

Communicable Diseases Policy

March 2020

Scope of Policy: This Policy sets forth the principles Washington University in St. Louis (hereafter referred to as WU) will follow to protect its patients, faculty, staff, and appointed students and trainees, whenever possible, from exposure to certain communicable illnesses. The scope of this policy addresses actions that WU may take to ensure appropriate clinical decision-making and that screening, assignments, pay and benefits for faculty, staff, and trainees (Covered Individuals) are appropriately applied to certain situations where illness or suspected illness may arise. Clinical guidance relevant to specific communicable illnesses, including active tuberculosis, influenza, conjunctivitis, human immunodeficiency virus (HIV), viral Hepatitis and Coronavirus 19 (COVID-19), among others, will be developed by physician leaders of the Faculty Practice Plan, WU Infectious Diseases physicians, the Medical Director of Infection Prevention and the Director of Occupational Health, and medical leadership at the Habif Health and Wellness Center.

General Principles: It is the policy of WU to review, evaluate, and respond to any suspected or confirmed instances of certain communicable illnesses among members of the WU community which may be transmitted in normal business, academic or patient care settings. Such individual review, evaluation, and response will take into consideration applicable federal and state laws; recommendations of the U.S. Public Health Service, the Centers for Disease Control and Prevention, the Association of American Medical Colleges, the American College Health Association, and various other professional associations and relevant medical, scientific, and legal literature. The expressed desires and opinions of the individual with such illness and the individual's personal physician will also be taken into consideration. WU is committed to the protection of both public health and individual rights to the extent possible in each case.

Covered Individuals with suspected or confirmed chronic blood-borne pathogen infections that are not highly contagious may be able to work safely, as long as they: (1) meet acceptable performance standards; (2) comply otherwise with all required Occupational Health policies, including mandatory screenings and vaccinations; and (3) based on the medical evidence their conditions are not a threat to others in the workplace. It is the policy of WU that Covered Individuals with chronic blood-borne pathogen infections shall not be treated differently solely on the basis of their health status. For Covered Individuals, any restrictions on work assignments will be evaluated on a case-by-case basis and will be based on the type of illness, the individual's health status, and the nature of work or work/academic setting, and other relevant factors.

Covered Individuals with certain acute communicable illnesses transmitted by airborne, droplet or direct contact are not permitted to work/academic setting until they are no longer contagious and will be managed in accordance with Infection Prevention and

Occupational Health policies to minimize the risk of disease transmission in the workplace. In the setting of an epidemic or pandemic, case-by-case evaluation may not be possible and broad restrictions may be implemented.

Responsibilities of WU and Covered Individuals

WU will address issues involving communicable illnesses in a sensitive and responsible manner, with concern for the rights and welfare of patients, faculty, staff, appointed students and trainees.

1. **Obligation to Treat Patients and Perform Assigned Work.** Clinical services of WU rest in the hands of the patient care providers who are expected to provide the best possible care to all of our patients. Covered Individuals with patient care responsibilities may not refuse to treat a patient whose condition is within their realm of competence solely because the patient has a suspected or confirmed communicable illness. Covered Individuals with certain conditions placing them at higher risk of infection and/or complications, including but not limited to compromised immune systems or pregnancy, may be reassigned to duties with lower risk of exposure to the communicable illness if indicated, based on medical guidance. Requests for reassignment will be evaluated by Occupational Health (or Student Health), in collaboration with Human Resources, Infectious Diseases leadership and the individual's physician. Managers will be informed of reassignment decisions, while maintaining confidentiality of the medical condition to the extent possible.

This obligation to perform one's work duties extends to all Covered Individuals at WU, regardless of role or function. Covered Individuals are required to report to work, unless they are otherwise not scheduled, have been given prior permission to work from home, or are on approved time off.

2. **Communicable Illness Screenings.** Any Covered Individual who believes he or she has contracted a communicable illness that may be transmitted in a business, academic or patient care setting must contact Occupational Health to report the symptoms or illness. (Covered Individuals who work outside of normal business hours should report symptoms of communicable diseases to their supervisor and either be sent home or, if they are acutely ill and need immediate attention, be directed to the Emergency Room at Barnes-Jewish Hospital or to their private physician for evaluation.) During certain communicable disease outbreaks such as a large epidemic or pandemic, all Covered Individuals may be required to undergo mandatory health screenings and/or health status reporting on a regular basis. Such provisions will be activated upon direction from the Executive Vice Chancellor for Medical Affairs and/or the Chancellor or their designee(s) and will be implemented by Occupational Health and the Infectious Diseases leadership based on medical guidance including recommendations from federal, state and local public health authorities. Under such emergency provisions, WU may require Covered Individuals who travel to and from regions with active communicable

illness outbreaks to report all such travel to Occupational Health and to undergo testing and screenings considered medically appropriate prior to returning to work or the academic setting. Appropriate medical clearance from WU and/or the employee's/trainee's personal physician may be required. This also applies to new members of the WU community coming from such regions who would need to be screened prior to beginning their WU appointment. WU business travel may be suspended and position appointments delayed during outbreaks or pandemics or when WU is responding to local, regional or national emergency conditions.

3. **Medical Care.** Covered Individuals with suspected or confirmed communicable illnesses are encouraged to seek proper medical care, counseling, and education. Individuals should notify medical providers in advance of arrival at a hospital or doctor's office of their symptoms, travel history and potential exposures so that appropriate infection prevention and isolation precautions can be used. Covered Individuals should look primarily to their personal physician for appropriate medical care and counseling. Any Covered Individual with a suspected or confirmed communicable illness who is experiencing difficulty in obtaining expert medical care and counseling is encouraged to seek assistance from Occupational Health (or Student Health), with consultation by the Infectious Diseases leadership, as needed. At any time, WU may require an individual to be assessed by a WU-appointed physician to determine fitness for duty.
4. **Confidentiality.** WU recognizes the importance of protecting, the confidentiality and privacy interests of all persons suspected of having, or who have, a communicable illness. WU will disclose sensitive medical information of Covered Individuals no further than is necessary to ensure the health and safety of all members of the WU Community, and in a manner consistent with applicable law.
5. **Reporting and Review Requirements for Certain Communicable Illnesses.** All Covered Individuals who know they have a communicable illness or who have a reasonable basis for believing that they have been exposed to a communicable illness have an obligation to conduct themselves responsibly for their own protection and the protection of patients and others. Covered Individuals with communicable illnesses must not knowingly engage in any activity that creates a material risk of transmission to others. Decisions affecting the entire WU Community regarding restrictions on or modifications of employment and academic duties/activities and access to facilities or programs as a result of a communicable illness will be made in accordance with existing Occupational Health and Infection Prevention policies. Where applicable, review may be performed on a case-by-case basis, when indicated, depending on the type and nature of the communicable illness, the nature of work or work/academic setting, and the risk to the health of the individual or others. Such restrictions or modifications may include, among other things, changes in job functions, location, or work schedule, and/or removing the individual from the work/academic setting. WU shall make efforts to implement such decisions as discreetly and confidentially as possible, with as little harm as possible to the person, his/her career, and his/her standing in

the community. Occupational Health (or Student Health), in conjunction with the Infectious Diseases leadership, will establish clinical guidelines which govern reporting, screening, treatment, safety protocols and return-to-work standards for specific communicable illnesses. This policy will be administered in conjunction with these policies. For the health and safety of all, members of the WU community are expected to comply with these provisions.

6. **Work from Home.** Note that Covered Individuals may be directed at any time to remain home based on business and safety needs. Where feasible and the nature of the work allows it, management may permit work to be performed from home under the provisions of the University's telecommuting policy. Regular pay will apply for hours worked.

Periods of Illness or Quarantine. Certain communicable illnesses may require a period of time away from the workplace in order to protect the health of others. In order to encourage Covered Individuals to stay home to care for themselves or for family members who are ill, time off will be granted and employee/trainees will not be penalized for requesting time away.

Quarantine: Where quarantine is medically imposed due to a Covered Individual's exposure, the individual will be paid regular pay and will not have sick or vacation balances reduced during the period of quarantine. This applies whether quarantine is required due to work related or non-work related exposure, whether incidental or due to providing care to a family member. Continuance of paid compensation during quarantine will last until the medically required period of quarantine ends. A Covered Individual is expected to remain home during periods of quarantine and may work from home with appropriate pay during this period if permitted by departmental arrangement.

Illness: If a Covered Individual becomes actively ill with a communicable disease due to a work-related exposure, the employee will be paid according to the workers' compensation policy and/or other applicable leave or time off policies. Pay for periods of non-work related personal illness will be provided through the use of short-term medical disability and/or other applicable leave or time off policies (<https://hr.wustl.edu/policies/>). In cases where Covered Individuals are serving an orientation period or otherwise do not have paid time off available, such time may be advanced upon approval of Human Resources.

Applicable time-off and/or leave policies will be applied for Postdoctoral and Clinical Fellow appointees.

Other Required Absence from Work: Under certain conditions affecting the entire WU community such as a large epidemic or pandemic, the Executive Vice Chancellor for Medical Affairs and/or the Chancellor may enact emergency time-off provisions to cover periods of personal illness among employees. In circumstances where such epidemic or pandemic communicable illnesses are determined to have

been contracted due to the performance of work at the employer's direction, employees/trainees may be granted paid days away from the office due to illness without affecting their sick or vacation balances. The number of days granted will be determined with input from Human Resources and WU Infectious Diseases leadership specific to the pathogen (e.g., duration of infectivity). Once these additional days of paid time off are exhausted, standard time off and leave policies apply.

FMLA may apply during the period of illness and/or quarantine depending on the nature and timing of the exposure. Applicability will be determined by FMLA regulations.

In the case of a vaccine-preventable communicable disease outbreak, employees who are not vaccinated and who risk possible exposure to the vaccine-preventable communicable disease in the course of their duties in the workplace will be sent home until the risk of possible workplace exposure is mitigated. Unless the employee has received an exemption from the vaccination requirement from the appropriate University office the employee will be required to use their vacation time. If the employee becomes ill with the vaccine-preventable communicable disease, the applicable provisions above will apply.

7. **Additional Resources.** The following university services/offices and federal agencies are available to provide information and respond to questions about communicable illnesses.

- Unum (1-866-371-5723)
 - FMLA for staff and postdoctoral associates
 - Short Term Medical Disability for staff
- MyTimeOff@wustl.edu FMLA for faculty
- WUSM Occupational Health, Campus Box 8030 (314-362-3528)
- Environmental Health and Safety Office, Campus Box 8229 (314-362-6816)
- WUSM Student Health Services, Campus Box 8030 (314-362-3523)
- Division of Infectious Diseases, Campus Box 8051 (314-454-8354)
- Habif Health and Wellness Center, Campus Box 1201 (314-935-6666)
- Centers for Disease Control and Prevention (<https://www.cdc.gov/>)