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Safety Plan For Healthcare Settings In  
School Buildings – COVID-19

Oct 21

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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).
  - 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.
  - 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.
    - (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.
  - 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
    - 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.

### 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.
    - 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;





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- b. Each work-related COVID-19 in-patient hospitalization within twenty-four hours of the school district learning about the in-patient hospitalization.

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

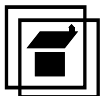
Adopted: 20 October 2021



### Appendix 1 – Identifying the Healthcare Settings in the School District:

Location of healthcare setting in the school district buildings listed below:

<b>Facility Location</b>	<b>Worksite-Specific COVID-19 Considerations</b>
<b>High School Nurse's Office</b>	<ul style="list-style-type: none"><li>• <b>Isolation Area</b></li><li>• <b>Physical Barriers</b></li></ul>
<b>Middle School Nurse's Office</b>	<ul style="list-style-type: none"><li>• <b>Isolation Area</b></li><li>• <b>Physical Barriers</b></li></ul>



**Appendix 2 – Vaccination Status Plan:**

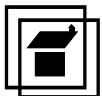
**The School Nurses collect all vaccination cards from all vaccinated employees and unvaccinated employees are subject to COVID-19 testing at a minimum of 1-2 times per week as per Executive Order 253.**



### Appendix 3 – Completed Hazard Forms and Results:

Please see the attached Hazard Assessment Forms and Results below:

Do you have a COVID-19 plan that was developed in consultation with non-managerial employees?	<b>Yes</b>
If you are claiming exemption under 1910.502(a)(4) from providing controls for fully vaccinated employees in a well-defined area(s) of the workplace where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present, do you have policies and procedures in place to determine employees' vaccination status?	<b>Yes</b>
Have you shared your COVID-19 plan with all other employers at your worksite(s) and coordinated to ensure all workers are protected?	<b>Yes</b>
Do you have policies to limit and monitor points of entry in settings where direct patient care is provided?	<b>Yes</b>
Do you have a policy to screen and triage all clients, patients, residents, delivery people, visitors, and other non-employees entering settings where direct patient care is provided for people who may have symptoms of COVID-19?	<b>Yes</b>
Do you have a health screening protocol for screening employees?	<b>Yes</b>
Do you have a log for recording all employee instances of COVID-19?	<b>Yes</b>
Do you have a policy that requires employees to notify you when they are COVID-19 positive or have been told by a licensed healthcare provider that they are suspected of having COVID-19?	<b>Yes</b>
Does the policy require employees to notify you if they are experiencing COVID-19 like symptoms including: A recent loss of taste and/or smell with no other explanation A fever of at least 100.4°F with a new unexplained cough associated with shortness of breath	<b>Yes</b>
Do you have a policy to notify employees within 24 hours, if required to do so, when they have been exposed (through close contact or by working in the same well-defined portion of a workplace during a person's potential transmission period) to a COVID-19 positive person who has been in the workplace?	<b>Yes</b>
Is the HVAC system being checked, inspected, cleaned, and maintained on a regularly scheduled basis?	<b>Yes</b>
Is the HVAC system being used in accordance with the HVAC manufacturer's instructions and design specifications?	<b>Yes</b>
Is the HVAC system set to maximize the amount of fresh outdoor air that is supplied to the system within the system's capabilities?	<b>Yes</b>
Are the HVAC outdoor air intakes clean, are they in good working order, and are they clear of obstructions?	<b>Yes</b>
Are the HVAC air filters that are installed rated at least Minimum Efficiency Reporting Value (MERV) 13, or the highest level compatible with the system?	<b>Yes</b>
Are all air filters maintained and changed as necessary in accordance with the manufacturer's instructions for proper HVAC system function?	<b>Yes</b>
Are all air supply diffusers and return air grilles open, clean, and operating properly?	<b>Yes</b>



### **Appendix 4 – Patient Screening and Management:**

#### **Screening**

Parents/caregivers should be strongly encouraged to monitor their children for signs of illness every day as they are the front line for assessing illness in their children. For 2021-2022:

- Yearly Screening Form (students and employees) - administered through Genesis
- Signs/Symptoms/Protocols
- Directions to parents/caregivers, students, and employees for reporting symptoms and reasons for absences

The screening form is subject to change as governing health authorities may issue new guidelines.

#### **Exclusion**

- Parents should not send students to school when sick. For school settings, NJDOH recommends that students with the following symptoms be promptly isolated from others and excluded from school:
- At least two of the following symptoms: fever (measure or subjective), chills, rigors (shivers), myalgia (muscle aches), headache, sore throat, nausea or vomiting, diarrhea, fatigue, congestion, or runny nose; OR
- At least one of the following symptoms: cough, shortness of breath, difficulty breathing, new olfactory disorder (smell), or new taste disorder.

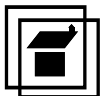
#### **Response to Symptomatic Students and Staff Members**

Schools should ensure that procedures are in place to identify and respond to a student or staff member who becomes ill with COVID-19 symptoms.

- Designate an area or room away from others to isolate individuals who become ill with COVID-19 symptoms while at school.
- Consider an area separate from the nurse's office to be used for routine visits such as medication administration, injuries, and non-COVID-19 related visits.

The school nurse will examine the pupil or staff member and, in consultation with the school medical inspector if the individual's condition so indicates, recommend to the Principal their exclusion from school for medical reasons.

- In the event neither the school nurse or the school medical inspector is available to be consulted about the pupil's condition, the Principal may determine to exclude the individual from school.
- The parent, adult family member, or other responsible adult designated by the parent will be promptly notified by telephone of the pupils' exclusion and requested to come to school and pick up the pupil.
- Until the adult arrives to remove the pupil, the pupil will be kept in an isolated location in the school and will be made as comfortable as possible.
- The pupil will be supervised at all times by a school staff member (employees can leave work at the direction of the School Nurse and Principal)



### Appendix 5 – Standard and Transmission-Based Precautions:

#### Supplies and Equipment

- Ensure adequate supplies (i.e. classroom supplies, equipment) to minimize sharing of high-touch materials or limit use of supplies and equipment by one group of students at a time and clean and disinfect routinely and preferably between use.
- Encourage hand hygiene practices between use of shared items.
- Discourage use of shared items that cannot be cleaned and disinfected

#### Airflow

Improve airflow to the extent possible to increase circulation of outdoor air, increase the delivery of clean air, and dilute potential contaminants. This can be achieved through several strategies:

- Bring in as much outdoor air as possible.
- If safe to do so, open windows and doors.
- Use child-safe fans to increase the effectiveness of open windows.
- Use exhaust fans in restrooms and kitchens.
- Consider having activities, classes, or lunches outdoors when circumstances allow.
- Open windows in buses and other transportation, if doing so does not pose a safety risk.



### Appendix 6 – Personal Protective Equipment (PPE):

- [Executive Order No. 251](#) - Effective Monday, August 9
- Requires all students, educators, staff, and visitors to wear face masks indoors (including school buses) for the start of the 2021-2022 school year.
- While masks will be broadly required in school buildings for the coming school year, exceptions will remain unchanged from the 2020-2021 school year, and include:
  - When doing so would inhibit the individual's health, such as when the individual is exposed to extreme heat indoors;
  - When the individual has trouble breathing, is unconscious, incapacitated, or otherwise unable to remove a face covering without assistance;
  - When a student's documented medical condition or disability, as reflected in an Individualized Education Program (IEP) or Educational Plan pursuant to Section 504 of the Rehabilitation Act of 1973, precludes use of a face covering;
  - When the individual is under two (2) years of age;
  - When an individual is engaged in an activity that cannot be performed while wearing a mask, such as eating and drinking or playing an instrument that would be obstructed by the face covering;
  - When the individual is engaged in high-intensity aerobic or anaerobic activity;
  - When a student is participating in high-intensity physical activities during a physical education class in a well-ventilated location and able to maintain a physical distance of six feet from all other individuals; or
  - When wearing a face covering creates an unsafe condition in which to operate equipment or execute a task
- Individuals seeking a medical exemption from mask wearing pursuant to certain exceptions outlined in [Executive Order No. 251](#) for all public, private, and parochial preschool programs and elementary and secondary schools, including charter and renaissance schools, will be required to produce written documentation from a medical professional to support that exemption. Self-attestations and parental attestations are not sufficient.
- **Outdoors:** In general, people do not need to wear masks when outdoors. The CDC recommends that people who are not fully vaccinated wear a mask in crowded outdoor settings or during activities that involve sustained close contact with other people. Fully vaccinated people might choose to wear a mask in crowded outdoor settings if they or someone in their household is immunocompromised.



**Appendix 7 – Physical Distancing:**

- The School Nurse Offices will have kiosks for check-in and check-out.
- Beds in the offices will be spread out to ensure distancing between students.





## **Appendix 8 – Physical Barriers:**

- As an extra precaution, physical barriers are set up in between student beds and the nurses station.



### Appendix 9 – Cleaning and Disinfecting:

#### **Cleaning and Disinfection**

Schools should follow standard procedures for routine cleaning and disinfecting with an EPA-registered product for use against SARS-CoV-2. This means at least daily cleaning and disinfecting surfaces and objects that are touched often, such as desks, countertops, doorknobs, computer keyboards, hands-on learning items, faucet handles, phones, and toys.

- If a person exhibits COVID-19 compatible symptoms or tests positive for COVID-19 within 24 hours of being in the school building, school staff should clean and disinfect the spaces occupied by the person.
- Close off areas used by the person who is sick or positive and do not use those **areas until after cleaning and disinfecting.**



### 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.**

*(e.g., Maintenance employee, HVAC service contractor(s))*

<u>Name/Contact Information:</u>  <b><u>West Essex HVAC Staff Member and Trane</u></b>	<u>Location:</u>  <i>High School</i>
<u>Name/Contact Information:</u>  <b><u>West Essex HVAC Staff Member and DaLor</u></b>	<u>Location:</u>  <i>Middle School</i>



### **Appendix 11 – Health Screening and Medical Management for Employees:**

- All staff members will complete a yearly COVID-19 Screening Form.
- Staff are to report all absences related to COVID-19 to their respective school nurse.
- Each school nurse will notify any staff member of a potential COVID-19 Exposure after contact tracing has been completed.



**Appendix 12 – Medical Removal Protection Benefits:**

- The School Nurse is entitled to use their paid sick and personal leave during their absence.



### **Appendix 13 – Vaccinations:**

- The district ran an on-site vaccine clinic in September that allowed staff members to get vaccinated on-site.
- If an employee has side effects from their vaccine, they can use their paid sick or personal time to stay home.



**Appendix 14 – Training:**

All staff members were supplied with The Road Forward Health and Safety Protocols. Information and Resources are accessible on our school district website.

