

POLICY

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Safety Plan For Healthcare Settings In
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1648.14 SAFETY PLAN FOR HEALTHCARE SETTINGS IN SCHOOL BUILDINGS – COVID-19

A. Purpose and Scope

The Board of Education is committed to providing a safe and healthy workplace for all employees and has adopted this Policy that shall be the school district's COVID-19 Plan (Plan) that includes procedures to minimize the risk of transmission of COVID-19, in accordance with Occupational Safety and Health Act of 1970 (OSHA) COVID-19 Emergency Temporary Standard (ETS) published on June 21, 2021. The ETS, 29 CFR 1910 - Subpart U, applies to all settings where any school district employee or contracted service provider provides healthcare services or health care support services. Public Employees' Occupational Safety and Health (PEOSH), the agency with jurisdiction over public employers in New Jersey, has adopted the ETS in full. However, its applicability for school districts is primarily restricted to the nurse's office and any adjoining clinical areas and not the entire school building.

The Board, administration, and the COVID-19 Safety Coordinator(s) will work collaboratively with all employees in the development, implementation, monitoring, and updating of this Plan.

1. Definitions

- a. "Employee" means any district employee or contracted service provider working in a healthcare setting where people with suspected or confirmed COVID-19 are reasonably expected to be present.
 - (1) Therefore, the provisions of the ETS and this Policy only apply to employees or contracted service providers working in a nurse's office or any adjoining clinical areas.
- b. "Healthcare setting" means all settings in the school district where any employee or contracted service provider provides healthcare services or healthcare support services.
 - (1) Where a healthcare setting is embedded within a non-healthcare setting (i.e. school nurse's office and any adjoining clinical areas in a school building), the ETS and this Policy only apply to the embedded healthcare setting and not to the remainder of a school building in accordance with 29 CFR 1910.502(a)(3)(i).



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c. For the purpose of this Policy, additional definitions shall be those definitions listed in 29 CFR 1910.502(b).

2. The school district has multiple healthcare settings that are substantially similar; therefore; has developed and adopted this single Plan for these substantially similar healthcare settings, with site-specific considerations included in this Plan. The healthcare settings in the school district are listed in Appendix 1.

a. Any school district health care settings that are not substantially similar, the school district shall develop and adopt separate COVID-19 Plans for each healthcare setting and list them in Appendix 1.

B. Roles and Responsibilities for School District Employees

1. The school district's goal in adopting this Policy is to prevent the transmission of COVID-19 in the school district's healthcare settings. All staff members are responsible for supporting, complying with, and providing recommendations to further improve this Plan.

2. The Superintendent will designate a COVID-19 Safety Coordinator(s) who shall implement and monitor this Plan. The COVID-19 Safety Coordinator(s) shall have the school district's full support in implementing and monitoring this Plan, and has authority to ensure compliance with all aspects of this Plan.

C. Hazard Assessment and Worker Protections

1. The Superintendent of Schools or designee will conduct a specific hazard assessment of its healthcare settings to determine potential hazards related to COVID-19.

a. A hazard assessment will be conducted initially and whenever changes in a healthcare setting in the school district create a new potential risk of employee exposure to COVID-19 (e.g., new work activities in the healthcare setting).

2. The Superintendent has developed and the Board has adopted this Plan that includes the procedures the school district will use to determine an employee's vaccination status as outlined in Appendix 2.



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- a. In the event the Superintendent or designee cannot or does not determine or confirm the vaccination status of an employee, the employee shall be presumed to be unvaccinated.
3. All completed hazard assessment forms and results will be attached to this Plan in Appendix 3 and will be accessible to all employees at each school district facility.
4. The school district will address the hazards identified by the assessment, and have included in this Plan the procedures to minimize the risk of transmission of COVID-19 for each employee. These procedures are included in the following Appendices:
 - a. Patient Screening and Management
 - (1) In healthcare settings in the school district where direct patient care is provided, the school district will include protocols addressing patient screening and management in Appendix 4.
 - b. Standard and Transmission-Based Precautions
 - (1) The school district will develop and implement procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC’s “Guidelines for Isolation Precautions” which are included in Appendix 5.
5. Personal Protective Equipment (PPE)
 - a. The school district will provide and ensure that employees wear approved facemasks or a higher level of respiratory protection.
 - b. The school district will include protocols to address PPE for healthcare settings in Appendix 6.
6. Physical Distancing
 - a. The school district will ensure that each employee is separated from all other people in the healthcare setting by at least six feet when indoors, unless it can be demonstrated that such physical distance is not feasible for a specific activity.



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- (1) Where maintaining six feet of physical distance is not feasible, the school district will ensure employees are as far apart from other people as possible.
 - b. Physical distancing will be implemented, along with the other provisions required by the ETS, as part of a multi-layered infection control approach for all healthcare settings.
 - c. The school district will include protocols to address physical distancing for healthcare settings in Appendix 7.
7. Physical Barriers
 - a. The school district will install physical barriers at each fixed work location outside of direct patient care areas where each employee is not separated from all other people by at least six feet of distance and spacing cannot be increased, unless it can be demonstrated that it is not feasible to install such physical barriers.
 - b. Physical barriers will be implemented, along with the other provisions required by the ETS, as part of a multi-layered infection control approach for all healthcare settings.
 - c. The school district will include protocols to address physical barriers for healthcare settings in Appendix 8.
8. Cleaning and Disinfecting in the Healthcare Setting
 - a. The school district will implement policies and procedures for cleaning, disinfecting, and hand hygiene, along with the other provisions required by the ETS, as part of a multi-layered infection control approach for all healthcare settings.
 - b. The school district will include protocols to address cleaning and disinfecting for healthcare settings in Appendix 9.



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9. Ventilation

- a. The school district will implement procedures for each facility's heating, ventilation, and air conditioning (HVAC) system and include protocols addressing ventilation for healthcare settings in Appendix 10.
- b. Ventilation policies and procedures will be implemented, along with the other provisions required by the ETS, as part of a multi-layered infection control approach.
- c. The Superintendent or designee will identify the building manager, HVAC professional, or maintenance employee who can certify that the HVAC system(s) are operating in accordance with the ventilation provisions of the ETS and list the individual(s) in Appendix 10.

D. Health Screening and Medical Management

1. Health Screening

- a. "Screening" means, for the purpose of this Policy, asking questions to determine whether a person is COVID-19 positive or has symptoms of COVID-19.
- b. The school district will include protocols to address health screening for employees in Appendix 11.

2. Employee Notification to Employer of COVID-19 Illness or Symptoms

- a. The school district will include protocols to address employee notification to employer of COVID-19 illness or symptoms for employees in Appendix 11.

3. Employer Notification to Employees of COVID-19 Exposure in the Healthcare Setting

- a. The school district will include protocols to address employer notification of COVID-19 exposure to employees in Appendix 11.

4. Medical Removal from the Healthcare Setting



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a. The school district will include protocols to address medical removal from the healthcare setting for employees in Appendix 11.

5. Return to Work Criteria

a. The school district will include protocols to address return to work criteria for employees in Appendix 11.

6. Medical Removal Protection Benefits

a. The school district will continue to pay employees who have been removed from the healthcare setting under the medical removal provisions of the ETS. When an employee has been removed from the healthcare setting and is not working remotely or in isolation, the school district shall pay and provide benefits in accordance with the Plan addressed in Appendix 12.

E. Vaccinations

1. The school district encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. The school district will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.

2. The school district will include protocols to address vaccination for employees in Appendix 13.

F. Training

1. The school district will implement policies and procedures for employee training, along with the other provisions required by the ETS, as part of a multi-layered infection control approach.

2. The school district will include protocols to address training for employees in Appendix 14.



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G. Anti-Retaliation

1. The school district will inform each employee that employees have a right to the protections required by the ETS, and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by the ETS, or for engaging in actions that are required by the ETS.
2. The school district will not discharge or in any manner discriminate against any employee for exercising their right to the protections required by the ETS, or for engaging in actions that are required by the ETS.

H. Requirements Implemented at No Cost to Employees

1. The school district will comply with the provisions of ETS at no cost to its employees, with the exception of any employee self-monitoring conducted under D. above.

I. Recordkeeping

1. The school district will retain all versions of this Policy to comply with the ETS while the ETS remains in effect.
2. The school district will establish and maintain a COVID-19 log to record each instance in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work.
 - a. The COVID-19 log will contain, for each instance, the employee's name, one form of contact information, occupation, location where the employee worked, the date of the employee's last day in the healthcare setting, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.
3. The school district will record the information on the COVID-19 log within twenty-four hours of learning that the employee is COVID-19 positive.



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- a. The school district will maintain the COVID-19 log as a confidential medical record and will not disclose it except as required by the ETS or other Federal law.
 - b. The school district will maintain and preserve the COVID-19 log while the ETS remains in effect.
4. By the end of the next business day after a request, the school district will provide, for examination and copying:
- a. All versions of this Policy which is the written Plan for all employees;
 - b. The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee; and
 - c. A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was in the healthcare setting before removal, the date of that employee's positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all employees.

J. Reporting

1. The school district will report to PEOSH:
 - a. Each work-related COVID-19 fatality within eight hours of the school district learning about the fatality;
 - b. Each work-related COVID-19 in-patient hospitalization within twenty-four hours of the school district learning about the in-patient hospitalization.



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K. Monitoring Effectiveness

1. The school district and the COVID-19 Safety Coordinator(s) will work collaboratively with employees to monitor the effectiveness of this Plan so as to ensure ongoing progress and efficacy.
2. The school district will update this Policy as needed to address changes in specific COVID-19 hazards and exposures in the healthcare setting.

This Policy and its Appendices will be made available upon request.

29 CFR 1910.502

Occupational Safety and Health Administration Fact Sheet Subpart U COVID-19

Healthcare Emergency Temporary Standard

Occupational Safety and Health Administration Model Plan

[See POLICY ALERT No. 225]

Adopted:



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Appendix 1 – Healthcare Settings in the School District.

School-based Healthcare Settings shall be the School Nurse’s Office and, where applicable, the Full Service Community School Clinic (“FSCS Clinic”). These settings are substantially similar to each other and no site-specific considerations are warranted.

FACILITY	HEALTHCARE SETTING
75 Spruce St. (Elementary)	School nurse’s office.
8 Morris St. (Elementary)	School nurse’s office.
District Office	School nurse’s office.



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Appendix 2 – Vaccination Status Plan.

To determine the vaccination status of students and staff, the District will administer periodic surveys in addition to collecting vaccination records as required by Executive Order 253. If the District cannot determine the vaccination status of an individual student or staff member, that individual will be considered not fully vaccinated and will be required to submit to weekly screening tests for COVID-19.



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Appendix 3 – Completed Hazard Assessment Forms.

Please see the attached Hazard Assessment Forms for each Healthcare Setting in the District.



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Appendix 4 – Patient Screening and Management.

All students and staff will be required to complete a certification form at the beginning of the school year, acknowledging that they will self-monitor for COVID-19 symptoms daily and will not enter any District facility while experiencing symptoms. Students and staff will receive daily email reminders listing COVID-19 symptoms. All others must complete a health screening questionnaire daily upon arrival to any District facility. Additionally, all students, staff, and visitors will have their temperature checked daily before entering any District facility and will be required to wear a mask at all times.



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Appendix 5 – Standard and Transmission-Based Precautions.

See Regulation 8451.01 (Reopening After Pandemic-Related Closure) for a list of standard and transmission-based precautions.



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Appendix 6 – Personal Protective Equipment (PPE)

Employees will receive appropriate PPE, including facemasks, from their Principal or lead building administrator. Healthcare staff will receive N95 or KN95 facemasks.

Students, teachers, staff members, and visitors will have access to disposable face coverings daily. Students, teachers, and staff members will be provided reusable masks every three months. Principals will disseminate the proper personal protective equipment (PPE) equipment and supplies.

The most effective fabrics for cloth masks are tightly woven such as cotton and cotton blends, breathable, and in two or three fabric layers. Masks with exhalation valves or vents, masks made with loosely woven fabrics, and masks that do not fit properly are not recommended.

Reusable masks should be washed every day of use or if it is soiled.

Disposable masks should be changed daily or when visibly soiled, damp, or damaged.

Students, teachers, and staff will have access to additional disposable or cloth masks in case a backup mask is needed (e.g., a mask is soiled or lost during the day).

Clear masks that cover the nose and wrap securely around the face may be used in certain circumstances including for the teaching of students with disabilities, young students learning to read, or English language learners.

There are no job tasks in which the use of a facemask presents a hazard of serious injury or death.



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Appendix 7 – Physical Distancing

Graphic signs and floor markings are installed in all buildings to direct the direction and path of travel, and to ensure physical distancing.

Workstations will be situated at least 6 feet apart where possible, or equipped with Plexiglas desk partitions to ensure physical distancing. For healthcare settings, students and staff will be required to line up and wait outside the nurse's office until they are called; the number of people who may enter the room at one time will be limited and

Signs will remain throughout the building regarding social distancing and keeping to the right when walking in the hallways. Staff and students will wear masks while traveling through school buildings.

Frequent hand washing and respiratory protocols will continue to be encouraged

Medical accommodations will be granted to healthcare staff as necessary, without undue burden on the employer.



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Appendix 8 – Physical Barriers

Desks and seats will be arranged to help maintain physical distancing of three feet.

Workstations will be situated at least 6 feet apart where possible, or equipped with Plexiglas desk partitions to ensure physical distancing.

Trifold partitions will be used as physical barriers on students' and teachers' desks. Additionally, staff will use strategies to minimize mixing between groups whenever possible. Classrooms will continue to have several layers of protection against the spread of the COVID-19 virus, and be equipped with hand sanitizer, an EPA-approved disinfectant spray and ionizing air purification devices.

Signs will remain throughout the building regarding social distancing and keeping to the right when walking in the hallways. Staff and students will wear masks while traveling through school buildings.



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Appendix 9 – Cleaning and Disinfecting

The use and sharing of high-touch materials, supplies, and equipment will be minimized. Such materials will be used by one group of students at a time, and cleaned and disinfected routinely, preferably between uses.

Staff and students will be encouraged to wash or sanitize their hands after using shared items. All offices and classrooms will have sanitizing stations.

Shared items that cannot be cleaned or disinfected will not be used.

The District will provide regular in-service training of Facilities Department staff that will include topics on infection control (use of PPE), District regulations to reduce the spread of COVID-19, symptoms of COVID-19, general hygiene, social distancing, safe work practices, and the use of products to disinfect and sanitize school buildings.

High-traffic areas and frequently touched surfaces will be cleaned and disinfected regularly, using only EPA-approved disinfectants.

A procedure has been established and implemented for disinfecting contaminated areas in the event of on-site COVID-19 exposure.

Vollara Air and Surface Pro air purifiers have been placed in every occupied space. The units are equipped with ActivePure ionic technology that provides continuous surface decontamination and air purification in real-time, using superoxide molecules and hydro-peroxides that destroy contaminants on surfaces and in the air. The ActivePure Technology has been proven to eliminate over 99.9 percent of many common airborne and surface contaminants including viruses like the SAR-CoV-2 coronavirus, swine flu and bacteria, mold, fungi, volatile organic compounds (VOC), smoke, allergens, and odors.



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Appendix 10 - Ventilation

The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA's COVID-19 ETS: Neil Mapp, Chief Officer of Facilities and Custodial Services, Facilities Department.

The Facilities Department will continue servicing HVAC (heating, ventilation, and air-conditioning) systems based on manufacturers' specifications for preventive and routine maintenance. Air filters will be monitored and replaced if required, even ahead of the normal replacement interval.

Wherever possible, fresh air circulation will be increased in all occupied spaces by opening windows. The CDC recommends that even a slightly opened window can introduce beneficial outdoor air in rooms. A districtwide standard has been established to have a window remain open when classrooms and offices are occupied and where it does not create an imminent health/safety hazard



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Appendix 11 – Health Screening & Medical Management for Employees

All students and staff will be required to complete a certification form at the beginning of the school year, acknowledging that they will self-monitor for COVID-19 symptoms daily and will not enter any District facility while experiencing symptoms. Students and staff will receive daily email reminders listing COVID-19 symptoms. All others must complete a health screening questionnaire daily upon arrival to any District facility. Additionally, on-site COVID testing will be available weekly to all employees; unvaccinated employees must get tested weekly, while vaccinated employees may get tested voluntarily.

Employees are not permitted to report to work with COVID-19 symptoms. If symptoms emerge at work, the employee will be sent home immediately to placed in a designated isolation room to await transportation. Employees who feel sick before reporting to work must notify their supervisor as soon as possible, either by phone or email.

Employees who may use accrued leave, including sick days and Family Medical Leave when they need to stay at home due to illness, when household members are sick, or when required by a healthcare provider to isolate or quarantine themselves or a member of their household.

Employees who may have been exposed to COVID-19 will be notified by phone and email.

Sick or exposed employees may return to work/school according to the-current isolation/quarantine timeframes if their symptoms resolve (fever-free for 24 hours and other symptoms improve) and they present a negative test or medical clearance.

The school district will only allow employees who have been removed from the healthcare setting to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC’s “Isolation Guidance” and “Return to Work Healthcare Guidance.”]



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Appendix 12 – Vaccinations

The school district encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. The school district will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.

In addition, the District will encourage employees to get vaccinated at local community vaccination sites.



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Appendix 13 – Training

Training for healthcare staff is provided upon hire and annually at the beginning of each school year. In addition, further training is provided periodically whenever health and safety standards and requirements are materially revised. Training will be provided via teleconference, to ensure social distancing.

1. Employees will receive training, in a language and at a literacy level the employee understands, on the following topics:

a. COVID-19, including:

- (1) How COVID-19 is transmitted (including pre-symptomatic and asymptomatic transmission);
- (2) The importance of hand hygiene to reduce the risk of spreading COVID-19 infections;
- (3) Ways to reduce the risk of spreading COVID-19 through proper covering of the nose and mouth;
- (4) The signs and symptoms of COVID-19;



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- (5) Risk factors for severe illness; and

- (6) When to seek medical attention.

- b. The school district's procedures on patient screening and management;

- c. Tasks and situations in the healthcare setting that could result in COVID-19 infection;

- d. Healthcare setting-specific procedures to prevent the spread of COVID-19 that are applicable to the employee's duties (e.g., policies on Standard and Transmission-Based Precautions, physical distancing, physical barriers, ventilation, aerosol-generating procedures);

- e. Employer-specific multi-employer healthcare setting agreements related to infection control policies and procedures, the use of common areas, and the use of shared equipment that affect employees at the healthcare setting;

- f. The school district's procedures for PPE worn to comply with the ETS, including:
 - (1) When PPE is required for protection against COVID;



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- (2) Limitations of PPE for protection against COVID;
 - (3) How to properly put on, wear, and take off PPE;
 - (4) How to properly care for, store, clean, maintain, and dispose of PPE; and
 - (5) Any modifications to donning, doffing, cleaning, storage, maintenance, and disposal procedures needed to address COVID-19 when PPE is worn to address healthcare setting hazards other than COVID-19.
- g. Healthcare setting-specific procedures for cleaning and disinfection;
 - h. The school district's procedures on health screening and medical management;
 - i. Available sick leave policies, any COVID-19-related benefits to which the employee may be entitled under applicable Federal, State, or local laws, and other supportive policies and practices (e.g., telework, flexible hours, etc.);
 - j. The identity of school district's Safety Coordinator(s) specified in this Plan; and
 - k. The ETS - how the employee can obtain copies of the ETS and any employer-specific policies and procedures developed under the ETS, including this Policy, which is the school district's written Plan.



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2. The school district will ensure that the training is overseen or conducted by a person knowledgeable in the covered subject matter as it relates to the employee's job duties, and that the training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter as it relates to the employee's job duties.

3. The school district will provide additional training whenever changes occur that affect the employee's risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.]

