



Infectious Disease Preparedness & Response Plan (Emergency Temporary Standard)

Policies & Procedures for Operations During an Infectious Disease Health Crisis

Purpose: Policies & procedures to operate during an infectious disease pandemic. The school must mitigate risk to staff and students while delivering quality education. In many cases, the control measures in place will change in severity throughout the crisis and should take local and state guidelines into account. Use the [Infectious Disease Response Log](#) to document the specifics related to the current crisis and changes. Many states Virginia being the first, have set forth Emergency Temporary Standards of operations to protect employees during the pandemic. These policies must be followed by all employees, subcontractors, 1099 employees, and those who rent space in the school because all share the same workspace.

New Policy

Revised Policy

Date Implemented _____ 09/01/2020 _____

Infectious Disease Compliance Officer _____ Asma Shahab _____

Emergency Temporary Standard

Employer must:

- Control, prevent, and mitigate the spread of SARS-CoV-2 and COVID-19 to and among employees and students.
- Workplace Hazard Assessment to identify risk level, locations, and job duties that may be affected.
- Adopt a Preparedness and Response plan to mitigate the risks discovered in the Workplace Hazard Assessment.
 - Develop policies and procedures to mitigate risk
 - Assign a staff member to ensure compliance
 - Train staff
 - Uphold policies

Definitions

Current Crisis: COVID 19

- **SARS-CoV-2:** The virus that causes the Coronavirus Disease 2019 (**COVID-19**).
- **COVID-19:** Coronavirus Disease 2019, which is primarily a respiratory disease.

- **May be infected with SARS-CoV-2:** Person who may have been exposed because
 - They have been in contact with a known or suspected COVID19 person
 - They have traveled to an area with substantial (controlled or uncontrolled) ongoing community transmission and had contact under 6 feet for more than 15 min.
- **Suspected COVID-19:** A person that is COVID-19 symptomatic but has not tested positive.
- **Known COVID-19:** A person who tested positive (either symptomatic or asymptomatic).
- **Asymptomatic:** Tested positive but shows no symptoms.
- **Symptomatic:** Experiencing symptoms.
- **Symptoms of COVID:** Fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, the new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea.
- **The Quarantine Period** for COVID is 14 Days.
- **Symptoms may occur** 2 to 14 days after exposure to the virus.
- **Confirmed person WITH SYMPTOMS can be around others:** (updated July 26, 2020)
 - 10 days after symptoms first appeared
 - At least 72 hours with no fever without fever-reducing medication and
 - Symptoms have improved.
- **Confirmed person WITH SYMPTOMS ADMITTED TO HOSPITAL can be around others:**
 - 20 days after symptoms first appeared or 2 negative tests results (24 hours apart)
 - At least 72 hours with no fever without fever-reducing medication and
 - Symptoms have improved
- **Positive test no symptoms may be around others:** 10 days after their first positive test.

General Definitions

- **Employee or staff:** Those who work directly for the school, temporary employees, volunteers, interns, and 1099 staff.
- **Cleaning:** The removal of dirt and germs, from surfaces.
- **Disinfecting:** Using chemicals approved to kill germs on surfaces after cleaning.
- **Administrative Control:** Procedure changes to the work schedule or how work is performed which limits daily exposure.
 - **Work school control** (subset of Admin) employer makes changes to how the employee performs the job.
 - Changing work habits, improving sanitation and hygiene practices.
- **Engineering Control:** Use of substitution, isolation, ventilation, and equipment modification to reduce exposure.
- **Face covering or mask:** An item made of cloth that fits securely over the nose and mouth. (there is no government approval and is not considered a form of PPE)
- **Face shield:** A form of PPE made of transparent, impermeable materials to protect the entire face.
- **Physical Distancing Or Social Distancing:** keeping 6ft of space between two people
- **Duration and Frequency of Exposure:** how long (“duration”) and how often (“frequency”) an employee or patient is potentially exposed.
 - The greater the frequency or length of exposure, the greater the probability is for potential infection to occur.
 - Limit exposure duration to under 15 min.
 - Use masks and distancing for greater protection.
- **Exposure Risk Level:** possibility of exposure for employees

- o **Very High:** Jobs that require contact with **known or suspected sources or persons.** (such as lab samples or locations with aerosol-generating procedures.)
- o **High:** Jobs that require contact inside six feet **with known or suspected COVID -19 sources or COVID-19 persons.**
- o **Medium:** jobs that require contact inside six feet with those who are **are not known or suspected COVID-19.**
- o **Low:** Jobs that do not require contact inside six feet with people. Such as floor to ceiling clear plastic walls or telecommuting.
- o Factors in determining the risk level.
 - The suspected or known presence of COVID
 - The working distance between employees & between employees and student
 - Duration and frequency of contact within 6 feet
 - Potential exposure areas: contained surfaces, shared workstations, breakrooms

Infectious Disease Preparedness & Response Plan

1- Implement Basic Infection Prevention Measures

- a. **Stay Informed:** This school will check federal, state, and local resources frequently for updates related to the spread of the disease. Policies and procedures will be modified as needed. Resources may include but not limited to CDC Guidance, OSHA, State & County Health Department Regulations, State Government Orders that regulate operations, State Chiropractic Board Recommendations.
- b. **Workplace Hazard Assessment: Identify & Define the Risk Level.**
 - i. **Who May Be At Risk?** This policy will protect employees and students.
 - ii. **Risk Level**
 - 1. **Identify Exposure Sources for Employees or Student**
 - a. **Where:** reception area, classrooms, gym areas & equipment, restrooms, hallways
 - b. **How:** come in contact with an infected individual or surface
 - c. **What Sources:** airborne & surface contact
 - 2. **Identify Risk Levels:** As defined by OSHA & US Department of Labor there are two exposure risk levels within the school. (See Definitions for more details)
 - a. **Lower:** Working in non-public areas with no contact with students, minimal contact with other staff.
 - b. **Medium:** Providing instruction or face to face with students who are **not known or suspected COVID-19.**
 - iii. **Training Specific to Current Crisis:** Staff will receive continuous training for the duration of the health crisis including but not limited to:
 - 1. The symptoms of the current infectious disease.
 - 2. How the disease is spread.
 - 3. Prevention measures that will be used to protect the staff and students.

2- Prevention Measure: Screening for Identification of Sick People

- a. **Screening Staff** - Staff will be screened daily before beginning their shift. Those with possible exposure or who exhibit symptoms will immediately start [Testing & Quarantine Procedures](#).
 - i. Staff will use the [Employee Screening Log](#) to document staff screening.
 - 1. Temperature checks: those with a fever will start [Testing & Quarantine Procedures](#)
 - 2. Employee Self-Review

- a. Do I have symptoms (see definitions)?
- b. Have I been in contact with anyone with symptoms or has tested positive?
- c. Have I traveled to an area with substantial (controlled or uncontrolled) ongoing community transmission and had contact with a person inside six feet for 15 min?
- ii. Employee Transparency
 - 1. Employees have a responsibility to the school and the student to be truthful in their self-review.
 - 2. Employees' jobs are safe if quarantine is needed and may return to work after [Testing & Quarantine Procedures](#) are completed.
- b. **Screening Student**
 - i. Signs posted on door, website & social media.
 - 1. Stop here if you Have fever(100.4), cough, or difficulty breathing.
 - 2. Have been in close contact with someone who may be infected by the disease.
 - 3. Have recently traveled to areas with high infection rates.
 - 4. Instructing them to: Do not enter school. Return to your vehicle. Call your medical physician for instructions. Follow your doctor's orders.
 - 5. Students may return 10 days or a negative test result.
 - ii. Upon entry of school
 - 1. Will follow local and State Guidelines.
 - 2. Temperature screening: those with a fever will be asked to go home.
 - 3. Screening questions if appropriate for signs and symptoms. (same as posted)

3- Prevention Measure: Workplace Protections

- a. **Employee Policies**
 - i. Employees are required to have open communication with administrators.
 - ii. Employees have an obligation to the school to disclose if they believe they have been in contact with an infected person.
 - iii. Employees will be screened before work each day and they have a responsibility to the school and the student to be truthful.
 - iv. Employees understand they will need to follow [Test & Quarantine Procedures](#).
 - v. Employees' jobs are safe if quarantine is needed and may return to work after [Testing & Quarantine Procedures](#) are completed. However, failure to follow the policies may result in disciplinary action.
 - vi. Employees have a responsibility to use masks and social distancing even when not at work to mitigate their exposure.
 - vii. Employees will refrain from discussing the crisis with students. If the student directly asks the employee, all employees will portray a calm attitude and not encourage or spread rumors, false information, or instigate heated discussion that may cause alarm.
 - viii. Employees will be responsible for screening the student.
 - ix. Employees will work as a team to cover staffing challenges and may have expanded responsibilities.
 - x. All employees will need to carry out sanitizing and other protective measures as instructed.
 - xi. Employees should disinfect workstations and classrooms before use. When possible not share workstations or phones.
 - xii. Employees who have traveled to an area with substantial (controlled or uncontrolled) ongoing community transmission will need to quarantine for 14 days or obtain a negative test result before returning to work.
 - xiii. Employees understand that Privacy and all HIPAA requirements are in effect. This is an area of public health and safety; employees will be required to provide test results for our records. These **may not** be shared with other staff or students and may not be used in your employee file.

- xiv. OSHA guideline states an “employees may refuse work if they reasonably believe they are in imminent danger.” That fear typically includes the threat of death or serious physical harm. Generalized fear about the virus is not sufficient to refuse to work. **(OSHA says COVID-19 does not qualify.)**
- b. **Workplace Controls**
 - i. **Engineering Controls:** Add controls to ensure safety as possible. Examples may include, ventilation, high-efficiency air filters, social distancing signage, and plastic barriers.
 - ii. **Admin Controls:** The school will enforce employee policies related to the prevention of infectious disease as outlined. Mandatory training will be held frequently as crisis changes. Employees will be required to attend and follow all guidelines as outlined in this document. Failure to comply with these policies & procedures and all additional measures added according to federal, state, or local guidance will result in disciplinary procedures.

4- Prevention Measure: Facility Controls & Safe Work Schools

Modifications to instructions, the physical layout of school, and sanitization will be needed throughout the crisis. These changes may be gradually lifted as the crisis is resolved. These changes will need to be documented on the [Infectious Disease Response Log](#).

- a. **Student instruction changes**
 - i. Masks: Students will be required to follow current regulations regarding masks. Masks may be optional, encouraged, or required. The policy may change during the duration of the crisis and will be documented on the [Infectious Disease Response Log](#).
 - ii. Classrooms: Students may be asked to wait in their car/gym/foyer while getting their temperature taken to decrease wait time within the school. They may call or text upon arrival and then are instructed when it is their turn to enter the school.
 - iii. Limiting people within the school building: Only students may enter the school unless the parent has made prior appointments with teachers or administrators. Specific guidelines may be recorded on the [Infectious Disease Response Log](#) and updated throughout the crisis.
 - iv. Occupancy limits: School will follow current state and local guidelines details may be recorded on the [Infectious Disease Response Log](#) and updated throughout the crisis. Appointment scheduling will be adjusted as needed.
 - v. Staggered arrival and departure times: To limit students arriving or departing at the same time the school may use staggered arrival or release times as needed.
 - vi. Confirmation of completed symptom survey
- b. **Physical Changes**
 - i. Classroom Desks and Chairs: Students will be placed in a manner that none are closer than 6 feet and are not facing each other.
 - ii. Shared closed Spaces: Students will be positioned in these spaces 6 feet apart and not facing each other.
 - iii. One-Way Hallways: If possible, hallways will be labeled as one way or a staff member will direct the movement throughout the school to ensure only one student is traveling in a hallway at the same time.
 - iv. Restrooms: Restrooms will only be used by one person at a time even when space allows for multi-use.
 - v. Administrator Desk: Social distancing will be available. Students may be directed as to where to stand, where to wait, etc. Modifications specific for the crisis will be documented on the [Infectious Disease Response Log](#).
 - vi. Staff Interaction: When possible, the staff will stay 6 feet from a student. Staff will wear masks as outlined in the guidance of federal, state, or local officials.
- c. **Enhanced Sanitizing** While sanitation is a priority all the time; during an infectious disease crisis, the school will add additional precautions. These are a list of procedures that may be needed. Procedures specific for the crisis will be documented on the [Infectious Disease Response Log](#).
 - i. **Student Initiated Sanitizing-** The school will provide additional hand sanitizing stations or locations within the school for students to sanitize upon entry as directed by a staff member.

- ii. **Staff Contact:** All staff will use hand sanitizer before and after class periods insight of the students. Staff will be required to practice good hygiene with frequent sanitizing and hand washing.

5- Responding to a Positive Case

- a. **Students or Employee is Suspected or been in close contact with someone known to be infected.**
 - i. **Employee:** Start [Return to Work after Exposure](#) Procedures. Depending on the level of exposure the employee may be asked to stay home pending 2 negative test results or quarantine for the CDC's recommended period.
 - ii. **Students:** Students will not return until after the 14-day quarantine period from when they alert the school. A negative test result may be required-
 - iii. Staff and Students will be alerted to the situation if they have been in direct contact with the individual. **We will do this through Orbund messages / emails / or phone calls if necessary.**
 - iv. Additional sanitization as per current guidelines will be used in areas where the employee or patient has been.
 - v. All actions will be documented in the [Infectious Disease Response Log](#).
- b. **Student or Employee Tests Positive**
 - i. **Employee:** Send the employee home Start [Return to Work after Exposure](#) Procedures which follow Centers for Disease Control & Prevention guidance.
 - ii. **Student:**
 - 1. **With Symptoms** may return to school 10 days after symptoms first appeared, at least 72 hours with no fever without fever-reducing medication and symptoms have improved.
 - 2. **With Symptoms Admitted To Hospital** may return to school 20 days after symptoms first appeared or 2 negative tests results (24 hours apart), at least 72 hours with no fever without fever-reducing medication and symptoms have improved
 - 3. **No Symptoms** may return to the school 10 days after their first positive test.
 - iii. Notify the employees & students who have been in contact with the infected person. **Do not reveal the name or information of the infected person. HIPAA is in effect.**
 - iv. Sanitize the areas the infected person came into contact with product label to KILL germs. This would include common areas of school. The person(s) who carries out the deep cleaning should wear gloves and a mask.
 - v. If multiple employees or students are positive the school may need to shut down. Follow the CDC guidelines for quarantine and sanitation.
 - vi. Document everything in the [Infectious Disease Response Log](#).
- c. **Serologic test was positive for antibodies.**
 - i. Serologic test results shall not be used to make decisions about returning employees to work who were previously classified as known or suspected.
 - ii. Employees who test positive for antibodies by serologic testing and were not otherwise previously classified as known or suspected COVID-19 will have no restrictions unless symptoms occur. Then follow guidance for suspected persons.

Attachments: All policies follow regulations and recommendations of:

Local Health Department

State Government Orders & Directives

Federal Agency: CDC

Federal Agency: OSHA

Sources:

- Guidance on Preparing the workforce for COVID 19:
<https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-schools.html>

- Advisory memorandum on the identification of essential critical infrastructure workers during COVID-19 response https://www.cisa.gov/sites/default/files/publications/Version_3.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_1.pdf
- Interim Guidance for Implementing Safety Schools for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 <https://www.cdc.gov/coronavirus/2019-ncov/downloads/critical-workers-implementing-safety-schools.pdf>
- COVID-19 - Control and Prevention /Healthcare Workers and Employers <https://www.osha.gov/SLTC/covid-19/healthcare-workers.html>
- Virginia Emergency Temporary Standard
- <https://environmentalsafetyupdate.lexblogplatform.com/wp-content/uploads/sites/248/2020/07/VA-DOL-COVID-19-Emergency-Temporary-Standard-FOR-PUBLIC-DISTRIBUTION-FINAL-7-17-2020.pdf>
- July 26th CDC update <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/isolation.html>

6- Handling Objections to Masking Policies – Section added 8.12.2020

a. Understanding Why to Require Masking

- i. Schools have a duty to provide “reasonably safe public spaces.”
- ii. Unmasked individuals are a risk to others in the school.
- iii. Most state guidelines are **recommending or requiring masks for ALL** who enter.
- iv. Masking policies are setting a qualification to receive care.
- v. Those who do not wear masks do not enter until they comply.

b. CDC Guidelines for Masking

- i. Who Should Not Wear a Mask? Anyone who is not at risk for any reasons listed below.
- ii. Masks should not be worn by:
 1. Children younger than 2 years old
 2. Anyone who has trouble breathing (This does not mean asthma or other similar conditions; they would need to meet the stipulations in the next section.)
 3. Anyone who is unconscious, incapacitated, or otherwise unable to remove the mask without assistance.
- iii. Feasibility and Adaptations: Masks should not be worn if wearing a mask may:
 1. Exacerbate a physical or mental health condition.
 2. Lead to a medical emergency.
 3. Introduce significant safety concerns.
- iv. Mask Will Create Communication Difficulties
 1. Clear masks should be considered for those who depend on lip reading for communication.
 2. Written communication may also be used.
 3. Use of face shields when more than 6 feet apart.

c. Student & Guests Who Refuse to Wear a Mask.

It is the policy of the school to follow federal, state, and local guidelines regarding masks. If a person entering the school does not have a mask

- i. Students will be offered a mask. (Parent will be charged for the mask)
- ii. If they still refuse, they will be asked to go home until they can/will wear a mask, or the regulation is lifted.
- iii. They may not enter until they comply.
- iv. If the person becomes belligerent: The staff will remain calm and restate the policy. The principal, administrator or teacher may need to step in and provide further explanation. In extreme cases, law enforcement may need to be called.

d. Students Who Claim Exemption for a Medical Condition.

A qualification to enter school is to comply with masking guidelines. If the student has a medical condition that precludes them from wearing a mask:

- i. Students may be asked to wear a mask and the teachers will monitor for distress.
- ii. If the student continues to refuse, they may be sent home until they can mask, or pandemic is over. Virtual Learning may also be offered.

