

POLICY GUIDE

ADMINISTRATION
1648.14/page 1 of 10
Safety Plan For Healthcare Settings In
School Buildings – COVID-19
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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.



POLICY GUIDE

ADMINISTRATION

1648.14/page 2 of 10

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

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.**

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 settingst 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.**



POLICY GUIDE

ADMINISTRATION

1648.14/page 3 of 10

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

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.



POLICY GUIDE

ADMINISTRATION

1648.14/page 4 of 10

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

- 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**



POLICY GUIDE

ADMINISTRATION

1648.14/page 5 of 10

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

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.



POLICY GUIDE

ADMINISTRATION

1648.14/page 6 of 10

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

- 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.



POLICY GUIDE

ADMINISTRATION

1648.14/page 7 of 10

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

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.



POLICY GUIDE

ADMINISTRATION
1648.14/page 8 of 10
Safety Plan For Healthcare Settings In
School Buildings – COVID-19

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. The log of COVID related cases/exposures is maintained with essential personnel having access to it for the daily operation of the school.**
 - 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.**



POLICY GUIDE

ADMINISTRATION

1648.14/page 9 of 10

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

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;**



POLICY GUIDE

ADMINISTRATION
1648.14/page 10 of 10
Safety Plan For Healthcare Settings In
School Buildings – COVID-19

- 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:
1st Reading: 18 November 2021



POLICY GUIDE

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

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

Facility Location	Worksite-Specific COVID-19 Considerations
Triton Regional High School Room F-5 Nurse’s Office	<ul style="list-style-type: none">• Room is equipped with HEPA air filtration system, cleaning supplies, hand sanitizing station, and physical barriers.• An adequate supply of PPE is maintained within the room at all times.
Highland Regional High School Room E101 Nurse’s Office	<ul style="list-style-type: none">• Room is equipped with HEPA air filtration system, cleaning supplies, hand sanitizing station, and physical barriers. <p>An adequate supply of PPE is maintained within the room at all times.</p>
Timber Creek Regional High School Room C-11 Nurse’s Office	<ul style="list-style-type: none">• Room is equipped with HEPA air filtration system, cleaning supplies, hand sanitizing station, and physical barriers. <p>An adequate supply of PPE is maintained within the room at all times.</p>



POLICY GUIDE

Appendix 2 – Vaccination Status Plan:

Per Executive Order No. 253, all school personnel are required to be fully vaccinated against COVID-19 by October 18, 2021 or be subject to COVID-19 testing at minimum one to two times per week. All school personnel will be required to submit a copy of their official COVID-19 vaccination record to the Assistant Superintendent's office. Personnel that are unable to produce a vaccination record will be subject to weekly testing per Executive Order No. 253.

Staff who do not produce a vaccination record will submit weekly testing evidence by Monday morning of each week they are not vaccinated after October 18, 2021.



POLICY GUIDE

Appendix 3 – Completed Hazard Forms and Results:

A coordinated effort will be made to complete a Hazard Assessment and the results will be available upon request to the Business Administrator.



POLICY GUIDE

Appendix 4 – Patient Screening and Management:

- **Points of entry will be limited for each setting with foot traffic monitored to ensure minimal interaction with students/parents.**
- **Additional rooms has been made available within each setting to maintain student/patient privacy.**
- **If feasible, students/patients will be asked to remain outside until they are called into the setting to reduce crowding or exposure.**



POLICY GUIDE

Appendix 5 – Standard and Transmission-Based Precautions:

- **We have established designated isolation rooms in each high school.**
- **We have supplied an appropriate amount of Personal Protective Equipment, including gloves, masks, and gowns.**
- **We are using disposable or specific patient care equipment.**
- **We are cleaning and disinfecting rooms as per CDC guidelines.**



POLICY GUIDE

Appendix 6 – Personal Protective Equipment (PPE):

- **Facemasks and additional Personal Protective Equipment have been provided to all staff.**
- **Additional supplies of Personal Protective Equipment and cleaning supplies are also available if a staff member's supply is low.**



POLICY GUIDE

Appendix 7 – Physical Distancing:

- **Signs and floor markings to indicate social distancing have been deployed.**
- **Isolation rooms have been designated in each high school for those displaying signs and symptoms of COVID-19. Additional rooms have been made available for lunch service to emphasize physical distancing.**
- **Signage is displayed in corridors, meeting rooms, stairways, entrances, seating, and exits to establish social distancing limits.**
- **Students will be spaced to the greatest extent possible, understanding that 6 feet of social distancing is not possible with all students returning to school. In classrooms, students will be spaced to the greatest extent possible in classrooms.**



POLICY GUIDE

Appendix 8 – Physical Barriers:

Where applicable, physical barriers will be installed or made available when physical distancing cannot be consistently maintained and spacing cannot be increased.



POLICY GUIDE

Appendix 9 – Cleaning and Disinfecting:

Washing Hands is recommended periodically through the school day. Some are suggesting in between each class, but especially before and after eating. Prepare and maintain hand sanitizing stations with alcohol-based hand sanitizers (at least 60% alcohol):

- In each classroom (for staff and older children who can safely use hand sanitizer).
- At entrances and exits of buildings.
- Near lunchrooms and toilets.
- For classrooms that have existing handwashing stations, prepare stations with soap, water, and alcohol-based hand sanitizers (at least 60% alcohol).

Students should wash hands for at least 20 seconds at regular intervals, including before eating, after using the bathroom, and after blowing their nose/coughing/sneezing. Use alcohol-based hand sanitizer (at least 60% alcohol) if washing with soap and water is not possible.

Cleaning and maintaining healthy facilities, including improving ventilation:

We will follow the [CDC recommendations for cleaning](#). Each custodian will certify that they have done so in every area they clean and complete a room checklist every night. A schedule will be designed and provided to staff to ensure all spaces are cleaned. We will provide significant cleaning and sanitizing every evening. All A/C filters are changed per the specs of the product. All systems have a fresh air component. Windows can be opened as needed and fresh air dampers can be adjusted as needed. Each room will have hand sanitizer and those classrooms where materials are shared, like keyboards or computer mice, will have disinfectant so that students can clean after and/or before use. Classrooms and offices will also have air purification systems.

As noted in The Road Back Department of Health guidance, if a positive COVID-19 case emerges, all areas affected will be closed for use, then cleaned and sanitized as soon as recommended (after several hours).



POLICY GUIDE

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>	<u>Location:</u>
Robert Mortka, Highland High School Foreman	Highland
Walt Wright, Triton Regional High School Foreman	Triton
Robert Marchese, Timber Creek High School Foreman	Timber Creek

Individual classroom ventilation systems are equipped with MERV 7 filters (where possible) and are equipped with air filtration portable systems. These filters are replaced in accordance with the manufacturer recommendations. The building's HVAC control system is programmed to allow an adequate level of fresh air to enter the building.



POLICY GUIDE

Appendix 11 – Health Screening and Medical Management for Employees:

- **The school district requires employees not vaccinated in accordance with Executive Order No. 253 by October 18, 2021 to produce weekly COVID-19 negative test results to the School District.**
- **Employees must notify the school district if they are sick or experiencing symptoms while at home or at work in a timely manner.**
- **Employees are encouraged to stay home when they are sick, when household members are sick, or when required by a healthcare provider to isolate or quarantine themselves or a member of their household, to reduce the risk of transmission.**
- **Employees are notified via email or telephone of positive COVID-19 cases and are informed of any identified close contacts.**
- **Employees who are identified as a positive COVID-19 case will be required to leave the premises immediately and the process of contact tracing will begin at this point. School nurses or administrators are responsible for contact tracing.**
- **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.”**



POLICY GUIDE

Appendix 12 – Medical Removal Protection Benefits:

- **Employers must continue to provide the benefits to which the employee is normally entitled and pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to \$1,400 per week per employee. For employers with fewer than 500 employees, the employer must pay the employee up to the \$1,400 per week cap but, beginning in the third week of an employee’s removal, the amount is reduced to only two-thirds of the same regular pay the employee would have received had the employee not been absent from work, up to \$200 per day (\$1000 per week in most cases).**
- **The ETS also provides that the employer’s payment obligation is reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave), for earnings lost during the period of removal or any additional source of income the employee receives that is made possible by virtue of the employee’s removal.]**



POLICY GUIDE

Appendix 13 – Vaccinations:

The Black Horse Pike Regional School District has offered four (4) vaccination clinics to assist the community, staff, and students to get vaccinated. We helped facilitate the vaccination of over 600 individuals. We have encouraged all staff and students to get vaccinated through our District Newsletters, all-calls, and messaging.

For those staff members who are not vaccinated, they will have to submit weekly COVID-19 testing results to the Assistant Superintendent's Office in accordance with Executive Order No 253 every Monday morning.

Failure to do so will result in employment action, which may include a report filed with the local police department, an increment withholding, tenure charges filed, or some other employment action, up to and including releasing the individual from employment.



POLICY GUIDE

Appendix 14 – Training:

1. **The school district will ensure that each employee receives 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;**
 - (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;**



POLICY GUIDE

- f. **The school district's procedures for PPE worn to comply with the ETS, including:**
 - (1) **When PPE is required for protection against COVID-19;**
 - (2) **Limitations of PPE for protection against COVID-19;**
 - (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.**
 - (1) **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.**



POLICY GUIDE

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.**

