



**Plymouth Scholars Charter Academy**

**COVID-19 Preparedness and Response Plan**

Address of School District: 48484 N Territorial Rd, Plymouth, MI 48170

District Code Number: 82743

Building Code Number(s): 01347

District Contact Person: Sabrina Terenzi

District Contact Person Email Address: [94.sterenzi@nhaschools.com](mailto:94.sterenzi@nhaschools.com)

Local Public Health Department: Wayne County Health Department

Local Public Health Department Contact Person Email Address: [causterb@waynecounty.com](mailto:causterb@waynecounty.com)

Name of Intermediate School District: Wayne RESA

Name of Authorizing Body: Bay Mills Community College

Date of Adoption by Board of Directors: 08/03/2020

## Assurances

- The Academy will cooperate with local public health authorities if a confirmed case of COVID-19 is identified and, in particular will collect the contact information for any close contacts of the affected individual from two days before he or she shows symptoms to the time when he or she was last present at the Academy.
- The Academy acknowledges that it is subject to the rules governing workplace safety established in section 1 of Executive Order 2020-114 or any successor order, and has adopted a Workplace Preparedness Plan. A copy of this plan is attached.
- The Academy will be or is closed to in-person instruction when the region in which it is located in is in Michigan Safe Start Plan Phases 1-3.
- The Academy's sponsored inter-school, after school activities and athletics will be suspended when the region in which it is located in is in Michigan Safe Start Plan Phases 1-3.
- The Academy will comply with guidance from the United States Department of Education, including its Office of Civil Rights and office of Special Education and Rehabilitative Services, and the Michigan Department of Education concerning the delivery of alternative modes of instruction to students with disabilities in light of the impact of COVID-19.
- The Academy will provide for the continued pay of school employees while redeploying staff to provide meaningful work in the context of the Preparedness Plan, subject to any applicable requirements of a collective bargaining agreement if applicable.
- The Academy prohibits indoor assemblies that bring together students from more than one classroom during Michigan Safe Start Plan Phase 4.



President of the Board of Directors

08/03/2020

Date

## **Introduction and Overview**

Plymouth Scholars Charter Academy, located in Plymouth, opened in the fall of 2012 and is managed by National Heritage Academies (NHA). Our school serves grades Y5-8 and had 771 students during the 2019-20 school year. Plymouth's mission is "... to prepare students for success in high school, college, and beyond by providing a rigorous academic environment, setting high expectations for success, implementing research based instructional strategies, and supporting students' individual learning needs". We believe children with a strong moral character and excellent college preparation will excel in any path they choose. We achieve this through our program built on the pillars of moral focus, academic excellence, personal responsibility, and parental partnerships. These values continue to guide our efforts as we work to ensure that our students continue to receive a quality education regardless of the learning environment(s) we may find ourselves in over the course of the 2020-21 school year due to COVID-19.

In Spring 2020, when Governor Gretchen Whitmer first announced a state-wide closure from March 16 through April 5, the implementation of our remote learning plan began immediately. In the initial days of this transition, we focused on helping students, families, and staff adjust mentally and physically to a new learning model. Teachers and other staff connected with students via telephone and email to provide learning options using printed materials the students had brought home. Schoolwork was based on reading material and lessons that had recently been completed, using reinforcements and extensions. We continued to improve our remote programming, rolling out Remote Learning 2.0 in early April. Remote Learning Packets were created and mailed to all students with an amended scope and sequence and we used Google Classroom to connect with students and complete assignments virtually.

At the close of the 2019-20 school year, the school elicited feedback from parents throughout the period of remote learning. This was sent to teachers and compiled by the administrative team in order to address current areas of need in addition to plan for future remote learning periods. Additionally, parent-led groups were also utilized to elicit feedback regarding remote learning and areas of need from within the parent body. This feedback was used to improve and inform continued remote instruction programming.

As fall approaches, Plymouth Scholars Charter Academy, in partnership with NHA, is preparing for four possible learning environments that may be necessary throughout the 2020-2021 school year. We have created detailed plans around each learning scenario which include:

- In-person: a return to traditional classroom environment
- Remote: teaching and learning done completely at home
- Hybrid: a combination of in-person and remote instruction
- Virtual: teaching and learning in a fully online environment

Each of these options are aligned with the MI Safe Schools Return to School Roadmap, which outlines required and recommended safety protocols for the 2020-21 school year based on the status of coronavirus in our community. The wellbeing of our students and staff remains our number one priority. We have developed the following plan to ensure safety, quality education, and a seamless transition throughout any changes to our learning environment.

## **Plan for Operating during Phases 1, 2 or 3 of the Michigan Safe Start Plan**

### **Phase 1, 2, or 3 Safety Protocols**

Under Phase 1, 2, or 3 of the Michigan Safe Start Plan, the school will be closed and no in-person instruction will be allowed. Our school will operate 100% in a remote instruction learning environment. All after-school and extra-curricular activities are suspended under these phases. The building will be closed, deep cleaned/sanitized and then maintained with routine janitorial services as needed based on building usage. The school will still be accessible by school employees and contractors as necessary for basic school operations. Social distancing and mask use will be required while present in the building. In addition, any staff entering the building will need to complete a health screening.

In the event that our ISD asks to use our school building for a disaster-relief child-care center, we will connect with the school's management partner, National Heritage Academies, to cooperate in providing our building for such use and such length of time as is needed.

### *Food Service*


This spring when the school closed due to the COVID-19 pandemic, the school recognized that some students would face hunger issues without the breakfast and lunch the school provided. With this reality in mind, NHA decided early on in this process to do everything it could to continue providing these meals to students who require them. Necessary state approvals to continue providing meals were secured and plans/schedules were developed describing how our food service vendor would provide these meals. If a return to Phase 1, 2, or 3 occurs, or a return to remote learning is necessary at any time, the school will again ensure that meals will continue to be provided to families in need via our vendor, Preferred Meals, when necessary and/or providing information about available local resources. The school will ensure that any food distribution done at the school is done safely and meets local and state guidelines.

### *Transportation*

When in Phase 1-3, all busing operations are suspended.

### **Phase 1, 2, or 3 Mental & Social-Emotional Health**

Trauma occurs when there is an overwhelming event or events that render a person helpless, powerless, or creates a threat of harm or loss to that person, or to someone critically important to the person. Traumatic experiences like COVID-19 can impact learning, behavior, and relationships at school. Research clearly indicates that a traumatic experience in childhood can diminish concentration, memory, and the development of language that children need to be successful at school. The COVID-19 pandemic is affecting not just our children's physical health and academic experience, but it is taking a deep emotional toll as well. We believe children's well-being comes first, and that young people like adults, learn best when they are happy, safe, calm, and cared for properly.



As educators, we need to do everything in our arsenal to reduce the effects of trauma so that students can learn at an optimal level. Trauma does not discriminate between urban and suburban students as people will perceive threats like COVID-19 in their own way. It is imperative that our organization continues to nurture the hearts and minds of our children and staff and show a thoughtful, innovative response from schools and networks as we strive to support students' mental health.

We will continue to provide families with the support they need for a successful remote learning experience. We have worked and will continue to work to provide parent resources such as “How to Help Your Child Understand COVID-19”, “Help your Child Cope with Stress and Anxiety”, “Activities for Children and Families to Maintain Normalcy in Schedule”, and “The Grief Experience through COVID-19”. We have also provided parents with additional resources such as [healthychildren.org](http://healthychildren.org) and SAMHSA Disaster Distress Helpline.

The school will establish and communicate to all staff guidelines for the identification and rapid referral of at-risk students to appropriate building-level support teams. There is an established Intervention Assistance Team process in place to address the social/emotional and academic needs of students. Additionally, regular one-on-one meetings between teachers and their managers allow for processing concerns related to students and the need for more immediate intervention. This will continue in a remote learning environment.

If students are not participating in remote learning and teachers are unable to connect with them, the teacher will share the information with their Dean. When necessary, the Dean will bring the name to the Principal, which will trigger a response from the social and emotional support team, who will continue attempts through a variety of communication methods.

Professional development for staff regarding social-emotional learning & trauma-informed best practices was delivered at the 2020 NHA Leadership Summit over the summer. Throughout the year, ongoing support will be offered through newsletters with specific activities that can be conducted with both staff and students to address their social and emotional needs. Monthly town hall meetings will also be conducted to establish a community for sharing best practices and resources to address the social and emotional needs of staff and students.

The Deans at Plymouth Scholars work closely with the grade-level staff that they oversee to serve students and families. If a staff member brings a concern about a student or family to the Dean administration, the appropriate Dean will take the lead in establishing contact with the family to ensure they receive the support and information they need. This includes providing the necessary materials to help the family navigate Covid-19 needs as well as any remote learning.

The school is also concerned with the mental & social-emotional health of our staff. Leaders consistently hold one-on-one meetings with staff that will allow for evaluating physical and mental health status. We also have an ethics hotline where employees can report concerns. Additionally, we provide, free of charge, access to an employee assistance program where staff can access a library of resources for self-care as well as are provided with complimentary counseling sessions.

At this time the school is not implementing a mental health screening for all students by a trained professional. We will conduct additional research into an appropriate assessment tool that can be used. Additionally, it will be necessary for school staff to be properly trained to ensure appropriate implementation and next steps.

## Phase 1, 2, or 3 Instruction

### *Governance*

NHA leaders have been addressing the unfolding situation using a comprehensive pandemic plan created several years ago as part of our broader emergency plan. This proprietary pandemic plan focuses on three priorities that directly reflect the U.S. government's published Pandemic Response Phases: *preparation, response, and recovery*. In each of these three phases, NHA's plan maintains an overarching focus on safety while pursuing five more specific goals:

- 1) Limit illness, the spread of illness, and emotional trauma.
- 2) Preserve continuity of essential functions.
- 3) Minimize social and educational disruption.
- 4) Minimize instructional loss.
- 5) Maintain appropriate communications with government health departments and the U.S. Centers for Disease Control & Prevention (CDC).


Under this plan, a cross-functional team of about a dozen NHA leaders and professionals oversees management of NHA's response to the pandemic. This team has three areas of focus:

- ❖ Planning and development in key areas such as safety and health, school quality, health care, people services, facilities, and strategic communications.
- ❖ Managing immediate needs in any outbreak, addressing not only priority areas mentioned above but also food service, purchasing, and the Service Center's one-stop business support for schools.
- ❖ Facilitating NHA's eventual return to normal operations.

We began reviewing and implementing this plan in February as global concerns about the COVID-19 virus were growing. In March, by the time schools were closing, NHA had begun a comprehensive, systematic response led by our CEO, Brian Britton.

For example, at multiple meetings that were being conducted seven days a week in late March, NHA leaders and professionals were sharing information, discussing challenges, and refining strategies and tactics. Functions represented in these meetings typically include safety and health, school quality, health care, people services, facilities, strategic communications, food service, purchasing, and the Service Center's one-stop business support for schools. All of these efforts focus on action: developing and implementing specific steps to ease the impact of the crisis.

The school, in partnership with NHA, began immediately implementing a remote learning program intended to offer all families and students robust, rigorous, and standards-based content in a format that was simple and easy



to implement remotely. This remote learning plan was shared with all involved stakeholders. Together, NHA and the school continued to work to improve this programming throughout the spring school closure.

At the close of the 2019-20 school year, the school elicited feedback from parents throughout the period of remote learning. This feedback was used to improve and inform future remote instruction programming and was also used by the NHA cross-functional pandemic team to inform decisions for the upcoming school year.

As we embark on an uncertain new school year, the school will remain flexible and adapt as needed to the changing needs of its students, staff, and community. Feedback will continually be gathered to help improve efforts to ensure all needs are addressed.

### *Remote Instruction*

After much research and new learning, the Academy in Partnership with NHA has prioritized five key components for remote learning:

- 1) Ensuring Regular Teacher/Student Connections
  - The school recognizes, that even in a remote setting, teachers play the most important role in growing our students.
- 2) Provide Opportunities for Student Discourse
  - We know that students learn more when they are the ones doing the thinking and speaking.
- 3) Allow for Flexibility in Scheduling
  - Every region and school may need to operate slightly differently.
  - Schools may need to adjust plans as needs change in their community.
- 4) Encourage Engagement and Participation
  - Students learn best when actively engaged.
  - The types of learning opportunities we provide and the technology tools that we choose help ensure active engagement and participation.
- 5) Utilizing Rigorous Instructional Materials
  - NHA has spent three years rolling out high quality resources that others have vetted and shared are the best resources we can be using. These resources will continue to be utilized even in a remote learning setting.

As we work to transition our instructional vision to a remote model and develop a plan for remote learning, we prioritize three learning types for our students.

- Synchronous Small Groups
  - By prioritizing small group instruction, we can ensure that teachers and students are able to connect regularly. We are allowing opportunities for student discourse, engagement, and


participation. Our same high-quality resources are being utilized within our synchronous small groups.

- Scheduling
  - Math Small Groups will meet two times per week (e.g., on Mondays and Wednesdays)
  - ELA Small Groups will meet two times per week (e.g., on Tuesdays and Thursdays)
  - Science & Science Studies Groups will vary by week
- Asynchronous Learning
  - Pre-recorded Lessons
  - Independent Practices
- Office Hours
  - Office hours are another opportunity for teacher-student connections. Teachers can provide feedback, offer assistance or support with an assignment, and/or address remediation/extension opportunities.
  - Office hours also provide an opportunity for a parent touchpoint.

Below is an example of what a weekly schedule would look like in this environment.

Sample Teacher Week at a Glance					
3 <sup>rd</sup> Grade ELA: Unit 1 Week 1					
	Day 1	Day 2	Day 3	Day 4	Day 5
<b>Synchronous Small Group</b>		<b>Shared Reading:</b> Unit 1 Day 2 "MVP" by Clare Mischica		<b>Shared Reading:</b> Unit 1 Day 3 "A Sudden Slice of Summer"	<b>ELA Small Group Intervention</b>
<b>Read Aloud [Video]</b>	Unit 1 Day 1 <i>Thunder Cake</i> by Patricia Polacco	Unit 1 Day 2 <i>An A from Miss Keller</i> by Patricia Polacco	Unit 1 Day 4 <i>An A from Miss Keller</i> by Patricia Polacco		
<b>Shared Reading</b>	Unit 1 Day 1 "MVP" by Clare Mischica		Unit 1 Day 3 "A Sudden Slice of Summer"		Weekly Quiz: Unit 1 Week 1
<b>Independent Reading</b>	Recommendation: Read for 15 minutes daily and complete Reading Log				
<b>Writing</b>	Persuasive Essay: Persuade your parents to let you travel to another country.				
<b>Digital Tool</b>	Recommendation: 30-60 minutes a week				
<b>Office Hours</b>	Recommendation: 2 hours per week				





For all content areas, including Moral Focus, the school has examples to instruct teachers on how to translate in-person learning to the remote format. For Math and ELA, a weekly schedule like the above will be provided for every week of the year. That way should the school go remote in the middle of a unit, teachers will be able to find the plan for where they left off in-person and be able to pick right up in a remote environment.

If the school ends up needing to start the year remotely, students will still be assessed to understand where they are academically and to inform instructional decisions for teachers, students, and families.

Students with IEPs or 504s will access the same learning opportunities that are offered to general education students. These learning activities and supports will address student needs identified within any IEP/504, to the extent appropriate. To accomplish this, special education providers will collaborate with general education teachers to ensure provision of accommodations and modifications (when appropriate) that allow students to access learning opportunities. Individualized accommodations have been documented for each student and have been shared with classroom teachers. A grade level specific list of accommodations has been created for teachers to share with families.

EL teachers are working with classroom teachers to provide necessary scaffolds to schoolwork to ensure EL students are able to access the core content. Interventionists will take direction from their leadership team on how to best collaborate and support general education teachers so that all instructional professionals are able to support each student and family as needed.

Deans will oversee their grade bands and will meet regularly with teachers to conduct checkpoints around curriculum and instruction, monitoring student progress, and identifying students in need of additional support.

The school will develop a continuation of services plan for any students needing occupational, physical, and/or speech and language therapy, including evaluations by school psychologists and social workers. A FAPE will be delivered to all students that have an IEP or Section 504 plan. Careful consideration will be given as to the best way to deliver these services in a socially distant and safe way.

### *Communications & Family Supports*

The school will ensure that it is effectively and efficiently communicating with its families, ensuring that every family is aware of the expectations for students. Information is provided to families via the school's SchoolMessenger system which sends an email and text to every family. Information will also be provided in school newsletters, back to school information, social media sites, and the school's website appropriate. The school will ensure parents are provided with resources, strategies, and training to support their students' learning. All official school communication is translated into students' home languages as needed.

### *Professional Learning*

All instructional staff members will have, at minimum, monthly PLC meetings to identify and capitalize on best practices for remote instruction. The school's LTS or technology coordinator will support staff with enhancements for use within Google Classrooms on a monthly (minimum) basis. All staff members have been

trained in using Google Meet. PLC meetings will continue either in-person or virtually on a monthly (minimum) basis.

### *Monitoring*

In a remote environment the Academy will monitor the following:

- Connectivity and Access
  - NHA is providing each scholar with a laptop. This removes the barrier of students lacking access to devices. Additionally, parents that have limited connectivity have been connected with community resources to establish connectivity.
- Attendance
  - Instructors will continue to track student participation. Our online Gradebook system allows for monitoring of participation virtually. Students will be considered present when one (or more) of the following situations takes place:
    - The student “checks in” or attends a Google Classroom event.
    - The student completes and submits a Google Classroom assignment.
    - The student completes and submits a learning packet assignment.
    - The student “checks in” with the teacher via phone if not able to complete work virtually.
- Student Work
  - Teachers are actively giving feedback throughout the day via Google Classroom. The work is submitted in Google Classroom via Google Forms.
  - Interventionists are calling students who are struggling and offering online tutoring sessions.
  - Teachers will provide feedback to students weekly as feedback for students and parents.

## **Phase 1, 2, or 3 Operations**

### *Facilities*

The building will be closed, deep cleaned/sanitized and then maintained with routine janitorial services as needed based on building usage. Janitorial staff will wear the required PPE as necessary. The school will still be accessible by school employees and contractors as necessary for basic school operations. Social distancing and mask use will be required while present in the building. In addition, any staff entering the building will need to complete a health screening.

The school does not coordinate with Local Emergency Management Programs (LEMP) to procure its cleaning and disinfection supplies as this is provided by our janitorial services partner, Aramark.

### *Technology*

A family survey regarding reliable and effective Internet and device access was completed prior to the beginning of the 2020-21 school year. During the 2020-21 school year, NHA will be providing each student with a laptop. It is our hope that this helps eliminate barriers such as lack of devices. Students will utilize Google Classroom to receive & submit assignments, receive feedback, and connect. The school will review and update its data privacy and technology policies as necessary.

Our LTS will be the school's technology support lead. Families will have the contact telephone number and email for the LTS. Additionally, NHA will support each individual school with a 1-800 hotline number for additional technology support. To safely manage device repairs/replacements during period of remote instructions, each LTS or TTC has received training on the safe handling of returned materials, has cleaning/disinfection supplies provided by NHA/Aramark, and has procedures to follow for the packaging of devices for replacement. In addition, the classroom teachers and deans will support families who need technology support. They will connect with the families to ensure students can access the materials and have appropriate logins and passwords.

### *Budget, Food Service, Enrollment, and Staffing*

If a return to Phase 1, 2, or 3 occurs, or a return to remote learning is necessary at any time, the school will again ensure that meals will continue to families in need via our vendor, Preferred Meals, when necessary and/or providing information about available local resources. The school will ensure that any food distribution done at the school is done safely and meets local and state guidelines.


Based on instructional programming, the school will provide instructional resources and materials to staff and students as feasible.

The school will utilize online platforms to continue to recruit, interview, and hire as necessary.

Our online Gradebook system allows for monitoring of participation virtually. Students will be considered present when one (or more) of the following situations takes place:

- The student “checks in” or attends a Google Classroom event.
- The student completes and submits a Google Classroom assignment.
- The student completes and submits a learning packet assignment.
- The student “checks in” with the teacher via phone if not able to complete work virtually.

The table below shows suggested time-on-task for various academic subjects by day. Please note that these times are flexible and may be adjusted, as needed. Teachers will continue to reinforce this flexibility during their weekly communication with families.



<b>Content Area</b>	<b>Time-On-Task</b>
<b>ELA</b>	75 minutes
<b>Math</b>	60 minutes
<b>Science/SS</b>	30-90 minutes
<b>Moral Focus</b>	15 minutes
<b>Specials</b>	30 minutes

During times of remote instruction, all instructional staff will provide daily activities/assignments. Teachers will develop Google Meetings to support student understanding and mastery of the daily lessons and will maintain “office hours” multiple times throughout the week in addition to the Google Meeting times. The Google Meetings can be one-on-one with students, with a small group, or the whole class as needed. It is the expectation that the teacher provides materials for each student daily, but may not have daily direct interaction.

## Plan for Operating during Phase 4 of the Michigan Safe Start Plan

### **Phase 4 Safety Protocols**

Under Phase 4 of the Michigan Safe Start Plan our school will operate either in a remote, hybrid or in-person instruction learning environment with strict health and safety guidelines. A hybrid learning environment will be used if partial-closure of campus is deemed necessary due to communicable disease outbreaks, health department or Governor executive orders, or administrative decision based on safety and health interests of our students, staff, and community. While not required in Phase 4, remote learning may be necessary due to local conditions.

### *Personal Protective Equipment*

The school will follow state and local guidelines for mask/face covering use. Masks/face coverings can be homemade or disposable level-one surgical masks. Under Phase 4, masks will need to be worn by students in grades 6-8 throughout the day unless an underlying health condition or sensory issue exempts them. K-5 students will remain with their homeroom students as much as possible. K-5 students will be strongly encouraged to wear a mask daily. If there are students that are unable to obtain a mask, additional masks will be made available in the school's main office as needed. Masks will need to be worn by all students whenever they are outside of their classroom for reasons such as transitioning and arrival/dismissal, and when social distancing is not able to be maintained. Students with significant disabilities preventing the use of facial coverings are referred to forthcoming guidance from MDE.

Masks/face coverings will also be mandatory for staff unless they are approved to not wear them. This determination will be made on a case-by-case basis in partnership with NHA's HR department. If a staff member refuses to comply with the mask requirement, we will use our standard disciplinary process for policy violations. This may include coaching, conversations, verbal warnings, written warnings, final written warning, and termination. In situations where a student is refusing to wear a mask, we will begin with education on the importance of wearing a mask in keeping our school community safe. In the event there is continued non-compliance with wearing a mask, the school will reach out to the parent/guardian for support.

200 reusable masks have been provided to the school for staff use. Students that are in need of a mask will be provided one through the school's main office, as needed. Staff and students will be required to wash cloth facial coverings or dispose of disposable masks daily. We will revisit the need to require staff and students to wear masks based on CDC, state, and local health department guidelines.

### *Hygiene & Cleaning*

Several significant changes are being made with our janitorial service partner, Aramark, such as increasing manpower, changes in management structure, improved training, greater accountability, and monthly audits. In addition to our baseline janitorial services, Aramark is also providing additional cleaning services due to COVID-19. These include:


- Increased frequency of high touch point disinfection

- All high touch point locations such as light switches, door handles, bathroom faucet handles, etc. will be disinfected three times a day (mid-morning, mid-afternoon, and evening)
- All cleaning materials are EPA approved for use against COVID-19.
- Playground structures will continue to be cleaned as necessary with EPA approved disinfectant.
- Supplying the school with necessary materials
  - Aramark is ensuring that each classroom within the school has hand sanitizer, a spray bottle of Virex Disinfectant Cleaner, paper towel, and instructions on how to properly use the provided materials for times when additional cleaning/disinfecting may be needed in individual classrooms. Staff must wear gloves, surgical mask, and face shields when performing all cleaning activities.
  - Aramark is also ensuring that plenty of hand soap is in stock at the school to stay ahead of any shortage. Soap, hand sanitizer, and Virex will be refilled as necessary.
- Retraining of existing janitorial staff
  - All janitorial staff are being retrained on cleaning and disinfecting specifically for COVID-19.
- Facilities Preparedness and Response Plan
  - An action plan has been created for employment if there is a suspected or confirmed case of COVID-19 in the school building. This plan includes thorough disinfection and cleaning, which may require a temporary closure of the school building.
- Safe and correct storage of cleaning and disinfection products

In addition to the added efforts of our janitorial services, we are all joining in the effort to promote safe hygiene habits. Handwashing posters instructing and reinforcing proper handwashing techniques will be placed in bathrooms. Handwashing breaks for students and staff will be scheduled every 2-3 hours. Effective handwashing techniques will be taught and reinforced by school staff at the start of the year and throughout the year, including washing with soap and water for at least 20 seconds and the safe use of hand sanitizer. Scheduled restroom breaks for each classroom will occur two times per day. Plymouth Scholars will also provide hand sanitizer in all classrooms and office areas. The hand sanitizer will be at least 60% alcohol.

Social distancing reminder signs and one-way traffic floor markings (where possible) will be placed throughout the school building. Social distancing floor/seating markings will be established in waiting/reception areas.

When possible, teachers will rotate in and out of classrooms rather than having students transition. This should help eliminate the need to have student desks be wiped down after every class period. However, if student movement does take place, the teacher will be responsible for ensuring that every desk has been disinfected before a new group of students enters the classroom. Whenever possible, Specials teachers will rotate in and out of the classrooms as well. However, when necessary to use their own classroom/space, all hands-on classrooms will be



disinfected between student groups. Students should not be sharing personal materials such as pens, pencils, etc. Each classroom will have materials to disinfect commonly shared items such as computers and curricular tools.

K-5 students will be provided with individual cubbies. They will keep their items in a labeled container within the cubby as well as on the cubby hook. No classroom supplies will be shared. Students will also keep personal items for learning in their desks. In addition, students will transition five students at a time to their cubby, with only one student per five cubbies. This effort will be made to maintain recommended social distancing guidelines.

Students in grades 6-8 students will be provided with individual lockers. Lockers will be assigned alternating by grade level so that a 6th grader has a locker in between 7th and 8th grade students. Classroom transitions will happen by grade level, thus allowing for only one student every three lockers during transition time. This effort will be made to maintain recommended social distancing guidelines.

### *Spacing, Movement, and Access*

Under Phase 4, the movement of students will be limited as much as possible. K-5 students will remain with their homeroom cohort as much as possible. Specials will take place inside classrooms whenever possible. Middle school students will utilize staggered rotations when transitions are necessary. No more than two grade levels will use the playground for recess at a time. Restroom breaks will be limited to one classroom at a time. Large gatherings such as assemblies are prohibited in Phase 4.

Handwashing posters instructing and reinforcing proper handwashing techniques will be placed in every bathroom. Social distancing reminder signs and one-way traffic floor markings (when applicable) will be placed throughout the school building.

In addition, teachers will maintain six feet of spacing between themselves and students as much as possible. The school will limit additional people entering our building as much as possible. Family members of students will be asked to not enter the building unless absolutely necessary. Visitors will be by appointment only and at the discretion of the front office and principal. Any necessary guests will be screened for symptoms, be required to wear a mask, and sanitize their hands upon entrance. A log will be kept of all visitors entering and exiting the building.

The school will, when feasible, space desks six feet apart in classrooms. When six is not possible, the desks will be spaced as close as possible to six feet apart. In classrooms where large tables are utilized, students will be spaced as far apart as possible. In Young 5s, kindergarten, and middle school Science classrooms, students will work at large tables that will be spaced as close to six feet apart when possible with no more than three-four students at a table.

If necessary, to meet social distancing guidelines and based on the local containment of the virus and school leadership discretion, the school is prepared to operate in a hybrid model/staggered schedule. More information about this learning environment option is available under the [Phase 4: Instruction](#) section.

### *Screening Students and Staff*

The school will cooperate with the local public health department regarding the implementation of screening and testing of students and staff. When and where necessary, we are prepared to do a temperature scan of students as they arrive at the building. This will be conducted by trained staff who have appropriate PPE including gloves, disposable face masks, and face shields. Temperatures will be taken outside before students enter the building.

Student arrival will occur from 7:50-8:10 a.m. each morning. Y5, kindergarten, and middle school students will enter through the southwest doors of the building. First through 5th grade students will enter through the southeast doors of the building.

Our school has identified a specific isolation location for students who are sick or run a fever of 100.4 or greater until they can be picked up. When in use, the student and staff member supervising will be required to wear masks.

Staff members are required to complete daily wellness checks before arriving at work to ensure they do not exhibit COVID-19 symptoms (fever, cough, shortness of breath, or difficulty breathing). To assist with this a daily health-screening app was created by our management partner, National Heritage Academies. Staff members can use their mobile device to scan a QR code and complete the required screening survey.

### *Testing Protocols for Students and Staff and Responding to Positive Cases*

We will monitor and follow local health department and state recommendations. If an employee or student is showing COVID-19 symptoms, they will be sent directly home, or to an identified isolation room until they can be safely picked up. When the isolation room is in use, the student and staff member supervising will be required to wear masks.

The school leadership will notify our NHA People Services Business Partner who will help determine appropriate action based on the situation. The People Services Business Partner will communicate to the NHA Facilities team to ensure proper cleaning is done. The People Services Business Partner will also partner with the communications team to ensure the proper stakeholders are notified in a timely manner, while also ensuring compliance with employee and student confidentiality and HIPAA requirements.

### *Responding to Positive Tests Among Staff and Students*

If there is a confirmed case in which reporting is necessary, the People Services Business Partner for the school will report the case to the local department of health. The People Services Business Partner will communicate to the NHA Facilities team to ensure proper cleaning is done and will also partner with the communications team to ensure the proper stakeholders are notified in a timely manner, while also ensuring compliance with employee and student confidentiality and HIPAA requirements. Staff and students with suspected or confirmed cases of COVID-19 can return to school when they have received a negative COVID-19 test, it's been 10 days since the individual first had symptoms, or it has been at least three days since the individual had a fever or symptoms have improved (when they have been released from isolation per the CDC guidelines).



The school will support the contact tracing initiated by the health department by providing the contact information for any close contacts of the affected individual from two days before he or she showed symptoms to the time when he or she was last present at the school.

Upon cases of suspected or confirmed COVID-19 cases in the building, the Facilities Preparedness and Response Plan calls for a move into a Level 3 Response Procedure. Within 0-24 hours of the last known presence of a suspected/confirmed case in the facility all known areas accessed by the case will be closed and vacated. Partial or full building closure will be done as deemed necessary by the school leadership and their DSQ. Aramark personnel will prepare for full disinfection cleaning after 24 hours has passed. Aramark personnel will utilize enhanced PPE (gloves, face masks, gowns) during their disinfection cleaning. Re-entry will not be permitted until disinfection cleaning will be complete. The duration of disinfection cleaning will depend on the extent of areas visited in the facility by the suspected/confirmed case.

### *Food Service*

YK-8<sup>th</sup> grade students will eat lunch in their classrooms.

### *Athletics & Extra-curriculars*

Small group programming will be allowable, but safety precautions must be taken to ensure students and staff are safe. Programming can take place where social distancing is possible. Students and staff will be expected to wear face coverings when physical distancing is not possible. Students, teachers, and staff must use proper hand hygiene techniques before and after every practice, event, or other gathering. Any equipment must be disinfected before and after every use. School leaders will communicate with families the status of after school clubs and extracurricular activities to parents in a timely fashion. The school will follow as necessary all local and state guidelines, including the Michigan High School Athletic Association guidance.

The school will follow all required guidelines from the state including:

- ❖ Inter-school competitions may be held provided that, facial coverings are worn if school transportation is provided. Buses must be cleaned and disinfected before and after every use, as detailed in the subsequent "Busing and Student Transportation" section.
- ❖ Spectators are allowed provided that facial coverings are used by observers and six feet of social distancing can be maintained at all times. Attention must be given to entry and exit points to prevent crowding.
- ❖ Each participant must use a clearly marked water bottle for individual use. There should be no sharing of this equipment.
- ❖ Handshakes, fist bumps, and other unnecessary contact must not occur.
- ❖ Indoor weight rooms and physical conditioning activities that require shared equipment are suspended. Outdoor physical conditioning activities are allowed while maintaining social distancing.
- ❖ Large scale indoor spectator events are suspended. Large scale outdoor spectator or stadium events are limited to 100 people, and people not part of the same household must maintain six feet of distance from one another.

## *Transportation*

Our school does not provide busing transportation to and from school. Under Phase 4 field trip busing is suspended. If student transportation becomes necessary, the school will follow all state and local requirements.

## *Medically Vulnerable Students & Staff*

All current plans for accommodating students with special healthcare needs (e.g. Individual Healthcare Plans, Individualized Education Programs, Individualized Family Service Plans, or 504 plans) will be reviewed and updated as necessary to decrease their risk for exposure to COVID-19.

Staff who self-identify as high risk will be directed to the People Services department. The People Services department will review possible alternative work opportunities depending on the structure of the school. If an alternative work assignment is not feasible, staff will be offered a leave of absence. The school is exploring the possibility of a completely virtual learning opportunity. Such an opportunity may be able to be utilized for students who self-identify as high risk.


## **Phase 4 Mental & Social-Emotional Health**

Trauma occurs when there is an overwhelming event or events that render a person helpless, powerless, or creates a threat of harm or loss to that person, or to someone critically important to the person. Traumatic experiences like COVID-19 can impact learning, behavior, and relationships at school. Research clearly indicates that a traumatic experience in childhood can diminish concentration, memory, and the development of language that children need to be successful at school. The COVID-19 pandemic is affecting not just our children's physical health and academic experience, but it is taking a deep emotional toll as well. We believe children's well-being comes first, and that young people like adults, learn best when they are happy, safe, calm, and cared for properly

As educators, we need to do everything in our arsenal to reduce the effects of trauma so that students can learn at an optimal level. Trauma does not discriminate between urban and suburban students as people will perceive threats like COVID-19 in their own way. It is imperative that our organization continues to nurture the hearts and minds of our children and staff and show a thoughtful, innovative response from schools and networks as we strive to support students' mental health.

One of the biggest things we can do is partner with our parents in this return to school transition to destigmatize COVID-19, understand normal behavioral responses to crises, share best practices of taking through trauma with children, and provide self-care opportunities. We have worked and will continue to work to provide parent resources such as "How to Help Your Child Understand COVID-19", "Help your Child Cope with Stress and Anxiety", "Activities for Children and Families to Maintain Normalcy in Schedule", and "The Grief Experience through COVID-19". We have also provided parents with additional resources such as [healthychildren.org](https://www.healthychildren.org) and SAMHSA Disaster Distress Helpline.

The school will establish and communicate to all staff guidelines for the identification and rapid referral of at-risk students to appropriate building-level support teams. There is an established Intervention Assistance Team process in place to address the social/emotional and academic needs of students. Additionally, regular one-on-one



meetings between teachers and their managers allow for processing concerns related to students and the need for more immediate intervention. This will all still continue regardless of the learning model.

Professional development for staff regarding social-emotional learning & trauma-informed best practices was delivered at the 2020 NHA Leadership Summit over the summer. Throughout the year ongoing support will be offered through newsletters with specific activities that will be conducted with both staff and students to address their social and emotional needs.

The school is also concerned with the mental & social-emotional health of our staff. Leaders consistently hold one-on-one meetings with staff that will allow for evaluating physical and mental health status. We also have an ethics hotline where employees can report concerns. Additionally, we provide, free of charge, access to an employee assistance program where staff can access a library of resources for self-care as well as are provided with complimentary counseling sessions.

At this time the school is not implementing a mental health screening for all students by a trained professional. We will conduct additional research into an appropriate assessment tool that can be used. Additionally, it will be necessary that school staff are properly trained to ensure appropriate implementation and next steps.

## **Phase 4 Instruction**

### *Governance*

At the close of the 2019-20 school year, the school elicited feedback from parents throughout the period of remote learning. Feedback was gathered by the school in order to address current areas of need in addition to planning for future remote learning periods. This feedback was also used by the NHA cross-functional pandemic team to inform decisions for the upcoming school year.


As we embark on an uncertain new school year, the school will remain flexible and adapt as necessary to the changing needs of its students, staff, and community. Feedback will continually be gathered to help improve efforts to ensure all needs are addressed.

### *Instruction*

The school, in partnership with its management company, National Heritage Academies (NHA), is preparing for four possible learning environments that may be necessary throughout the 2020-2021 school year. We have created detailed plans around each learning scenario which include:

- In-person: a return to a traditional classroom environment.
- Remote: teaching and learning completed at home.
- Hybrid: a combination of in-person and remote instruction.
- Virtual: teaching and learning in a fully online environment.

It is our commitment that students will receive a quality education regardless of the learning environment(s) we find ourselves in throughout the school year. In anticipation of possible interruptions to in-person instruction,



National Heritage Academies is providing a laptop to each scholar. This investment in technology is being made to ensure a seamless transition between models, as necessary.

### Traditional In-person Instruction

We believe that the best learning environment for our students includes regular, day-to-day, in-school instruction provided by a teacher. Therefore, our goal is to have a traditional, in-school learning environment for our students as long as this can be accomplished while keeping students and staff safe and healthy. However, local conditions with COVID-19, safety and social distancing requirements, and/or the operational model of local districts may require a shift to a hybrid or a remote learning model.

### Remote Learning

While remote learning is not required under Phase 4, factors such as COVID-19 cases present in the school community or surrounding area may require us to step back into a remote learning environment. See [Phase 1-3: Instruction](#) for more detailed information regarding our remote learning model.

### Hybrid Environment

While in-person instruction is our strong preference, we recognize that there will likely be times throughout the year when this will not be possible. However, rather than operating under a fully remote model, we may have the opportunity to operate under a combination of remote and in-person environments, with students attending in person some days and participating in remote learning on others.

The decision to move to a hybrid learning environment will be based on several factors, including but not limited to the amount of COVID-19 cases present in the school community, increasing COVID-19 cases in the region/county, the operation and status of the local school district, guidelines from local health departments, and at the discretion of the School Leadership and Director of School Quality.

In a fully remote environment, the school will utilize synchronous small group lessons and asynchronous lessons. Content in both our remote and hybrid plans is the same, it is just the mode of delivery that shifts. In a hybrid environment, the mode of delivery will shift from synchronous small groups to in-person instruction. The hybrid model will also continue to prioritize student engagement, consistency, and differentiation opportunities.

Our teachers will be provided with information about best practices for blended learning, grade-level proficiencies, modes of student assessment and feedback, differentiated support opportunities for students, and guidance around daily instructional time. Teachers will continually monitor and assess students' connectivity and accessibility, attendance, and student work.

Students with IEPs and 504s will access the same learning opportunities that are offered to general education students. These learning activities and supports will address student needs identified within any IEP, to the extent appropriate. Special education providers will collaborate with general education teachers to ensure the provision of accommodations and modifications (when appropriate) that allow students to access learning opportunities.

While the above reflects our current intentions, we understand the need for great flexibility and adaptability, and we recognize the importance of modifying our plan based on the changing needs of our school community.

## Virtual Option

The school is exploring the possibility of a completely virtual learning opportunity for parents who do not feel comfortable or safe returning their students to a traditional or hybrid learning environment due to the nature of the pandemic. It is our goal that providing this option will help us to retain students and families that may fall into this category. More information about this will be made available to our families when it is available.

Regardless of the learning environment the school will follow the below strongly recommended items:

- ✓ Set an instructional vision that ensures that every student will start the year with access to grade-level instruction and high quality, standards-aligned instructional materials in every subject;
- ✓ Ensure every student will be assessed on their understanding of prerequisite skills and grade-level proficiencies using formative assessments, screeners, or diagnostics;
- ✓ Identify students who did not engage in remote learning previously during the spring and develop a plan to provide additional support as necessary;
- ✓ Find ways to integrate high quality digital tools and resources into in-person instruction to ensure a seamless transition should remote or hybrid instruction be needed;
- ✓ Provide opportunities for differentiation, intervention, and remote learning based on the needs of the student;
- ✓ Provide opportunities outside the classroom to support students in need of additional support or intervention;
- ✓ Ensure that every students' academic and social-emotional needs are addressed with the integration of Social and Emotional Learning (SEL) and strengthening connections with students;
- ✓ Support teachers to utilize power standards that identify the major work of the grade in order to focus, prioritize, and accelerate instruction;
- ✓ Review and revise student IEPs, IFSPs, and 504 plans as necessary based on a student's evolving needs, including needs that identified based on time away from provided services when the building was/is closed;
  - IEP teams will work collaboratively to ensure that FAPE is being delivered to each student with an IEP or Section 504 Plan. Data and collaboration with multiple stakeholders will drive necessary supports and accommodations for the student to access FAPE.
  - IEP teams will determine the best way to deliver a FAPE considering a starting point for instruction once school resumes in the fall.
- ✓ Create a plan for professional development that offers restorative supports for teachers and learning around equity and implicit bias, social-emotional learning, and culturally responsive education as needed;
- ✓ Provide professional development for teachers about remote and blended learning tools, best practices, and experiences to ensure they are equitable and engaging; and

- ✓ Deans will conduct checkpoints with teachers on curriculum pacing and ongoing monitoring student progress. Together teachers and deans will review student data to identify overall trends and gaps to guide instruction; and
- ✓ Remain connected with MDE regarding updated policies, guidelines, or requirements.

### **Not Implementing**

The following is a list of the instructional strong recommendations the school is not implementing:

- Secure supports for students who are transitioning to postsecondary

### *Communications and Support*

The Academy will ensure that it is effectively and efficiently communicating with its families, ensuring that every family is aware of expectations for students returning to school, clear information about schedules including any hybrid modified schedules, and the plans for the school in each possible learning environment. Information is provided to families via the school's SchoolMessenger system which sends an email and text to every family. Information will also be provided in school newsletters, back to school information, social media sites, and the school's website as necessary. If the school is required to operate in a remote or hybrid environment, the school will ensure parents are provided the necessary resources, strategies, and training to support their students' learning. All official school communication is translated into students' home languages as needed.

### **Phase 4 Operations**

#### *Facilities*

The Academy will follow all state and local guidelines including all strong recommendations included in the Phase 4 Facility plan. NHA has developed a Facilities Preparedness and Response Plan and is working in partnership with Aramark, our janitorial service provider. Aramark staff will be well-equipped with training, guidance, and protocols for supplying, cleaning, sanitizing, and disinfecting the school safely. Face masks will be provided and worn by janitorial staff and all school staff.

Summer deep cleaning, maintenance, and building improvements such as handwashing signs, social distancing reminders, floor markings, etc. are being completed at the buildings and will be done in time for school to open. The number of and size of classrooms and additional spaces available (i.e. gymnasium) have all been analyzed and considered while planning for the upcoming school year. School safety and security practices have also been analyzed, considered, and updated where necessary.

School leadership will be conducting a facility walk-through in partnership with the janitorial services team to ensure that classrooms, common spaces, and the exterior of the building are ready for staff and students.

### **Not Implementing**

The following is a list of the operations strong recommendations the school is not implementing:

- Coordinate with Local Emergency Management Programs for support with procurement of cleaning and disinfection supplies. Advocate for ISDs to coordinate with LEMPS.

- This is not applicable for our school as our janitorial partner, Aramark handles the procurement of these items for us.

### *Budget*

We are utilizing funds driven from the CARES act to help with costs we incur related to COVID. We also are spending a lot of time engaging with state, ISD officials on clarity around legal and appropriate uses, compliance and reporting requirements, etc.

The school in partnership with NHA will monitor and amend the school's budget as necessary to adjust for potential changes in enrollment, staffing needs, and state funding changes.

### *Food Service*

The school will follow all federal, state, and local guidelines regarding food service. Any changes in policy will be communicated with all necessary staff.

### *Enrollment*

The school is finding creative ways to adapt its traditional summer onboarding and back-to-school events. School Ambassadors and Admissions Reps are assisting schools by pre-packaging information, providing clean pens, hand sanitizer, and masks at events. Some events are going virtual where appropriate. Other events are able to be held in new ways such as outside, a multiple-night event to allow for social distancing, or as a drive-in event. When allowable, tours for new families are being conducted with increased safety measures.


Any enrollment or attendance requirement changes or policy changes will be communicated with all stakeholders timely. Back to school information, including all pertinent information and changes in school policies, will be sent to all relevant stakeholders.

Important school documents will be made available digitally when possible. This is done via the Parent Portal on the school's website. The Parent and Student Handbook is also available on the school's website.

### *Staffing*

School leadership in partnership with NHA's People Services Department will continue to monitor staffing for the upcoming school year and develop a staffing plan that takes in account teachers that may not be returning. Staff who self-identify as high risk will be directed to the People Services department. The People Services department will review possible alternative work depending on the structure of the school. If an alternative work assignment is not feasible, staff will be offered a leave of absence.

The school in partnership with NHA's People Services Department will assess the need for new or additional positions as needed, what additional responsibilities staff will need to take on, redeploy staff as needed, and recruit, interview, and hire school personnel as needed. Available sub personnel will also be monitored and adjusted as necessary. Any new staff will be oriented to current and new school policies as applicable. Master teaching schedules, arrival/dismissal schedules, lunch schedules, and bell schedules will be created with student and staff safety in mind. NHA's Legal Counsel will preemptively address liability questions, related concerns, or vendor issues relative to COVID-19 as necessary.



## *Technology*

A family survey regarding reliable and effective Internet and device access was completed prior to the beginning of the 2020-21 school year. During the 2020-21 school year, NHA will be providing each student with a laptop. It is our hope that this helps eliminate barriers such as lack of devices. Additionally, should the school need to move to a hybrid or remote learning model, each student will already have access to an appropriate device.

Our LTS will be the school's technology support lead. Families will have the contact telephone number and email for the LTS. Additionally, NHA will support each individual school with a 1-800 hotline number for additional technology support. To safely manage device repairs/replacements during period of remote instructions, each LTS or TTC has received training on the safe handling of returned materials, has cleaning/disinfection supplies provided by NHA/Aramark, and has procedures to follow for the packaging of devices for replacement. In addition, the classroom teacher and dean will also support families who need technology support. They will connect with the families to ensure students can access the materials and have appropriate logins and passwords.

The school will look for ways to leverage the 1:1 student to device ratio even when in a traditional in-person learning environment. The school's technology plan will be reviewed and improved as appropriate.

## *Transportation*

The school partners with a third-party vendor to provide busing for our students. This vendor will handle the necessary operational COVID-19 implications such as inventorying vehicles, assessing contractors, and finalizing policies and procedures.



## Plan for Operating during Phase 5 of the Michigan Safe Start Plan

### **Phase 5 Safety Protocols**

When the state reaches Phase 5, the school will make every effort to resume traditional in-person instruction. However, local health department guidelines, increased community COVID-19 cases, or the presence of COVID-19 cases in the school community may cause the school to transition as necessary into a hybrid or remote environment.

The school will remain flexible and vigilant to ensure the safety of our students. While no longer required, the school will implement recommended safety guidelines from the state and local health departments as is necessary to ensure the health and safety of our students, staff and community. These safety precautions may include:

- ✓ Face coverings/masks will be required for all staff and students 6-8, unless medically unable to wear a mask, whenever not able to social distance. This will be re-evaluated based on the latest CDC, state, and local health department guidance.
- ✓ Face coverings/masks will be recommended for K-5 students, whenever not able to socially distance.
- ✓ Each classroom will be equipped with hand sanitizer, Virex Disinfectant, paper towel, and disinfecting instructions.
- ✓ Staff and students will be reminded and encouraged to practice social distancing, healthy hand hygiene, and mask use. Signage will be posted regarding social distancing, handwashing, and COVID-19 symptoms. One-way traffic markings will be applied as appropriate.
- ✓ Desks will remain spaced as close to six feet apart as possible.
- ✓ Student movement will be limited whenever possible. K-5 students will remain with their homeroom cohort whenever feasible. This may include teachers, including Specials teachers, rotating in and out of classrooms rather than students.
- ✓ Arrival and dismissal practices will be monitored to ensure social distancing and mask use where appropriate.
- ✓ The school will have a designated isolation room for students or staff who feel ill or potentially screen positive on a health screening. Face coverings must be used while in the isolation room.
- ✓ Symptomatic staff or students will be sent home and may not return until they have either tested negative or have recovered according to CDC guidelines.
- ✓ Staff will continue to complete daily health screenings prior to coming to work.
- ✓ The school will cooperate with the local public health department regarding the implementation of screening and testing of students and staff. When and where necessary, we are prepared to do a temperature scan of students as they arrive at the building.

- This may differ from Phase 4 as health departments may request this less often in Phase 5. However, we will still be prepared to complete these screenings if necessary.
- Parents will be encouraged to screen their children before sending them to school.
- ✓ Visitors will still be limited from the building as much as feasible. Any necessary guests will be screened for symptoms, be required to wear a mask, and sanitize their hands upon entrance. A log will be kept of all visitors entering and exiting the building.
  - Signage will remain on the building limiting entry to the building for anyone experiencing any COVID-19 symptoms.
  - In Phase 5, the school may allow more parents or guardians into the building. However, parents should wash or sanitize their hands upon entry and follow all standard visitor protocol.
- ✓ If there is a confirmed case in which reporting is necessary, the People Services Business Partner for the school will report the case to the local department of health. The People Services Business Partner will communicate to the NHA Facilities team to ensure proper cleaning is done and will also partner with the communications team to ensure the proper stakeholders are notified in a timely manner, while also ensuring compliance with employee and student confidentiality and HIPAA requirements.
  - The school will assist the local health department in its efforts to contact trace.
- ✓ Upon cases of suspected or confirmed COVID-19 cases in the building, the Facilities Preparedness and Response Plan calls for a move into a Level 3 Response Procedure. Within 0-24 hours of the last known presence of a suspected/confirmed case in the facility all known areas accessed by the case will be closed and vacated. Partial or full building closure will be done as deemed necessary by the school leadership. Aramark personnel will prepare for full disinfection cleaning after 24 hours has passed. Aramark personnel will utilize enhanced PPE (gloves, face masks, gowns) during their disinfection cleaning. Re-entry will not be permitted until disinfection cleaning will be complete. The duration of disinfection cleaning will depend on the extent of areas visited in the facility by the suspected/confirmed case.
- ✓ Where possible, students will eat lunch in their classroom. When not feasible, students will be socially distanced as much as possible.
- ✓ The school will follow the latest guidelines regarding large gatherings such as assemblies, performances, etc. This may mean the school has more flexibility to hold such events under Phase 5.
- ✓ Athletic equipment will be disinfected before and after use and all participants must use proper hand hygiene before and after practice or games.
  - More spectators are allowed for athletics under Phase 5, however, social distancing will still be required.
- ✓ All high touch point locations such as light switches, door handles, bathroom faucet handles, etc. will continue to be disinfected three times a day (mid-morning, mid-afternoon, and evening)
  - Hands-on rooms such as libraries, computer labels, etc. will be disinfected between each group.

- All cleaning materials are EPA approved for use against COVID-19.
- Classrooms will be provided with Virex Disinfectant so teachers can disinfect desks in between classes as necessary.
- ✓ Any busing or student transportation (including field trips) will follow all guidelines from Phase 4 such as hand sanitizer, spacing, etc.
- ✓ All current plans for accommodating students with special healthcare needs (e.g. Individual Healthcare Plans, Individualized Education Programs, Individualized Family Service Plans, or 504 plans) will be reviewed and updated as necessary to decrease their risk for exposure to COVID-19.
- ✓ Staff who self-identify as high risk will be directed to the People Services department. The People Services department will review possible alternative work depending on the structure of the school. If an alternative work assignment is not feasible, staff will be offered a leave of absence. The Academy is exploring the possibility of a completely virtual learning opportunity. Such an opportunity may be able to be utilized for students who self-identify as high risk.

At this time, we do not anticipate many safety protocols to be different from Phase 4. However, we will re-evaluate each safety protocol as necessary and in accordance with the latest CDC, state, and local health department guidance.

### **Phase 5 Mental & Social-Emotional Health**

As educators, we need to do everything in our arsenal to reduce the effects of trauma so that students can learn at an optimal level. Trauma does not discriminate between urban and suburban students as people will perceive threats like COVID-19 in their own way. It is imperative that our organization continues to nurture the hearts and minds of our children and staff and show a thoughtful, innovative response from schools and networks as we strive to support students' mental health.

The school will continue to find ways to support the social, emotional, and mental health of our staff and students as outlined in Phase 1, 2, and 3, and Phase 4. We will continue to look for better ways to meet all of these needs as well be trauma informed.


### **Phase 5 Instruction**

When the state reaches Phase 5, the school will make every effort to resume traditional in-person instruction. However, local health department guidelines, increased community COVID-19 cases, or the presence of COVID-19 cases in the school community may cause the school to transition as necessary into a hybrid or remote environment. The school will be prepared to do so when required.

The school will continue to follow the below MI Safe Schools recommended items:

- ✓ Set an instructional vision that ensures that every student will start the year with access to grade-level instruction and high quality, standards-aligned instructional materials in every subject;

- ✓ Ensure every student will be assessed on their understanding of prerequisite skills and grade-level proficiencies using formative assessments, screeners, or diagnostics;
- ✓ Find ways to integrate high quality digital tools and resources into in-person instruction to ensure a seamless transition should remote or hybrid instruction be needed;
- ✓ Provide opportunities for differentiation, intervention, and remote learning based on the needs of the student;
- ✓ Provide opportunities outside the classroom to support students in need of additional support or intervention;
- ✓ Ensure that every students' academic and social-emotional needs are addressed with the integration of Social and Emotional Learning (SEL) and strengthening connections with students;
- ✓ Support teachers to utilize power standards that identify the major work of the grade in order to focus, prioritize, and accelerate instruction;
- ✓ Review and revise student IEPs, IFSPs, and 504 plans as necessary based on a student's evolving needs, including needs that identified based on time away from provided services when the building was/is closed;
  - IEP teams will work collaboratively to ensure that FAPE is being delivered to each student with an IEP or Section 504 Plan. Data and collaboration with multiple stakeholders will drive necessary supports and accommodations for the student to access FAPE.
  - IEP teams will determine the best way to deliver a FAPE considering a starting point for instruction once school resumes in the fall.
- ✓ Create a plan for professional development that offers restorative supports for teachers and learning around equity and implicit bias, social-emotional learning, and culturally responsive education as needed;
- ✓ Provide professional development for teachers about remote and blended learning tools, best practices, and experiences to ensure they are equitable and engaging; and
- ✓ Deans will conduct checkpoints with teachers on curriculum pacing and ongoing monitoring student progress. Together teachers and deans will review student data to identify overall trends and gaps to guide instruction; and
- ✓ Remain connected with MDE regarding updated policies, guidelines, or requirements.
- ✓ Effectively and efficiently communicate with its families, ensuring that every family is aware of expectations for students returning to school, clear information about schedules including any hybrid modified schedules, and the plans for the school in each possible learning environment. Information is provided to families via the school's SchoolMessenger system which sends an email and text to every family. Information will also be provided in school newsletters, back to school information, social media sites, and the school's website as necessary. If the school is required to operate in a remote or hybrid environment, the school will ensure parents are provided the necessary resources, strategies, and training



to support their students' learning. All official school communication is translated into students' home languages as necessary.

## **Phase 5 Operations**

The school will continue to follow all recommendations as outlined in Phase 4 including:

- ✓ Providing proper cleaning and disinfecting janitorial services. This is provided in partnership with Aramark who handles the following:
  - Audit and order any necessary materials or supplies for cleaning or disinfection
  - Summer deep cleaning, maintenance, and building improvements such as handwashing signs, social distancing reminders, etc.
  - Providing additional training for employees on cleaning and disinfecting for COVID-19
- ✓ Conducting a facility walk-through in partnership with the janitorial services team to ensure that classrooms, common spaces, and the exterior are ready for staff and students to return.
- ✓ Monitoring the school's budget as necessary to adjust for potential changes in enrollment, staffing needs, and state funding changes
- ✓ Following all federal, state, and local guidelines regarding food service
- ✓ Monitoring staffing in partnership with NHA's People Services Department for the upcoming school year and throughout to:
  - Assess additional responsibilities for staff;
  - Redeploy staff as needed;
  - Recruit, interview, and hire school personnel as needed.
- ✓ Creating and modifying master teaching schedules, arrival/dismissal procedures and schedules, and bell schedules with student and staff health and safety in mind
- ✓ Providing each scholar with a laptop and necessary technological supports

As we embark on an uncertain new school year, the school will remain flexible and adapt as needed to the changing needs of its students, staff, and community and this plan will be amended as necessary.

# National Heritage Academies

## COVID-19 PREPAREDNESS & RESPONSE PLAN

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### 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 established<sup>1</sup>. 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.<sup>2</sup>

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).

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<sup>1</sup> CDC: Cleaning and Disinfecting Your Facility. COVID-19.

<sup>2</sup> 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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