest of jobs, such as using a hand tool, to larger widespread

activity such as distribution of materials¹. When distributing materials, we must determine if the materials are essential to the academic mission and strategic plan of the University. The importance of having input from employees to administration is key in this process. The risk assessment is a simple process: the individual who wants to distribute materials would obtain approval from their Dean or Vice President, completing the online risk assessment, and depending on what is trying to be achieved by this distribution, determining if other departments may need to be involved.

CONCLUSION

As we continue to come to understand this virus, we must continue to mitigate the impact of COVID-19 outbreak conditions within our campus community and look to ways that can help in keeping our faculty, staff and students safe. Therefore Safety & Risk Management has determined risk assessments to be a vital part of mitigating the impact of COVID-19 within our campus community.

An online distribution of materials risk assessment has been created to help guide the process. This assessment starts with the individual, department, or group determining ahead of time if the materials being distributed are essential to the academic mission and strategic plan of the University. If this determination exists, approval from the College Dean or Vice President is needed. Once the proper approval has been obtained, the online risk assessment should be completed to determine if the materials being distributed are safe for the end user to receive and use.

When completing the online risk assessment, there is certain criteria that should be considered when analyzing the materials:

1. Are there alternatives to physical distribution? For example, electronic documents or on-hand household items.
2. Are the materials hazardous? If so are there other non-hazardous materials that can be used?
3. Do the materials require personal protective equipment (PPE)? A Safety Data Sheet can determine this; if so the material cannot be distributed.
4. Does the United States Postal Service allow these types of materials to be mailed?
5. Do the materials need to be returned?

Upon submission of this assessment, Safety & Risk Management will review and provide additional guidance or recommendations. It is at this time that the activity must be entered into the 25Live Reservation system. Starting January 18, 2021, the online risk assessment can be accessed via the COVID-19 website at <https://www.csustan.edu/covid-19/risk-assessments-protection-plans>.

¹ Distribution of materials will be considered an activity and based on IHE guidance, local and state guidelines/orders and local tier, will determine additional guidance or steps (see page 19-20 of IHE document).

Works Cited

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