

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.



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- 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.

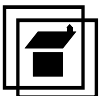


C. Hazard Assessment and Worker Protections

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.



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- 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



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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

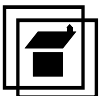
1. The school district will implement policies and procedures for employee training, along with the other provisions required by the ETS, as part of a multi-layered infection control approach.
2. The school district will include protocols to address training for employees in Appendix 14.

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





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- 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.

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: 15 March 2022



## 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>
OHES Nursing.Health Office	Personal Protective Equipment, Physical Barriers, Social Distancing Protocols, Appropriate Signage, Isolation Areas
VES Nursing.Health Office	Personal Protective Equipment, Physical Barriers, Social Distancing Protocols, Appropriate Signage, Isolation Areas
LMS Nursing.Health Office	Personal Protective Equipment, Physical Barriers, Social Distancing Protocols, Appropriate Signage, Isolation Areas
UMS Nursing.Health Office	Personal Protective Equipment, Physical Barriers, Social Distancing Protocols, Appropriate Signage, Isolation Areas
MHS Nursing.Health Office	Personal Protective Equipment, Physical Barriers, Social Distancing Protocols, Appropriate Signage, Isolation Areas



## **Appendix 2 – Vaccination Status Plan:**

The Human Resources Department will disseminate a survey to all staff requesting their vaccination status and a copy of the employee's vaccination card or appropriate substitute, if applicable.

Human Resources will maintain the confidential list and will update the list accordingly.

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

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.

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 appendices to follow.



## Appendix 4 – Patient Screening and Management:

The district nursing staff, in collaboration with the district physician, implement the BOE adopted *School Physician's Standing Orders for Treatment of the Ill or Injured Student*. Specific timelines may change upon guidance from local and state recommendations. The standing order COVID-19 Addendum is as follows:

### PPE

- Health office staff to utilize PPE as necessary: mask, face shield, gloves, gown, face shield and gown is necessary if the student/staff requires close contact for assessment.

### Aerosol Generating Procedures (AGP)

- During COVID-19, nebulizer treatments will not be administered during school
- PRN inhalation medication will be administered using an MDI, with or without a mask and spacer (a spacer is not used with a dry powder inhaler.)

### Student/Staff Health Assessments

- For school settings, NJDOH recommends that students and staff with the following symptoms be promptly isolated from others and excluded from school:  
\*\*\*COVID-19 compatible symptoms
  - 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, new taste disorder.

### Isolation Room Procedure

- Sick students/staff isolated in a non-threatening manner, within the line of sight of a healthcare provider or delegated staff member.
- Monitoring staff should wear situational appropriate PPE
- Sick students/staff must wear the appropriate type of face covering. With persistent forceful coughing mask and face shield should be worn.
- If multiple sick students or staff are isolated in the same area, they must remain at least 6 feet apart.

If a 911 call is necessary, alert the operator that the student may have been exposed to someone with COVID-19.



Procedure for Confirmed, Probable or Possible Case - Students and Cohorts - example: homeroom, pull out classes, bus, before/after school care. Isolation and quarantine guidelines may change throughout the school year depending on the CDC, NJDOH and MTDOH guidance.

1. Confirmed Case w/ Symptoms- positive viral test (verified by MTHD or parents-confirmed with HCP note)
  - a. The Confirmed Case must stay home at least 10 days since symptoms first appeared AND until no fever for at least 24 hours without medication AND improvement of other symptoms. If the student never had symptoms, then they must stay home for at least 10 days from the day the test was performed.
  - b. The student will need documentation of positive test results and completion of COVID-19 daily screening form for re-entry. Further clearance will be needed for all students involved in school sponsored sports.
  - c. MTDOH in conjunction with MTSD school physician, MTSD administration, Safety and Security officer and school nurses will perform contract tracing and decide on quarantine for any household or school exposures. Students who are advised to quarantine from the public health department may not return to school until the quarantine has been completed.
  
2. Probable Case- symptoms with a known exposure in the past fourteen days.
  - a. The Probable Case is referred to HCP for follow-up and recommended COVID-19 viral testing.
  - b. The Montgomery Public Health office is notified by the school nurse.
  - c. May return to school:
    - o After Day 10 without testing and if no symptoms have been reported during daily monitoring, OR
    - o After Day 7 if the individual tests negative with a viral test (molecular-PCR or antigen) between day 5-7 and if no symptoms were reported during daily monitoring.
    - o *Note:* The specimen must be collected between day 5-7 (not earlier than day 5), but quarantine cannot be discontinued earlier than after Day 7. The person should remain in quarantine until the results are received and are negative. If test results are delayed, quarantine should be continued until after Day 10.



- MTDOH in conjunction with MTSD school physician, MTSD administration, Safety and Security officer and school nurses will decide on quarantine for any household or school exposures. Students who are advised to quarantine from the public health office may not return to school until the quarantine has been completed.
- d. Possible Case- symptoms but no known exposure while we are in Low or Moderate Risk region per NJDOH.
  - The Possible Case must remain home for 10 days. OR
  - Students may return to school earlier than 10 days if they have proof of a negative COVID-19 test result and symptoms improve for over 24 hours without the use of any medication.



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

1. Administrative Responsibilities
  - a. The district incorporates appropriate training and education to the nursing staff and general staff regarding standard and transmission-based infection control precautions.
  - b. Nursing staff and administrators meet regularly with the district physician and the township health department.
  - c. The district develops and implements policies and procedures to limit visitation by persons with signs of symptoms of communicable infection.
  - d. The district develops and implements processes to ensure oversight of infection control in the nursing health offices.
  - e. The district, in areas where healthcare is delivered, provides supplies and equipment necessary for the consistent observance of Standard Precautions, including hand hygiene products and personal protective equipment (e.g., gloves, gowns, face, and eye protection).
2. Education and Training
  - a. The district provides job-specific education and training on preventing transmission of infectious agents associated with healthcare.
  - b. Nursing staff and administrators meet regularly with the district physician and the township health department.
  - c. The nursing staff and administrators have access to professional development and membership opportunities to professional associations.
3. Surveillance
  - a. The district uses standardized definitions of infection.
  - b. The district uses laboratory-based data when available and data provided by the local health agency, county, and state.
  - c. The district regularly reviews information on community or regional trends.
4. Hand Hygiene
  - a. District nursing staff perform hand hygiene in clinical situations including:
    - Before having direct contact with students
    - After contact with blood, bodily fluids or secretions, mucous membranes, non-intact skin, or wound dressings.
    - After contact with a student's intact skin.
    - After removing gloves.

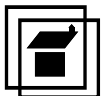


- After contact with inanimate objects in the immediate vicinity of the patient.
  - Adhere to the frequent washing of hands.
5. Respiratory hygiene/cough etiquette
- a. Instruct symptomatic persons to cover mouth/nose when sneezing/coughing; use tissues and dispose in receptacle appropriately; observe hand hygiene after soiling of hands with respiratory secretions; wear mask if tolerated or maintain spatial separation, >3 feet if possible.

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

District nursing staff are equipped with and wear PPE in adherence to local, state, and federal guidelines. PPE includes but is not limited to the regular and appropriate use of:

- Masks
  - (N95 fit-tested masks are provided by the district)
- Gloves
  - Properly fitted and with a durability appropriate to the task
- Gowns
  - Appropriate donning and removal procedures are followed
- Mouth, nose, eye protection





## **Appendix 7 – Physical Distancing:**

In consideration of the possibility of transmission of infectious agents, for screening and seclusion purposes during the school day, nurses will utilize health offices or an auxiliary nursing location staffed by health professionals.

Staff and students who are presenting symptoms of being sick will be screened and sent home as soon as possible if positive potential symptoms are identified. Each will feature an isolation area where staff/students will be at a minimum 6 feet away from others, wearing appropriate PPE, and will be continuously monitored.

Physical distancing will be adhered to throughout the nursing health offices and auxiliary nursing locations. The nursing health offices will utilize physical barriers and signage to implement physical distancing protocols.

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

Throughout the district, physical barriers including Plexiglas partitions are installed in areas in which appropriate physical distancing cannot be consistently maintained and spacing cannot be increased. Throughout the health offices, the desks of the school nurses are equipped with Plexiglas barriers and student isolation areas were established with the use of physical barriers and dividers.



## **Appendix 9 – Cleaning and Disinfecting:**

The District will continue to clean and disinfect all rooms in all schools daily. The District purchased disinfecting products and equipment, including sanitizing sprayers, dedicated microfiber cloths, and dedicated microfiber cloth washing machines. Custodians have been trained in the use of new cleaning products and proper cleaning methods. District will continue to purchase these cleaning supplies & equipment, and conduct audits of custodial cleaning results. The district employs full time, dedicated, and qualified Heating, Ventilation, Air Conditioning (HVAC) technicians to monitor and maintain building HVAC equipment daily. The district has (and will continue to) upgrade building HVAC control systems, purchase high quality HVAC filters, and increase the frequency of HVAC filter changes. HVAC fresh air levels have been increased, and windows have been serviced to allow improved ventilation.

## **Appendix 10 - Ventilation:**

The following individual(s) is responsible for maintaining the HVAC system(s) and can verify that it is operating in accordance with the ventilation provisions of OSHA's COVID-19 ETS.	
Keith Smith (HVAC)	District
Dave Sellyei (HAVC)	District
Ian McClintock (HVAC)	District
Michael O'Neill (Facilities)	District
Wayne Robinson (Facilities)	District



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

Human Resources will provide staff with CDC prepared COVID-19 symptoms list and require they self-screen daily.

Human Resources is available to employees who have questions.

Staff that have identified as being unvaccinated or prefer not to answer, will provide weekly COVID-19 tests as per NJ Executive Order 253.

Human Resources will notify staff who are deemed close contacts of staff or students who have tested positive for COVID-19 and provide further quarantine/isolation guidance.

The school district provides a COVID-19 dashboard on their website that is updated based on staff and student positive cases reported to the district.

Building and/or department administration informs their related staff of positive cases on their campus.

Staff who report experiencing COVID-19 symptoms are directed to remain home (or leave the building) and consult with their own physician.

Protocols for return to work criteria will be developed and updated regularly in consultation with the school district physician, local and state health departments, the CDC, administration and other relevant agencies.

Protocols for return to work are provided to all employees and updated as they change.

Employees are required to notify Human Resources of COVID-19 illness or symptoms.



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

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 this appendix.

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. The school district shall be in compliance with all requirements as dictated by OSHA as it relates to ETS.

## **Appendix 13 – Vaccinations:**

The district will provide reasonable paid time to employees for the purpose of obtaining vaccinations.

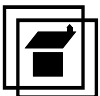
Employees are encouraged and entitled to use the personal sick time and/or other benefits provided by the State or Federal government if experiencing side effects following vaccination.



## Appendix 14 – Training:

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;



- 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.
- (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.

