COVID-19 Management Policy

Effective: August 9, 2021

It is the goal of Southern New Hampshire University (SNHU) to provide a safe and healthy work environment for employees, students, vendors and the public during the COVID-19 pandemic, and to maintain essential functions. This Covid-19 Management Policy takes into consideration the Universal Best Practices (“Universal Best Practices”), effective May 7, 2021, by Governor Sununu’s Economic Reopening Task Force, as well as guidance from the U.S. Centers for Disease Control and Prevention (CDC), Equal Employment Opportunity Commission (EEOC), Occupational Safety and Health Administration (OSHA), New Hampshire Department of Health and Human Services (NH DHHS) and other state and federal agencies. Please note that this policy outlines the procedures and protocols generally applicable to employees at all SNHU locations. Additional guidance for certain business units or locations may be issued from time to time as circumstances warrant.

This policy provides information on mitigation measures already in place at the University, which are continuing, as well as new measures that apply related to the reopening of SNHU work sites. Human Resources will oversee the implementation of this policy and coordinate communications from management to employees and other stakeholders, in conjunction with the University’s COVID-19 Taskforce and Communications Team. All employees are expected to understand this policy and act in accordance with it. This policy will remain in effect until further notice. Given the fluid nature of the pandemic, it is highly likely this policy will be updated periodically and we encourage employees to regularly refer to this policy link.

SNHU reserves the right to correct, modify, revoke or supplement this policy, completely or in part, at any time, without prior notice to employees.

Safety and Health Measures

SNHU has and will continue to implement disease mitigation and protective measures for employees working on-site and offsite and for interactions with students, vendors and the public during the pandemic. SNHU is committed to providing the most current and credible information about the disease, including the manner in which it spreads, symptoms and measures to prevent its transmission. Unless provided an exemption due to disability or sincerely held religious belief, all employees are required to comply with the Safety and Health Measures outlined in this Policy. Noncompliance with this Policy may result in disciplinary action up to and including termination of employment.

COVID-19 Vaccinations. Effective September 30, 2021, SNHU employees must be fully vaccinated in order to work on-site at any SNHU location, attend on-site meetings or events, or travel on SNHU business. A person is considered “fully vaccinated” when they are at least 14 days beyond completion of a recommended COVID-19 vaccine series authorized for use in the U.S., the Pfizer-BioNTech, Moderna, and Johnson and Johnson (J&J) Janssen COVID-19 vaccines.

No later than September 30, 2021, all employees must certify their vaccination status in Workday, including uploading a copy of their vaccination card. Once completed, this will be reviewed by HR on a rolling basis and employees will receive an “approved to work onsite” designation in Workday once approved to work onsite. This designation will be visible to the employee and manager. Information about vaccination status will be treated as confidential health information as required under applicable law. Periodic re-certifications may be required. Failure of an employee to certify their vaccination status in Workday, and provide proof that they have been fully vaccinated for COVID-19 by the later of September 30, 2021 or their scheduled return to work or travel date, will be considered noncompliance with this policy.

Any employee who is required to vaccinate under this policy but unable to do so because of a health or other reason is encouraged to speak to their HRBP to discuss an alternative plan. SNHU’s disability and religious accommodation policies may apply in these situations and employees are encouraged to review these policies in the Handbook.

Most of the safety and health measures outlined in this Policy are applicable regardless of an employee’s vaccination status. However, as outlined more fully below, and in the SNHU Return to Work and Campus
Operational Plan, different procedures may apply for vaccinated and unvaccinated employees with respect to some requirements, e.g. surveillance testing.

Where outlined in this Policy, protocols for “Vaccinated Employees” may be followed by any employee that is fully vaccinated (as defined above) and has certified their vaccination status in Workday. Employees who are not fully vaccinated or who have not yet certified their vaccination status must follow protocols outlined for “Unvaccinated Employees.”

Reducing transmission. To promote a clean and safe workplace, SNHU will conduct regular cleaning of common areas/surfaces that have not been temporarily closed, such as:

- Conference rooms
- Bathrooms
- Cafeterias and break rooms
- Door handles
- Hand railings

Employees on-site will be provided with access to household cleaning products to clean their own equipment such as desks, computers, telephones etc. Cleaning should be conducted regularly and employees should follow product label/use instructions. Use of other workers’ equipment is discouraged. Shared equipment must be cleaned and disinfected between uses. To obtain cleaning supplies, please see the following:

- Campus: Facilities/Housekeeping
- Millyard: Operations Central Support Team or Team Administrative Manager
- Tucson: William Brooks, Operations Manager <w.brooks2@snhu.edu>
- Kenzie: Alyssa Miller, Director of Operations <a.miller10@snhu.edu>

Additionally, some common use areas may be closed and/or limited in order to ensure appropriate social distancing, where feasible. Please be sure to pay careful attention to site-specific posted notifications and room/building closures.

All employees and individuals who enter the workplace are advised to follow personal hygiene and other practices to prevent infection, including:

- Washing hands and using hand sanitizer frequently
- Avoiding touching of the face, eyes or mouth
- Practicing good respiratory etiquette. This includes coughing and sneezing into a tissue or your elbow rather than into your hands
- Practicing social distancing, where feasible
- Wearing disposable face masks or cloth face coverings to limit spread of the virus

Reporting exposure and staying home when ill. Protocols for reporting exposure, quarantine and isolation vary depending on an employee’s vaccination status.

All Employees must notify their supervisor, and stay home if:

- They have new or unexplained symptoms of COVID-19 – even mild symptoms. (A person who is “mildly symptomatic” usually refers to a person with one or more symptoms that are not severe enough for the person to normally stay home or seek healthcare.); or
- They are diagnosed with COVID-19;
- In addition to the above protocols, Unvaccinated Employees also must notify their supervisor and stay home if:
  - They have been in close contact with a person with COVID-19. (Close contact means having been within 6 feet for 10 minutes or longer of a person with COVID-19. The 10 minutes of contact can be at one time or cumulative over the course of the day.); and/or
  - They have a travel-related risk as defined in the NH Division of Public Health Services (NH DPHS) Employer Travel, Screening and Exclusion Guidance.

All employees also must report to Human Resources if they have been in close contact with
For all employees, entry to SNHU facilities requires employees to provide documentation of negative test results in some cases. SNHU also may request documentation from a healthcare provider before being permitted to return to work. SNHU understands that doctors and other healthcare professionals may be too busy during and immediately after an outbreak to provide such fitness-for-duty documentation. If any employee has trouble obtaining the appropriate documentation, the employee is encouraged to reach out to their Human Resource Business Partner (HRBP). Employees can find out who their HRBP is by reviewing the HRBP Team Assignments guide.

For all employees, entry to SNHU facilities may be subject to the employee satisfying the requirements of this policy, including removal of any general restrictions on-site work that may be in place at the time.
Employees may refer to the University’s Operational Guide for more information about the return to on-site work from our Pandemic-related remote work environment.

Health Screening and Surveillance Testing. Protocols for surveillance testing vary based on an employee’s work location and vaccination status. Any employee reporting on site will need to follow the testing procedures established for that location. Employees who have not yet been authorized to return to on-site work under the University’s Operational Guide should reach out to the contact below if they need to go on-site for any reason (prior to reporting on-site) and should have their manager’s approval:

The Millyard, Portsmouth, and Salem: 603-314-4827
Elm Street: 603-851-2197
Campus: 603-645-9700
Tucson: 520-402-4162
Kenzie: 317-644-4973

- **Health Screening:** In keeping with the Universal Best Practices, all employees should ask themselves the following questions each day before reporting to work and answer based on whether the symptoms are new and/or unexplained:

  1. Do you have any symptoms of COVID-19? Symptoms of COVID-19 can include:
     - Fever (defined as a temperature of 100.4 or higher) or feeling feverish;
     - Respiratory symptoms such as a runny nose, nasal congestion, sore throat, cough, or shortness of breath;
     - General body symptoms such as muscle aches, chills, and severe fatigue;
     - Gastrointestinal symptoms such as nausea, vomiting, or diarrhea; or
     - Changes in your sense of taste or smell?
  2. Have you had close contact with someone in the prior 10 days who has tested positive for COVID-19?
  3. If you are unvaccinated, have you traveled in the past 10 days internationally (outside of the U.S., except for essential travel to/from Canada) or on a cruise ship? (Essential travel to/from Canada includes for work, school, personal safety, medical care, care of others, or parental shared custody. Essential travel also includes travel for students and their parents or guardians who are visiting institutions of higher learning or preparatory high schools as potential future students, including allowing the students to remain at the schools for overnight stays.)

- Any employee answering “yes” to any health screening question (and the symptoms are new or unexplained), must not report on-site and instead should notify their supervisor and should report the result to their HRBP or HR4U@snhu.edu immediately and await further guidance before reporting on-site. In these situations, the employee will normally be referred to their healthcare provider and should follow the NH DHPS Guidelines for testing, Isolation or Self-Quarantine, as appropriate. If you are symptomatic, vaccinated or not, please do not report to the office without first consulting with HR.

Please note that the above screening questions may be updated from time to time in keeping with updates to the Universal Best Practices.

- **Surveillance Testing:**

Prior to September 30, 2021, Unvaccinated Employees who are regularly working on-site in any New Hampshire based location four (4) or more hours per week are required to participate in surveillance testing. For purposes of this policy, regular on-site work means on a weekly or similar, routine schedule (it does not include occasional meetings or short, sporadic visits). Synergy-designated employees who are in-place and dual-place are presumed to meet this criteria. It is also presumed that Any-Place employees do not work on-site regularly and therefore, would not meet this criteria. However, any employee who’s on-site work does meet this criteria and has not been contacted by HR, must notify HR by reaching out to their HRBP or HR4U immediately. This requirement to notify HR applies to employees of all statuses, Synergy-designated or otherwise. Unless otherwise directed by the
University, weekly surveillance testing for COVID-19 in accordance with the criteria outlined above, is required.

Due to the likelihood of continuing positive test results following initial diagnosis, employees returning to work who have had a prior COVID-19 infection may be eligible for a temporary exemption from the SNHU surveillance testing program. Employees are encouraged to consult with their medical provider about whether exemption is appropriate based on their personal circumstances. Employees seeking exemption may be asked to provide a note from their medical provider or proof of prior positive test in support of the request and can contact their HRBP for more information.

**Vaccinated employees** and all employees in locations outside of New Hampshire (i.e. Tucson, Indiana and the Vermont Center) are not required to participate in surveillance testing at this time.

The criteria for surveillance testing is based upon present circumstances, and takes into consideration CDC guidance for Institutions of Higher Education, as well as guidance from other government agencies and public health authorities, and other safety protocols currently in place at the university. The university reserves the right to modify these criteria, in its discretion.

**Reporting symptoms while working/leaving work:** Employees that develop new or unexplained symptoms of COVID-19 while at work, regardless of their vaccination status, must notify their supervisor and go home immediately. Managers receiving such reports should report this information to their HRBP or HR4U@snhu.edu and Public Safety immediately. If an employee refuses to go home after being instructed to do so or is otherwise not compliant with the required processes contained in this policy, may be subject to disciplinary action, up to and including termination. Employees who are sent home should refer to Return to work after reporting exposure risk or after illness (above).

**Remote work.** As determined appropriate by the university, employees who normally work on-site and are also capable of performing work from home or remotely, may be encouraged or told to continue to work from home during the pandemic. The arrangement may be temporary or long-term depending on pandemic-related/contagion-related conditions such as public shelter-in-place orders, quarantines, childcare service disruptions or school closings and other related factors, as determined by SNHU Leadership. SNHU will determine what equipment, if any, to provide to the employee to facilitate any remote or telework arrangement. Employees are expected to maintain remote workspaces in a safe condition, free from hazards to people and equipment.

**Return to on-site work.** The University will be directing employees to return to on-site work as outlined in the Operational Guide. Generally before coming onsite, employees should make sure they are familiar with the COVID-related onsite work requirements by reviewing the Operational Guide and completing the on-line training related to this policy and key safety measures. The training is available on Compass by clicking on the following link: The COVID-19 Management Policy Overview. As noted above, unless provided an exemption for disability of sincerely held religious belief, proof of Covid-19 vaccination is required as a condition to return to on-site work.

In the event an employee that is notified to return to on-site work is concerned about their individual risk because they are considered particularly vulnerable to COVID-19 according to the CDC, either due to age or underlying health conditions, they should contact their supervisor in advance of their scheduled return date to discuss their options. The Americans with Disability Act (ADA) may apply in these situations and employees are encouraged to refer to that policy in the Employee Handbook for additional information, as well as reach out to their HRBP. Additionally, employees who have other concerns, including related to the vaccination requirement, childcare, family circumstances, or other personal circumstances impacting their work are encouraged to discuss with their supervisor or their HRBP.

**Social distancing.** To the greatest extent possible, all employees are encouraged to maintain safe social distancing, where feasible, which means keeping a distance of at least 6 or more feet between one another at all times. Employees and others may be prohibited from congregating in meeting rooms, common areas and all other on-site locations. Employees on-site should be sure to review any on-site signs or postings.
SNHU employees who have been approved by HR to work on-site can meet in SNHU facilities as they are formally phased back to work. All meetings must be reserved in advance and everyone must follow room density guidelines posted at each conference room, and follow SNHU’s health and safety guidelines. Meetings should include phone or computer conferencing options for participants whenever possible.

Employees that have not yet been formally phased back to work with a critical business need to meet onsite must work with their manager to get approval from their executive leader. Any employees coming onsite for such meetings must email covid19@snhu.edu with names and meeting details (time, date, location), adhere to these social distancing guidelines and wear disposable masks or cloth face coverings.

**Use of PPE and cloth face coverings.** As a general rule, regardless of their vaccination status, employees working in SNHU buildings (at any SNHU location) are required to wear a disposable mask or cloth face covering to help protect against the spread of the virus. Face coverings should be worn properly, by covering both the nose and mouth. Face coverings should be worn at all times, including when traveling through buildings, when in building common areas (lobbies, hallways, conference rooms, reception areas, restrooms, kitchen areas, etc.) and when in outdoor spaces on SNHU property where social distancing is not possible. The following are exceptions to this requirement:

- Employees working in their own private, enclosed office;
- Employees working in partitioned cubicles, which are at least 54 inches or higher and which constitute their primary workspace (i.e. it is not a common, shared space, such as a reception area or conference room), only while seated and provided adequate social distancing can be maintained.

As we are acclimating back on-site, we want to encourage great care for each other in fostering an inclusive environment and creating a culture of facemask acceptance.

All employees are encouraged to review the CDC’s guidance on use of cloth face coverings. Every effort will be made to have disposable facemasks at worksites for emergency use; employees are strongly encouraged to bring their own masks or cloth face coverings.

Additional departmental or job specific requirements for use of PPE and other requirements may apply in some cases, beyond the minimum requirements, above. As always, employees are required to follow all safety and training procedures applicable to their department or job function.

Any employee who is required to wear a face covering under this policy but unable to do so because of to health or other reason is encouraged to speak to their HRBP to discuss an alternative plan. ADA may apply in these situations and employees are encouraged to review that policy in the Handbook.

**Protocols upon notice of a positive case.** In the event a SNHU employee is diagnosed with or has been exposed to COVID-19 and the employee has been on-site at a SNHU location in the prior 10 days, the employee must notify HR4U@snhu.edu or their HRBP. This information is necessary to respond effectively to protect the health and safety of other on-site employees and will be treated as confidential health information as required under applicable law. In situations where SNHU is notified of an employee being diagnosed with COVID-19, cleaning and disinfection protocols will be implemented in accordance with CDC recommendations.

If an employee is diagnosed with COVID-19, SNHU will engage in contact tracing efforts and inform other employees of their possible exposure in the workplace, but the confidentiality of the infected employee will be maintained as required by applicable law. Any employee identified through contact tracing efforts as having possible exposure to COVID-19 may be sent home and will be asked to follow exposure risk protocols, as appropriate, including not reporting to work, contacting their healthcare provider about testing and Isolating or Self-Quarantining as provided in the NH DPHS Isolation and Quarantine Guidelines. As noted above, SNHU will follow the **NH COVID-19 Employer Travel, Screening and Exclusion Guidance** in determining appropriate criteria for an employee’s return to work in such cases.

**Travel Restrictions.**

- **Work related travel.** As of September 30, 2021, only Vaccinated Employees may participate in limited domestic business travel for essential business need; all travel requires manager
Essential travel is travel that is necessary to complete one’s job and there is not a reasonable alternative to accomplish that task. Voluntary travel to attend professional or educational conferences is not considered essential. If there are additional questions on “essential business needs,” please reach out to the SNHU COVID-19 Taskforce at COVID19@snhu.edu. Employees must follow all state, local, and federal travel and health guidelines, including quarantine, testing procedures, etc. and should view the CDC travel guidelines for more information. Employees are also encouraged to use good judgment and refrain from returning onsite after travel (for a quarantine period) whenever possible.

SNHU will continue to evaluate the risk of employee exposure to COVID-19 from business travel, and may make adjustments to this policy as it deems appropriate, taking into consideration any travel bans or advisories issued by government agencies, including the US Department of State and the CDC.

- **Personal travel.** Employees traveling for personal reasons, whether within or outside the United States, are expected to review guidance related to the travel destination from the CDC and local health agencies such as the New Hampshire Department of Health and Human Services and the Arizona Department of Health Services and are required to follow any applicable federal or state testing, isolation or quarantine requirements or recommendations. Employees who may be required to isolate or quarantine in connection with personal travel should discuss their travel plans with their manager in advance and generally should use Paid Time Off (“PTO”) if they need to quarantine and cannot work remotely.

**Nonessential activities.** During the pandemic SNHU may continue to postpone or cancel nonessential activities, including meetings, gatherings and training sessions, as it deems appropriate. Affected employees will be notified as soon as practicable.

**Relocation of essential activities.** SNHU will notify all affected employees in the event essential on-site activities must be relocated and will provide instructions to continue or resume essential functions.

**Attendance and Leave.** SNHU attendance and leave policies will remain in place during the pandemic, unless otherwise notified. If an employee has a particular challenge (e.g., childcare issues in the event of a school closure), they should speak to their supervisor to determine an alternative plan. The University has asked managers to provide increased flexibility to staff during the pandemic when possible, to try to structure workdays in ways that can be beneficial to the employee and meet the University’s business needs.

If an employee is unable to work (or telework) because of exposure to COVID-19, or for other pandemic related reasons, the employee may be required to submit additional documentation related to the absence.

Employees will be notified of any work schedule changes caused by the pandemic. Requests to adjust individual work schedules will be addressed on a case-by-case basis.

**On-site Work May Be Prohibited.** SNHU reserves the right to prohibit an employee or another individual who is not in compliance with this policy, who is exhibiting symptoms of COVID-19 or who has tested positive test for COVID-19 from entering on-site facilities, programs and functions if a determination is made that the entry introduces a recognized hazard to the workplace and the restriction protects the safety and health of employees, customers and others. Every effort will be made to accommodate such employees prohibited from on-site work with remote work, or other alternative work.

**Exposure risk assessment and policy adjustments.** Exposure risk assessment is ongoing. Additional or different measures to minimize the spread of the infection at each work location may be instituted based on the risk level of exposure to employees. SNHU may install protective devices or adopt other interventions to prevent or mitigate exposure to an infectious disease when and where feasible. In addition to other measures described in this policy, SNHU may institute controls such as:

- Installing physical barriers to control spread of the disease (e.g., plastic sneeze guards); or
- Staggering work schedules to minimize the number of individuals at the workplace or allow for thorough cleaning and disinfection between work shifts.
- Other measures as deemed appropriate by Leadership.
Questions or concerns relating to this policy. As noted above, this COVID-19 Management Policy is subject to change. Employees with questions about this COVID-19 Management Policy, or wishing to report concerns or violations of this policy, should contact HR4U@snhu.edu, their HRBP, or Anonymous Report of SNHU COVID Policy Violations. Retaliation for bringing forward good faith concerns or complaints related to the policy and/or the University's COVID-19 compliance is strictly prohibited and can be reported to the sources listed above.