

# POLICY GUIDE

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Safety Plan For Healthcare Settings In  
School Buildings – COVID-19  
Oct 21  
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[See POLICY ALERT No. 225]

## 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.



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## 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.



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- 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.



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## 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.



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- 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.



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5. Return to Work Criteria
  - a. The school district will include protocols to address return to work criteria for employees in Appendix 11.
  
6. Medical Removal Protection Benefits
  - a. The school district will continue to pay employees who have been removed from the healthcare setting under the medical removal provisions of the ETS. When an employee has been removed from the healthcare setting and is not working remotely or in isolation, the school district shall pay and provide benefits in accordance with the Plan addressed in Appendix 12.
  
- E. Vaccinations
  1. The school district encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. The school district will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.
  2. The school district will include protocols to address vaccination for employees in Appendix 13.
  
- F. Training
  1. The school district will implement policies and procedures for employee training, along with the other provisions required by the ETS, as part of a multi-layered infection control approach.
  2. The school district will include protocols to address training for employees in Appendix 14.



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## G. Anti-Retaliation

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

## H. Requirements Implemented at No Cost to Employees

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

## I. Recordkeeping

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





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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:



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## 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



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## Appendix 2 – Vaccination Status Plan:

[Include and describe the procedures that will be used to determine employees' vaccination status.]



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## Appendix 3 – Completed Hazard Forms and Results:

Please see the attached Hazard Assessment Forms and Results below:



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## Appendix 4 – Patient Screening and Management:

[List the procedures for limiting and monitoring points of entry to the setting, screening and triaging for symptoms of COVID-19, and restricting facility access to reduce crowding (e.g., limiting visitors to only those essential for the patient's physical or emotional well-being and care, restricting visitors to the patient's room or other designated areas, asking patients to remain outside (if possible) until they are called into the facility for their appointment, etc.).]



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

[List the standard and transmission-based infection control precautions.]



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

1. Describe how employees will be provided facemasks and instruction about when and how they should be worn or used.
2. Identify job tasks, if any, in which the use of a facemask presents a hazard of serious injury or death.
3. Describe the procedures for providing employees PPE in accordance with Standard and Transmission-Based Precautions in healthcare settings in accordance with CDC’s “Guidelines for Isolation Precautions.”
4. Describe employer procedures for providing PPE to employees with exposure to people with suspected or confirmed COVID-19.]





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## Appendix 7 – Physical Distancing:

1. Describe how healthcare setting flows, such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel, will be adjusted to ensure physical distancing.
2. Describe physical healthcare setting changes, such as increased distance between workstations, check-in and checkout stations, etc., that will be implemented to ensure physical distancing.
3. Describe how people in the healthcare setting will be prevented from gathering in groups in common areas and “bottlenecks,” including corridors, meeting rooms, stairways, breakrooms, entrances, exits, and elevators.
4. Describe how aisles, tables, counters, check-in and checkout stations, etc. will be arranged and how the flow will be directed to allow for physical distancing between people.
5. Identify protocols such as telehealth, telework, flexible work hours, staggered shifts, or additional shifts that can be used to reduce the number of employees in the healthcare setting at one time.]

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## Appendix 8 – Physical Barriers:

[Describe where and how physical barriers will be installed when physical distancing cannot be consistently maintained and spacing cannot be increased.]



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## Appendix 9 – Cleaning and Disinfecting:

1. Describe the schedule for cleaning and disinfecting, the persons responsible for conducting cleaning and disinfecting, the products that are used to clean and disinfect the healthcare setting, how the school district will clean patient care areas, resident rooms, and medical devices and equipment, and how the school district will clean and disinfect the healthcare setting if a COVID-19 positive person has been in the healthcare setting within the last twenty-four hours. A copy of cleaning logs to be used shall be attached.
  
2. Describe how necessary hand washing and/or sanitizer facilities will be provided, supplied, and maintained; and how employees will be allowed to perform hand hygiene to meet this requirement. Describe how hand washing and/or sanitizer facilities will be provided for use by other persons entering the healthcare setting.]

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## Appendix 10 - Ventilation:

**The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA's COVID-19 ETS.**

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

<u>Name/Contact Information:</u>	<u>Location:</u>
<u>Name/Contact Information:</u>	<u>Location:</u>

[Describe additional measures to improve building ventilation in accordance with "CDC's Ventilation Guidance".]



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

1. Describe how employees will be screened (e.g., in-person when reporting to work, or by asking employees to self-monitor for COVID-19 symptoms before reporting to work). OSHA's *Sample Employee COVID-19 Health Screening Questionnaire* may be useful. If the school district chooses to require COVID-19 testing, it must be done at no cost to employees.
2. Describe how employees will communicate with the school district if they are sick or experiencing symptoms while at home or at work.
3. Describe any leave policies (e.g., sick leave, Family Medical Leave Act, or other policies) the school district will implement to promote employees staying at 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.
4. Describe how you will notify employees of COVID-19 exposure.
5. Describe district procedures for removing employees from the healthcare setting.
6. Describe district procedures for employees returning to work following removal from the healthcare setting.
  - a. The school district will only allow employees who have been removed from the healthcare setting to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC's "Isolation Guidance" and "Return to Work Healthcare Guidance."]

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## Appendix 12 – Medical Removal Protection Benefits:

- [1. Describe district policy for pay and benefits to employees removed from the healthcare setting and not working remotely. Note the following requirements under OSHA’s COVID-19 ETS:
  - 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.]



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## Appendix 13 – Vaccinations:

[Describe district procedures for providing reasonable time and paid leave for vaccinations and side effects.]



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## Appendix 14 – Training:

[Describe how training will be conducted (e.g., online education, department meetings and tool talks, discussion with supervisors, and/or other specific methods).

Describe any other healthcare setting-specific training topics.

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;





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- 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.



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2. The school district will ensure that the training is overseen or conducted by a person knowledgeable in the covered subject matter as it relates to the employee's job duties, and that the training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter as it relates to the employee's job duties.
3. The school district will provide additional training whenever changes occur that affect the employee's risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.]

