

National Heritage Academies

COVID-19 PREPAREDNESS & RESPONSE PLAN

1 PURPOSE AND SCOPE

In order to respond to the current State of Emergency related to the novel Coronavirus (COVID-19) and to comply with relevant state and local orders related to COVID-19, National Heritage Academies (NHA) has prepared the following *COVID-19 Preparedness & Response Plan*. This Plan will be amended/updated as the situation evolves or as state or local orders related to COVID-19 are issued or amended.

This Plan was developed in accordance with (1) The Occupational Safety and Health Administration (OSHA): *Guidance on Preparing Workplaces for COVID-19*, (2) the Centers for Disease Control (CDC): *Interim Guidance for Administrators of US K-12 Schools and Child Care Programs (3/2020)*, and the CDC: *Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes*.

2 DEFINITIONS

Antibody – is a protein found in the blood that is produced in response to foreign substances such as bacteria and/or viruses invading the body. Antibodies protect the body from disease by binding to these organisms and destroying them.

Antigens – are foreign substances such as bacteria and/or viruses in the body capable of causing disease.

Chronic Health Condition – means a health-related state that lasts for a long period of time (e.g. cancer, asthma, diabetes)

Close Contact – Being within 6 feet (2 meters) of a COVID-19 case; close contact can occur while caring for, living with, visiting, or sharing a healthcare waiting area or room with a COVID-19 case or having direct contact with infectious secretions of a COVID-19 case (being coughed on).

Communicable – means a disease that can be transmitted from one person to another. Also known as infectious.

Conditional Release – defines a set of legally enforceable conditions under which a person may be released from more stringent public health movement restrictions, such as quarantine in a secure facility. These conditions may include public health supervision through in-person visits by a health official or designee, telephone, or any electronic or internet-based means of communication as determined by the local health authority. A conditional release may also place limits on travel or require restriction of a person's movement outside their home.

Congregate Settings – means crowded public places where close contact with others may occur, such as shopping centers, theaters, stadiums, etc.

COVID-19 – Coronavirus disease is a respiratory disease caused by the SARs-CoV-2 virus.

Critical Infrastructure Worker – Same as Essential Worker.

Efficacy - is defined as the performance of an intervention under ideal and controlled circumstances.

Effectiveness – refers to its performance under “real-world” conditions.

Essential Worker – Workers necessary to conduct minimum basic operations are “those workers whose in-person presence is strictly necessary to allow the business or operation to maintain the value of inventory and equipment, care for animals, ensure security, process transactions (including payroll and employee benefits, or facilitate the ability of other workers to work remotely.”

Exposure – means contact with infectious agents in a manner that promotes transmission and increases the likelihood of disease.

Face covering/Cloth Masks – masks made of common materials such as tightly woven cotton. A cloth mask or face covering is intended to slow the spread of COVID-19 by protecting others in case the wearer has the virus. Cloth masks ARE NOT Respirators.

Febrile – Having a fever. COVID-19 (temperature greater than 100.4°F).

Herd Immunity – a concept in epidemiology that describes how people can effectively stave off infections if some percentage of the population has immunity to a disease.

HEPA - High Efficiency Particulate Air Filter. A filter designed to remove 99.97% of particulates which are 0.3 microns in diameter.

Immunocompromised – Having a weakened immune system. People who are immunocompromised have a reduced ability to fight infections and other diseases. This may be caused by certain diseases or conditions, such as AIDS, cancer, diabetes, malnutrition, and other certain genetic disorders.

Isolation – means the separation of a person or group of people known or reasonably believed to be infected with a communicable disease and potentially infectious from those who are not infected to prevent the spread of the communicable disease. May be voluntary or compelled by local public health.

Novel Virus – is one that causes human infection but is different from current seasonal human influenza viruses.

Respirator – is an apparatus worn over the mouth and nose or the entire face to prevent the infiltration of dust, smoke, vapors, or other noxious substances. N-95 masks are a type of respirator because it can filter both large and small particles. The name indicates that the mask is designed to block 95% of very small particles.

Self-Observation – means people who must remain alert for subjective fever, cough, or difficulty breathing. If they feel feverish or develop cough or difficulty breathing during the self-observation period, they are required take their own temperature, self-isolate, limit contact with others, and seek advice by telephone from a healthcare provider or their local health department to determine whether medical evaluation is needed.

Self-Monitoring – means people should monitor themselves for fever by taking their temperatures twice a day and remain alert for cough or difficulty breathing. If they feel feverish or develop measured fever, cough, or difficulty breathing during the self-monitoring period, they are required to self-isolate, limit contact with others, and seek advice by telephone from a healthcare provider or their local health department to determine whether medical evaluation is needed.

Self-Monitoring with Supervision – means that the local public health authorities assume the responsibility for oversight of self-monitoring.

Surgical Mask – also called a medical mask, is a loose-fitting disposable mask that protects the wearer’s nose and mouth from contact with droplets, splashes and sprays that may contain germs. A surgical mask also filters out large particles in the air. Surgical masks may protect others by reducing exposure to the saliva and respiratory secretions of the mask wearer.

Virus – is a tiny organism (not alive) that multiplies within cells and causes disease. They are microscopic parasites that lack the capacity to thrive and reproduce outside of a host body.

Quarantine – in general means the separation of persons or group of people reasonably believed to have been exposed to a communicable disease but not yet symptomatic, from others who have not been so exposed, to prevent the possible spread of a communicable disease.

3 CRITICAL INFRASTRUCTURE WORKER DETERMINATION

National Heritage Academies (NHA) have identified Critical Infrastructure Employees. These employees have been informed of such designation in writing. Where required by law or Executive Order, NHA personnel shall carry these letters indicating the assigned task has been deemed essential to operations, and that the school has declared themselves a Critical Infrastructure Business.

Only these employees may be permitted to perform in-person activities so long as any in-person work is performed consistently with the social distancing and mitigation measures required under any relevant Executive Order or public health order.

If a Critical Infrastructure Worker/employee has been exposed or potentially exposed to a suspected or confirmed case of COVID-19, NHA will permit the employee to continue to work, but will implement the following practices:

- Measure temperature of the employee before they enter a NHA facility.
- Require that the employee wear a facecovering for 14 days after exposure.
- Maintain the social distancing requirement(s).
- Routine cleaning of the workplace.

Or: Require that the exposed employee self-isolate for 14 days.

4 PROTECTIVE SAFETY MEASURES

Sick Leave

Employees are permitted to take paid leave consistent with the Families First Coronavirus Response Act and NHA policies. Any onsite employee who appears to have a respiratory illness may be separated from other employees and sent home.

Remote Work

All employees who are not essential to operations, and whose job duties reasonably allow them to telework, will work remotely.

Employee Screening Before Entering the Workplace

A screening questionnaire shall be completed by employees before being permitted to enter a NHA facility (including schools and the Service Center). In addition, if individual schools have implemented on-site temperature taking, no NHA employee shall refuse.

Personal Protective Equipment

NHA provides and makes available to all Critical Infrastructure Employees and employees who have been classified as having a medium risk of exposure, personal protective equipment (PPE). PPE includes, but is not limited to, gloves and a face covering or facial mask. Other PPE required to be worn by NHA employees is included in the *NHA Personal Protective Equipment Hazard Assessment*.

NHA prohibits sharing PPE unless properly cleaned and sanitized. Reusable PPE may be washed and/or sanitized following manufacturer's recommendations when available.

PPE is selected based upon the hazard to the employee.

PPE must be consistently and properly worn when required.

PPE shall be inspected, maintained, and replaced when necessary.

PPE shall be removed properly, cleaned and stored or disposed of, as applicable, to avoid contamination to self, others, or the environment.

5 SAFE WORK PRACTICES AND REQUIREMENTS

Social Distancing

It is recognized that work that is an occupied facility (e.g. School, Service Center) presents an increased risk of virus transmission. Therefore, Supervisors shall direct employees to perform their work in such a

way as to reasonably avoid coming within six feet of other individuals. Where possible, employees may be relocated or provided additional resources to avoid shared use of items such as staplers, etc.

Employees are encouraged to avoid congregating and socializing in conference rooms, team spaces or open areas. Printer usage will be limited to what is necessary. The handles and keypads shall be wiped down with a disinfecting wipe after use (*See Cleaning and Disinfecting*).

No more than one person per vehicle. Employees shall not share rented vehicles (one driver uses the vehicle one day; a different driver uses the vehicle the next day). If a rental car will be used, the Rental Car Company shall be contacted to ensure that the car has been cleaned between customers.

In-person interaction with visitors, vendors, contractors, delivery personnel shall be kept to an absolute minimum and occur only as required for work-related purposes. NHA has provided *Valued Visitors, Suppliers, Contractors, and Service Providers* with a guidance document for working with/within any NHA facility.

When proximity to others is unavoidable, PPE shall be donned. PPE shall include face covering and depending on the task, disposable gloves.

If overnight lodging is necessary, the hotel/motel shall be contacted regarding their rules and regulations.

Enhanced Hygiene

Employees have been/will be instructed to wash their hands with running warm, potable water and soap frequently, to cover their coughs and sneezes with tissue, and to avoid touching their faces. If soap and running water are not immediately available (e.g. playgrounds, travel), alcohol-based sanitizer containing at least 60% alcohol shall be provided.

Signs regarding proper handwashing methods are posted in all restrooms at NHA facilities.

Hand shaking is also prohibited to ensure good hand hygiene.

Tissues, no-touch trash cans and disposable towels will be provided for employees to clean their own work surfaces.

Cleaning and Disinfecting

Employees shall be provided disinfecting wipes so that commonly used surfaces, such as steering wheels, doorknobs, keyboards, office equipment, (staplers, writing utensils, paper cutters, etc.), can be wiped down before use by another person.

NHA limits the sharing of equipment among NHA employees. Should any sharing of equipment be required, employees shall clean and disinfect each piece of equipment following their use, and before any other employee uses the tool or piece of equipment.

A cleaning protocol has been established¹. This cleaning protocol includes:

- Determination of the surfaces which require to be cleaned. Some surfaces only need to be cleaned with soap and water. These surfaces typically include surfaces and objects that are not frequently touched. Soap and water are very effective in destroying the ability for a coronavirus to infect.
- Outdoor areas generally require normal routine cleaning and not disinfection.
- If the school has been unoccupied for 7 days or more, routine cleaning will be performed to reopen the area.
- Disinfection will be performed on hard, non-porous materials such as glass, metal, plastic, etc. The USEPA's list of approved products for use against COVID-19 will be used. Frequently touched items (tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, touch screens), shall be included.
- Soft and porous materials cannot be disinfected in same manner as hard surfaces. The USEPA list of products approved disinfectants for soft, porous materials like carpets, rugs, seating, etc., will be consulted. If the item can be laundered, the directions on the item's label using the warmest appropriate water setting shall be adhered to.
- Cleaning and disinfecting shall be coordinated with contracted cleaning company.
- Under no circumstances shall a RESTRICTED pesticide be used as a disinfectant. Regulated pesticides are permitted if information contained in the label are strictly adhered to.

If Enhanced Cleaning is necessary due to a suspected or confirmed case of COVID-19, the Enhanced Cleaning Protocol shall be followed.

6 CLASSIFICATION OF EMPLOYEE LEVEL OF RISK

Employee risk of occupational exposure to SARS-CoV-2, the virus that causes COVID-19, during an outbreak may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with SARS-CoV-2, or requirement for repeated or extended contact with persons known to be, or suspected of being infected with SARS CoV-2.²

Based on the descriptions of each risk level, there are no NHA employees that have either Very High Exposure Risk or High Exposure Risk. NHA has classified employees as having either Medium Exposure Risk or Lower Exposure Risk (Caution).

¹ CDC: Cleaning and Disinfecting Your Facility. COVID-19.

² OSHA: *Guidance on Preparing Workplaces for COVID-19*: OSHA 3990-03-2020.

Medium Exposure Risk

Medium exposure risk jobs include those that require frequent and/or close contact with (e.g. within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 individuals. In areas without ongoing community transmission, employees in this risk group may have frequent contact with visitors whom have travelled internationally. In areas where there is ongoing community transmission, employees in this category may have contact with the general public in schools such as Office Assistants, Principals, Deans.

Physical barriers such as clear plastic sneeze guards shall be installed where feasible. Other strategies to minimize face-to-face contact shall be considered.

PPE shall be provided.

Lower Exposure Risk (Caution)

Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (e.g. within 6 feet of) the general public. Employees in this category have minimal occupational contact with the public and other coworkers.

Additional engineering controls are not recommended for this risk group. Public health communications about COVID-19 shall be monitored.

7 WORKPLACE CONTROLS

During a COVID-19 outbreak workplace controls shall be implemented.

Engineering Controls

Engineering controls involve isolating employees from work-related hazards. Engineering controls for SARS-CoV-2 include:

- Installing HEPA air filters.
- Increasing ventilation rates.
- Installing physical barriers, such as clear plastic sneeze guards/transaction windows.

Administrative Controls

Administrative controls are those which require action by the employee or NHA as an employer. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard. Administrative controls for SARS-CoV-2 include:

- Encouraging sick employees to stay at home
- Minimizing contact among employees, visitors, vendors, suppliers, parents, etc., by replacing face-to-face meetings with virtual communications.

- Establishing alternating days that reduce the total number of individuals in a NHA facility at any given time, allowing them to maintain distance from one another while maintaining a full onsite work week.
- Discontinuing nonessential travel to locations with ongoing COVID-19 outbreaks. The CDC travel warning levels shall be checked regularly.
- Employee education and training.

8 INDIVIDUALS WITH SUSPECTED OR CONFIRMED COVID-19 CASES

When an individual (employee, students, visitors) with a **Confirmed Case** has entered a school, regardless of community transmission the following is required:

- NHA will coordinate with local health officials. Once learning of a COVID-19 case in someone who has been in the school, the local health department will be notified immediately.
- Students and most staff will be dismissed for 2 – 5 days. This initial short-term dismissal allows time for the local health officials to gain a better understanding of the COVID-19 situation impacting the school. Appropriate next steps as determined by the local health officials will be taken such as an extended dismissal duration to stop or slow further spread of COVID-19.
- During school dismissals, extracurricular group activities, school-based afterschool programs, and large events (assemblies, field trips and sporting events) shall be cancelled.
- Staff, students, and their families will be discouraged from gathering or socializing anywhere. This includes group childcare arrangements, etc.
- Communication with staff, parents, and students will be coordinated with local health officials. Confidentiality of the positive COVID-19 student or staff member will be strictly maintained in accordance with the Americans with Disabilities Act and the Family Education Rights and Privacy Act.
- The area(s) used by the individual(s) with COVID-19 shall be closed off if practical (e.g. 24 hours) before cleaning and disinfecting to minimize potential for exposure to respiratory droplets. Air handling units will remain operational with the maximum amount of outdoor (fresh) supply air provided.
- All areas used by the infected individual(s) (e.g. classroom, office, restroom, cafeteria, etc.) shall be cleaned and disinfected.
- After school dismissal and cleaning and disinfecting, childcare programs and schools may stay open for staff members (unless ill) while students stay home. Keeping the school open: (a) allows teachers to develop and deliver lessons and materials remotely, and (b) allows other staff members to continue to provide services.
- Any re-opening after a confirmed case of COVID-19 shall be coordinated with local health officials.

If an NHA employee believe that he/she qualifies as a Confirmed Case, he or she shall:

- Immediately notify their Supervisor and/or People Services of the diagnosis.
- Remain out of the NHA facility until they are cleared to return to work.

Suspected Case

An individual will be considered to have a Suspected Case of COVID-19 if:

- They are experiencing any of these symptoms: fever, shortness of breath, and/or continuous cough.
- They have been exposed to a COVID-19 positive person, meaning: An immediate family member that has tested positive for or exhibited symptoms of COVID-19; or in the last 14-days, the employee has come into contact with someone who has tested positive for COVID-19.

If an employee believes that he/she has qualified as a Suspected Case, they shall:

- Immediately notify their Supervisor and/or People Services
- Self-quarantine for 14-days, and
- Seek immediate medical care or advice

If an employee qualifies as a Suspected Case, NHA shall:

- Notify all employees who may have come into close contact (being with approximately six feet for a prolonged period of time without PPE) with the employee in the past 14 days (while not disclosing the identity of the employee to ensure the individual's medical privacy), and
- Ensure that the employee's work area, if not outdoors, vehicle, desk (indoors) is thoroughly cleaned.

9 EMPLOYEE EDUCATION AND TRAINING

Employees shall be informed:

- About the sources of exposure to the virus.
- Hazards associated with exposure.
- Requirements of this Plan.
- Proper use of PPE (how to properly don, doff, dispose, disinfect, inspect for damage and maintain).
- Limitation of PPE (especially fabric face coverings).

10 PROGRAM MANAGEMENT

COVID-19 Coordinator

NHA has identified a COVID-19 Coordinator. This Coordinator is responsible for:

- Work with management to cross-train employees to perform essential functions so the workplace can operate even if key employees are absent.
- Identify alternate supply chains for critical goods and services in the event of disruption.
- Develop an emergency communication plan to communicate important messages to employees and clients.

11 RECORDKEEPING

- Injury and Illness Records: OSHA initially required employers (such as NHA) responsible for recording cases of coronavirus only if it is work-related. (April 10, 2020). OSHA has since

clarified this requirement in a memo in which OSHA wrote that “employers need not record instances of infected employees unless the case is confirmed as COVID-19, as defined by CDC and the case is work related.”

- Completed pre-screening questionnaires if used.
- Screening temperature log(s) if used.
- Safety Data Sheets for cleaning products, disinfectant products, efficacy information pertaining to the cleaners/sanitizers.
- Any information obtained from local health officials pertaining to a particular NHA facility.

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