



# Whiteriver Unified School District

## Return to Learning Plan

The Centers for Disease Control and Prevention (CDC) and the Arizona Department of Education (ADE) recommend that reopening decisions be driven by the current prevalence of COVID-19 in the community. The policy recommendations that follow do not address whether a district should reopen, but instead address risk mitigation once the decision to reopen has been made. They are based on CDC “step” guidelines—specifically, Steps 2 and 3. Step 2 protocols, which include enhanced social distancing measures, should be followed until guidance from Arizona public officials indicates that a transition to Step 3 protocols—which include relaxed social distancing measures—is appropriate.

## TABLE OF CONTENTS

STAFFING ASSIGNMENTS .....	2
TRAINING AND COMMUNICATION.....	3
Training.....	3
Communication.....	3
STEP 2 PROTOCOLS: STUDENTS ON CAMPUS.....	3
Daily Health Screenings.....	3
Enhanced Social Distancing .....	5
Hand Washing .....	8
Cloth Face Coverings .....	9
Student Belongings/Materials .....	9
Trips and Activities.....	10
Specialized Classes.....	10
STEP 2 PROTOCOLS: EMPLOYEES .....	10
Exposure Assessment and PPE .....	10
Visitors to School .....	10
Daily Screening.....	10
Handwashing .....	11
Enhanced Social Distancing .....	11
Cloth Face Coverings .....	12
Cleaning and Disinfecting .....	12
STEP THREE PROTOCOLS: STUDENTS ON CAMPUS .....	13
Introduction .....	13
Social Distancing .....	13
Trips and Activities.....	14
PROCEDURES FOR COVID-19 SYMPTOMS OR A POSITIVE TEST .....	14

# Whiteriver Unified School District

## COVID-19 Protocols for Re-Opening Schools

The Centers for Disease Control and Prevention (CDC) and the Arizona Department of Education (ADE) recommend that reopening decisions be driven by the current prevalence of COVID-19 in the community. The protocols that follow do not address whether a district should reopen, but instead include recommendations for mitigating risk once the decision to reopen has been made. The protocols are based on CDC “step” guidelines—specifically, Steps 2 and 3. Step 2 protocols, which include enhanced social distancing measures, should be followed until guidance from Arizona officials indicates that a transition to Step 3 protocols is appropriate.

WUSD will implement a Three Phase Return to School plan, working with local and state health officials (WMAT Emergency Operations Committee, local Indian Health Services Staff, and Navapache County Health Director, AZ Health Directors) to determine what data points indicate when we can safely move forward from one phase to the next or, when data indicates that we must move back in phases to ensure student, staff and public health.

**Whiteriver Unified School District's commitment is for the safety and well-being for students and staff. The following are options being considered as part of an overall return to school plan, that the Governing Board will approve at a later date.**

	PHASE 1	PHASE 2	PHASE 3																		
<b>Pre-K-3rd Grade</b> Elementary campus	<p><b>All Grades</b></p> <ul style="list-style-type: none"> <li>Online curriculum Monday through Friday</li> <li>Hotspots &amp; Chromebooks will be issued</li> </ul>	<p><b>Option 1</b></p> <ul style="list-style-type: none"> <li>Online curriculum Monday through Friday</li> <li>Hotspots &amp; Chromebooks will be issued</li> </ul> <p><b>Option 2</b></p> <ul style="list-style-type: none"> <li>Small class sizes (10-12 students)</li> <li>Schedule: Monday-Thursday</li> <li>Friday in-person intervention only for students in need</li> </ul>	<p><b>All Grades</b></p> <p>Gradual return to on-site instruction.</p>																		
<b>4th-6th Grade</b> Canyon Day campus	<p>Chromebooks will be issued</p> <ul style="list-style-type: none"> <li>Staff teaching virtually</li> </ul>	<p><b>Option 1</b></p> <ul style="list-style-type: none"> <li>Online curriculum Monday through Friday</li> <li>Hotspots &amp; Chromebooks will be issued</li> </ul> <p><b>Option 2</b></p> <ul style="list-style-type: none"> <li>On campus at CDJH</li> </ul> <table border="1"> <thead> <tr> <th>Schedule</th> <th>MON</th> <th>TUES</th> <th>WED</th> <th>THUR</th> <th>FRI</th> </tr> </thead> <tbody> <tr> <td>Student A</td> <td>On-Campus</td> <td>On-Line</td> <td>On-Campus</td> <td>On-Line</td> <td>On-Campus</td> </tr> <tr> <td>Student B</td> <td>On-Line</td> <td>On-Campus</td> <td>On-Line</td> <td>On-Campus</td> <td>On-Line</td> </tr> </tbody> </table>	Schedule	MON	TUES	WED	THUR	FRI	Student A	On-Campus	On-Line	On-Campus	On-Line	On-Campus	Student B	On-Line	On-Campus	On-Line	On-Campus	On-Line	<p>Process TBD in coordination with state and local EOC recommendations.</p>
Schedule	MON	TUES	WED	THUR	FRI																
Student A	On-Campus	On-Line	On-Campus	On-Line	On-Campus																
Student B	On-Line	On-Campus	On-Line	On-Campus	On-Line																
<b>7th-12th Grade</b>	<p>Decision will be based on State mandates and local EOC.</p>	<p><b>Continue On-Line</b></p> <ul style="list-style-type: none"> <li>Online curriculum Monday through Friday</li> <li>Hotspots &amp; Chromebooks will be issued</li> </ul>																			
	<b>HIGH COVID-19 RISK</b>	<b>MODERATE COVID-19 RISK</b>	<b>LOW COVID-19 RISK</b>																		
<b>Health &amp; Safety:</b>	<ul style="list-style-type: none"> <li>Students will have temperatures taken before entering building or bus</li> <li>Sick students and staff will be sent home</li> <li>Students eat in classrooms.</li> <li>Extra staff hired to disinfect &amp; clean high traffic areas</li> </ul>	<p><b>Health &amp; Safety:</b></p> <ul style="list-style-type: none"> <li>Plexiglas barriers as needed</li> <li>Desks will be placed 5-6 feet apart</li> <li>4th-5th grade teachers from elementary schools will temporarily working at Canyon Day campus, this is to allow for low class sizes</li> </ul>	<p><b>Health &amp; Safety:</b></p> <ul style="list-style-type: none"> <li>3rd-12th Grade Staff and students will wear face masks</li> </ul>																		

These options will be reviewed for overall effectiveness and safety every 1-2 weeks. Parents will be notified of any changes.

The following protocols are to be implemented across all district sites. Normal procedures for students who qualify for homebound or chronic ill services will be followed, as will normal procedures for employee requests for reasonable accommodation due to disability.

## STAFFING ASSIGNMENTS

At the district level, the superintendent and public information officer (PIO) will coordinate all messages to students, parents, staff, and the community regarding reopening, possible closure, and other COVID-19-related information. The WUSD Wellness Subcommittee will ensure that each site has posters with messaging on hand-washing and covering of coughs and sneezes located throughout, along with posters at site entrances reminding individuals not to enter if sick.

At each school or site, a site administrator or designee will coordinate social distancing protocols, including ensuring that student and staff schedules, as well as facility set-up, allow for implementation of the protocols.

At each school or site, the lead custodian will coordinate implementation of cleaning protocols, including ensuring that sufficient cleaning supplies are available to janitorial staff and, as appropriate, students and staff.

At each school, the site administrator, the school CNA, or other designee will coordinate and implement the protocols set forth in the **Step Two Protocols: Employees** section of this document for screening of staff. That individual will be responsible for:

- communicating any reported case of COVID-19 among the school population to the superintendent, and
- informing the superintendent if absences of students and staff on any given day are above 25%, or if there appears to be a cluster of respiratory-related illnesses.

The Exceptional Student Services Director will coordinate with site-based case managers to ensure that the needs of special education students and students with special needs are being met in the context of implementation of these safety protocols.

In conjunction with district administration, athletic directors and coaches will develop protocols that incorporate applicable Arizona Interscholastic Association (AIA) and CDC recommendations for athletic activities.

## TRAINING AND COMMUNICATION

### Training

Prior to students returning to campus, all staff will be trained on implementation of these protocols. Training will include proper use of PPE and supplies; cleaning and disinfecting; and other measures.

### Communication

Prior to students returning to campus, parents will be sent a copy (or directed to review a copy on the district or school website) of the portions of these protocols that relate to students and visitors. As part of this process, the district will send communication to all parents that outlines the symptoms for which parents must screen each morning, as well as the expectation that students will not be sent to school or placed on the bus if they are exhibiting any symptoms. The district will require a signed acknowledgement from parents regarding these protocols.

At each school site, Certified Nursing Assistants and the site Principal will be the designated COVID-19 points of contact, which will be communicated to parents prior to the first day of school. These staff members will be responsible for answering parent questions regarding implementation of COVID-19 protocols.

## STEP 2 PROTOCOLS: STUDENTS ON CAMPUS

Step 2 protocols are established based on community monitoring that reveals low levels of community spread of COVID-19. These practices are put in place as part of a general scale-up of operations.

### Daily Health Screenings

#### At home

WUSD will inform students and parents that students must not come to school if they exhibit any of the following symptoms:

- fever of 100.4 degrees or higher, or chills;
- shortness of breath or difficulty breathing;
- muscle aches;
- sore throat;
- headache;
- fatigue;
- congestion or runny nose;
- cough;

- vomiting;
- diarrhea; or
- new loss of taste or smell.

WUSD will also inform parents via registration documents, on the school website, and via email reminders that they should screen students for the above symptoms each morning, should self-report symptoms, and must keep students at home if any symptoms are present. Students will have the opportunity to make up work missed due to symptoms of COVID-19.

Note: Schools will not give out attendance awards for the duration of the COVID-19 health crisis.

### On the bus

All buses will have clearly visible signage communicating to parents that students should not enter the school bus with any of the above symptoms.

A bus monitor, wearing appropriate personal protective equipment (PPE), will visually check each student prior to the student boarding the bus. If a student exhibits visible symptoms,<sup>1</sup> the following steps will be taken:

- If the parent is at the bus stop, the student will return to their parent.
- If the parent is not at the bus stop, the student will be provided with a mask if they do not have one already, and—if possible—will be situated so as to be socially distanced from other persons.

If a student has a chronic condition such as allergies or asthma, parents should inform staff of that condition. If staff has been so informed, students with symptoms of runny nose or cough should be permitted to ride the bus.

### At school

Upon arrival at school, each student will proceed directly to the student's first period classroom.

A staff member, wearing appropriate PPE, will visually check each student and may take temperatures with a non-contact thermometer prior to students entering the school. Any student with visible symptoms of runny nose, cough, shortness of breath, or vomiting, or one who has a fever at or above 100.4 degrees, will be taken to the health office. Parents may be contacted for pick-up with the following exceptions:

---

<sup>1</sup> Visible symptoms include runny nose, cough, shortness of breath, or vomiting.

- If the student has a runny nose and the nurse/health aide observes that there are no other symptoms, the nurse/health aide will contact the parent to inquire as to whether the student has had any other symptoms or there have been any COVID-19 exposures in the home. If not, the student may return to class.
- If the student has health information on file that confirms a diagnosis of asthma or other respiratory condition and the nurse/health aide observes that there are no other symptoms, the nurse/health aide will contact the parent to inquire as to whether the student has had any other symptoms or there have been any COVID-19 exposures in the home. If not, the student may return to class.

### **Enhanced Social Distancing**

#### Start of School Protocol

If COVID-19 transmission should stabilize and allow for some on campus instruction to take place (see Three Phase Return to School p.1) , Whiteriver Unified School District will implement the following instructional framework in an effort to provide opportunities for greater social distancing AND opportunities for face-to-face instructional support for the students who need this the most:

**Students in grades 7-12 will continue school in a virtual (on-line) learning environment.** Special student populations that need face-to-face time with teachers in order to meet instructional program requirements or individual education plan goals will be informed of options to attend school in person.

**Students in grades 4-6 will transition to school on an A/B schedule at the Canyon Day Junior High School Campus.** This means half of students will attend school in person on Mondays and Wednesdays. And half of students will attend school in person on Tuesdays and Thursdays. On days that students are not attending school in person, they will attend class virtually (on-line). Friday mornings will be used for in person and virtual intervention instruction or at home instructional practice (as needed). This schedule allows significant social distancing protocols to be put in place as only half of students will be on campus on any given day. We are temporarily moving fourth and fifth grades to another campus to allow for more classroom space at the elementary schools. Fourth and fifth grade teachers from each elementary campus will provide instruction to their assigned classes at CDJH.

***Families that do not wish to send students physically to school in August will have the option of selecting a virtual (on-line) learning environment.***

**Students in grades PreK-3 will transition to school on-site with small class sizes.** All instructional staff will be utilized to ensure that we have class sizes of 10-12 students per room in order to practice significant social distancing practices. Students will attend

school Monday-Thursday. Friday mornings will be used for in-person and on-line intervention instruction or at home instructional practice (as needed).

***Families that do not wish to send students physically to school during Phase 2 will have the option of selecting a virtual (on-line) learning environment.***

The above instructional framework will be in place for 6-8 weeks after which time the protocol will be re-evaluated and a plan created and communicated for the next 6-8 weeks of instruction.

See Appendix A for sample form that families will complete to indicate their preference during Phase 2 instruction.

#### Basic social distancing practices

Staff members will educate and remind students regularly to maintain at least 6 feet of distance between individuals at all times possible.

Students will remain with the same groupings and limited staff members throughout the day. We are putting protocols in place that reduce class sizes.

#### Additional social distancing practices

##### *Drop-off/Pick-up procedures.*

School sites will implement staggered drop-off and pick up times so that not all students arrive on campus at the same time. School administrators will determine the staggered arrival and pick-up times in a way that best meets the individual schools' needs and reduces the number of students in common areas at the same time.

Parents will be required to drop off/pick up students without getting out of the car, unless express permission from a site administrator is provided for good cause. If a parent has permission to get out of the car during drop-off/pick-up, students will be scheduled to arrive at/leave school before or after assigned times for the majority of students.

##### *Bus transportation seating options.*

To the greatest extent possible given bus capacity, students will be assigned to bus seats with one student per row and, when possible, an empty row between students. Where students can be assigned one per row, they will be assigned to the seat closest to the window. Maximum bus ventilation will be maintained at all times, including open windows (weather permitting). Ventilation will be set to non-recirculating mode.



- Students will be required to wear cloth face coverings when on a school bus unless a health condition prevents this.
- Staff will be required to wear cloth face coverings when on a school bus unless a health condition prevents this. Bus drivers may wear face shields.
- Buses will be loaded from back to front at bus stops, and unload front to back when at school (to minimize students passing by other students).
- Siblings will be allowed to sit together if they wish.

Bus monitors will be on every morning bus run. Bus monitors will assist with monitoring for symptoms, reminders to wear face masks on the bus, and socially distanced seating.

*Classroom layout.* For all grades, mark classroom floors with adhesive tape to indicate where individual desks/workspaces will be located.

Position desks 6 feet apart unless that spacing is not possible due to the size of the classroom and the number of students assigned to it. If desks cannot be positioned 6 feet apart, consider requiring cloth face coverings, unless a health condition prohibits this.

Position desks to face the same direction rather than facing each other. Do not use large tables for groups of students unless this is the only option. If this is the case, the district may consider requiring cloth face coverings.

Do not permit students to be physically grouped to work together. Instead, encourage teachers to use technology to facilitate group work and group learning where appropriate for the age, subject, and capabilities of the students.

*Communal spaces.* Guidelines for specific communal spaces are given below.

Hallways: Mark hallways with adhesive tape to direct students to stay on one side of the hallway for each direction of travel. Where possible given the school layout, certain hallways may be designated one-way.

Playgrounds:

One class at a time will be allowed on playground equipment. Classes will be scheduled with time slots so that there is sufficient time between classroom use that playground equipment can be disinfected before the next group uses it. Teachers will be creative in employing techniques to maintain social distancing during unstructured time. Finally, require teachers and students to wash their hands following activities.

Lunch rooms:

Lunches will be served in classrooms and in multipurpose (cafeteria) rooms with increased social distancing measures. Students eating meals in classrooms will be served on disposable food service items (trays, plates, etc.). If a classroom has a student with food allergies, a 504 team will be convened to discuss appropriate accommodations. These may include, for example, taking the student to another location, such as a school conference room or the multipurpose room, with one friend (so long as social distancing can be maintained in the alternate location).

Students eating in the multipurpose room during lunch, with increased safety measures, will adhere to the following:

- Mark tables in the multipurpose room to indicate where students may sit.
- Assign students to a specific seat with a minimum of 3 feet between marked seats.
- Limit multipurpose room seating to the number of assigned seats.
- If students line up for lunch service, permit only one class to line up at a time, and place markings on the floor to indicate where students should stand to maintain social distancing. Alternatively, serve food to each student at their assigned seat.
- Serve lunches on disposable food service items (trays, plates, etc.), if possible. If disposable items cannot be used, have food service staff collect items while wearing gloves.
- Prohibit students from sharing lunch items with one another.

*Bathrooms.* Students will be permitted to enter bathrooms in groups no larger than the number of stalls/urinals in the bathroom, and direct them to maintain social distancing. The number of students allowed in the bathroom will be limited to allow an empty sink between students during handwashing. Finally, posters reminding students of proper handwashing techniques will be displayed.

*Front offices.* Sneeze guards or other partitions will be installed in front of the front desk. Adhesive tape will also be placed on the floor 6 feet from the front desk with posted signage directing visitors not to come closer than the tape markings.

### **Hand Washing**

Portable handwashing stations will be placed at all campuses. All students will be required to wash their hands with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol at the following times:

- prior to getting on a school bus
- upon arrival at school (use hand sanitizer if there is no sink in the classroom),

- after being outside for physical activity,
- before and after lunch,
- prior to changing classes at the high school
- prior to leaving school for home, and
- after sneezing, coughing, or blowing nose.

### **Water Fountains**

Due to the risk of contagion each water fountain will be completely shut off. In order to ensure children and staff have access to water each school will be provided with a minimum of one centrally located water bottle filling station. Students will be allowed to have a fillable, closed top water bottle with them daily.

### **Use of Face Coverings**

Except as stated below, all persons, including, but not limited to, staff, students, vendors, visitors, and volunteers, shall wear a face covering while on any District property, in any District facility, at any District event, whether indoors or outdoors, and in any District vehicle, including District busses or vehicles rented or leased by the District.

Face coverings should not be worn by:

- A. Children under the age of two (2);
- B. Anyone who has trouble breathing;
- C. Anyone who is unconscious, incapacitated, or otherwise unable to remove the face covering without assistance.

Face coverings are to fully cover a person's nose and mouth, ideally fitting snugly but comfortably against the sides of the face and under the chin. They are to remain affixed in place without the use of one's hands and are to not have holes. They are to be laundered regularly or disposed of appropriately. Cloth Fface masks should be washed in hot water after each daily wearing.

Face shields may be an acceptable alternative to masks.

Students Pre-k through 2nd grade under the age of five will be encouraged, but not be required to wear a face covering mask. Parents will be notified that schools cannot ensure that students younger than grade 3 child will keep a face covering mask on but teachers and staff members shall use reasonably diligent efforts to promote consistent use of face coverings by students. Schools will have a supply of cloth masks for children reporting without a face covering mask:

1. All students 5 years old and up will be required to wear a

face covering while at school. Families/Students are responsible for bringing a face covering from home and for washing cloth face masks daily or appropriately disposing of disposable masks.

2. WUSD will provide teachers and bus drivers with 1 face shield that they are responsible for sanitizing themselves.

3. WUSD will use the discipline matrix for dress code violations to enforce the wearing of face coverings.

4. WUSD will have a supply of face masks on hand for students in need.

5. WUSD will have a supply of face shields available for use at school for students who can show a documented need, such as asthma, etc.

6. Students shall not be required to wear face coverings when students can socially distance or are outside in playground settings with distancing.

7. Students shall be allowed breaks to remove their face covering in a safe environment.

A face covering does not replace the need for frequent hand washing, covering coughs and sneezes, and practicing physical distancing (six feet away) to the extent possible. Individuals are to be reminded to avoid touching their face covering and to wash their hands frequently. To ensure the proper use of face coverings, staff and students are to be educated on how to wear and care for their face coverings.

### **Student Belongings/Materials**

For younger grades student belongings will be kept in individual bins or cubbies labeled with each student's name. Personal belongings will be sent home for cleaning each day. School manipulatives/instructional resources will be sanitized with disinfectant after each use. School supplies will be provided to avoid the need to share most items between students.

### **Trips and Activities**

Field trips will be canceled. Teachers will use virtual learning opportunities (such as virtual tours of museums) to enhance students' educational experiences.

School-wide assemblies may not be held with students assembled in the same physical location.

Large-scale school events such as “Back to School Night” or fall carnivals will be cancelled or reconfigured in order to maintain social distancing. Small-scale activities like parent-teacher conferences may take place over the phone or other electronic means. Other extracurricular activities will be cancelled unless the activity can be conducted in compliance with the protocols in this document.

### **Specialized Classes**

Some classes, such as science labs, choir, band, PE, and others, may require alternative lesson plans to limit contact and the sharing of supplies, and to reduce the spread of respiratory droplets.

## **STEP 2 PROTOCOLS: EMPLOYEES**

Step 2 protocols are established based on community monitoring that reveals low levels of community spread of COVID-19. These practices are put in place as part of a general scale-up of operations.

### **Exposure Assessment and PPE**

Prior to allowing employees to report to work, district administration, in conjunction with relevant site supervisors and department supervisors, will assess each work site to determine whether PPE is necessary for specific positions in order to limit the spread of COVID-19. If a position is determined to require PPE, WUSD will provide the PPE to staff at no cost and train staff on its correct use.

### **Visitors to School**

Nonessential visitors and volunteers will be limited at school for the duration of the COVID19 crisis.

### **Daily Screening**

Employees will not be allowed to work onsite if they exhibit any of the following symptoms:

- fever of 100.4 and higher or chills,
- shortness of breath or difficulty breathing,
- muscle aches,
- sore throat,
- headache,
- fatigue,

- congestion or runny nose,
- cough,
- vomiting,
- diarrhea, or
- new loss of taste or smell.

Additionally:

Each employee's temperature will be taken by a designated staff member, wearing appropriate PPE, when employees report to work. A non-contact thermometer will be used.

If an employee's temperature is at or above 100.4, the employee will be sent home. Employees will be informed that they must self-report any symptoms that develop during the day, and must remain home if they exhibit any of the symptoms identified above while away from school.

The designated on-site staff member keep a daily checklist of employees who have affirmed that they were symptom-free upon arrival. Maintain these records in a separate file marked "Confidential."

### **Handwashing**

Employees will be required to wash their hands with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol at the following times, at minimum:

- upon arrival at school;
- after being outside for student physical activity;
- before and after lunch;
- after sneezing, coughing, or blowing nose; and
- after physical contact with other staff or students.

### **Enhanced Social Distancing**

Employees will be required to maintain a distance of at least 6 feet between individuals at all times, unless this is not physically possible or, for a student's safety, less space is required. If a situation arises that requires a staff member to touch a student or another staff member (for instance, if a student requires toileting help, is having a physical emergency, or requires a two-person restraint), the staff member will resume social distancing as soon as safely possible, wash their hands, and disinfect any surfaces they touched.

## **Face Coverings**

See the “Use of Face Coverings” section on page 9.

Staff members will be required to wear face coverings during interaction with students or other staff unless they cannot do so for health reasons. In these cases, employees will be provided with face shields. Teachers will be provided with face shields.

Staff members may remove face coverings if the staff member is alone in his/her work area. The face covering must be worn again, and the work area disinfected, before students or other staff arrive. Unless a health condition prevents it, janitorial staff must wear cloth face coverings and/or other personal protective equipment (as available and appropriate) while cleaning and disinfecting the schools.

Note: Wearing face coverings does not replace the need to maintain social distancing of at least 6 feet whenever possible.

The Superintendent may make exceptions to the requirement to wear a cloth face covering while keeping in mind the health and safety of everyone involved.

## **Cleaning and Disinfecting**

Prior to reopening, inspection of all sinks, facets, and water systems will be completed to ensure that they are functioning and safe for use after the prolonged shutdown. Ventilation systems and air filters will be inspected to ensure the greatest possible fresh air flow is occurring on every campus.

Additional custodial staff will be hired provide for daily cleaning, disinfecting and security needs of all campuses. Frequently touched surfaces in work areas, such as door handles, sink handles, desks, and learning tools will be disinfected multiple times each day. Playground, sports equipment, and any other shared items (if they are being used) must be cleaned between uses by groups of students. Custodial staff schedules will allow for increased cleaning of surfaces and bathrooms throughout the day. Additional resources that assist with sanitization protocols (such as fogging or misting tools) will be purchased.

All staff will be informed that they are expected to clean and disinfect workspaces when they arrive at work and just before leaving work.

## **STEP 3 PROTOCOLS: STUDENTS ON CAMPUS**

Whiteriver Unified School District  
Return to Learning Plan  
Board Adopted: 07-22-20  
Updated 8-25-20

## Introduction

Step 3 protocols are established based on community monitoring that reveals even lower levels of community spread of COVID-19 than in Step 2. Local health officials will be consulted for guidance. When a district, or a specific school site, progresses to Step 3, the Step 2 protocols should remain in place with the following exceptions:

## Social Distancing

### Introduction

Social distancing protocols may be relaxed somewhat during Step 3. Staff members will continue to educate and regularly remind students to maintain 6 feet of distance between individuals at all times possible. However, increased social interaction among classes is permissible.

Note: Nonessential visitors and volunteers at school may continue to be prohibited or may be limited in number and must agree to adhere to the district's social distancing and other protocols.

### Drop-off/Pick-up procedures

If schools adopted staggered drop-off and pick-up times with specific time slots assigned to families, they may revert to a single drop-off/pick-up window for all families. If schools adopted a drop-off/pick-up process with a prohibition on parents getting out of the car, this may be lifted.

### Communal spaces

*Playgrounds.* Classes will have staggered use time on playground equipment. No more than two classes will be assigned to a specific time slot, and disinfection of the playground equipment will occur between uses.

*Lunch rooms.* There will be a gradual transition to more use of the multipurpose room/cafeteria during lunch, with increased safety measures, including the following:

- Mark tables in the multipurpose room to indicate where students may sit.
- Assign students to a specific seat with a minimum of 3 feet between marked seats.
- Limit multipurpose room seating to the number of assigned seats.
- If students line up for lunch service, permit only one class to line up at a time, and place markings on the floor to indicate where students should stand to



maintain social distancing. Alternatively, staff may serve food to each student at their assigned seat.

- Serve lunches on disposable food service items (trays, plates, etc.), if possible. If disposable items cannot be used, have food service staff collect items wearing gloves.
- Prohibit students from sharing lunch items with one another.

### **Trips and Activities**

Field trips that can comply with the protocols in this document will be permitted *only* if the area to be visited is at a Step 3 of community mitigation. Teachers will continue to use virtual learning opportunities (such as virtual tours of museums) to enhance students' educational experiences.

School assemblies may be held in staggered groups to ensure that social distancing protocols can be maintained. Unless social distancing can be maintained with all students in the same room, school-wide assemblies must be held virtually with student groups remaining in their classrooms.

### **PROCEDURES FOR COVID-19 SYMPTOMS OR A POSITIVE TEST EMPLOYEE**

If a person becomes sick with COVID-19 symptoms or reports a positive COVID-19 test, the procedures listed below will be followed:

1. If staff have symptoms of or have tested positive for COVID19, they must stay home and immediately report the situation to their immediate supervisor **ONLY**. Confidentiality must be maintained to the greatest extent possible. Staff will need to provide information about their presence at any district facility during the 48 hours prior to the onset of symptoms and/or positive test.
2. Staff must also immediately inform their supervisor if they have been ordered to self-quarantine by health authorities or their doctor due to exposure to someone else with symptoms or a positive test. They should not report to work/school. Again, this information must be kept confidential.
3. If an employee develops COVID-19 symptoms at work, separate the employee from all other students, staff, or visitors, then make arrangements to send the employee home in a safe manner. If the employee is able to self-transport, have the employee leave the site. If the employee is not able to safely self-transport, contact a family member, friend, or other method of transport to get the employee home or to a health care provider. If the employee appears to be in medical distress, call 911.

4. Begin to determine which other employees or students have had “close contact” with the individual so as to make informed decisions regarding next steps. The Center for Disease Control defines “close contact” as someone who was within six (6) feet of an infected person for at least 15 minutes starting from two (2) days before illness onset (or, for asymptomatic patients, two (2) days prior to specimen collection) until the time the patient is isolated.
5. Investigate the matter by telephonically interviewing the individual. Suggested interview questions:
  - a. Have you been diagnosed with COVID-19?
  - b. Do you have symptoms of COVID-19 as listed by the CDC? If yes, for how long? (Limit questions to COVID-19 and not other health conditions.)
  - c. Have you been in close contact with an individual diagnosed, exposed to or who has symptoms of COVID-19?
  - d. Who at the district have you had close contact within the two days prior to symptoms or specimen collection?
  - e. What district sites have you been to within the two days prior to symptoms or specimen collection?
  - f. Have you had any physical contact with products that were distributed to district constituents (e.g., lunches, learning packets, etc.)?  
(An employee must not be discriminated against for having COVID-19 or refusing to answer questions regarding their possible exposure, diagnosis, or symptoms of COVID-19. If the individual is unwilling or unable to participate in the interview, operate under the presumption that there is a possible COVID-19 exposure.)
6. Assess possible exposure
  - a. Assess who may have had contact with the individual in the two days prior to symptoms or specimen collection; and
  - b. Assess which district sites may need to be sanitized or temporarily closed. If it has been confirmed that an infected individual was in the workplace, close off any areas that were exposed for a prolonged period. Wait 24 hours before cleaning and disinfecting those areas. During that time, if feasible, open windows or outside doors to increase air circulation. After 24 hours, thoroughly clean and disinfect all surfaces in the area, per CDC guidelines. (See appendix B)
7. Determine whether other employees or students may have been exposed to the symptomatic individual within 6 feet and for a prolonged period of time (typically longer than 15 minutes). If so, notify those individuals (or, in the case of students, their parents) of the potential exposure. DO NOT disclose the name of the individual who has become sick. Notification should recommend that exposed individuals monitor their health closely, contact their health care provider if possible, and self-quarantine if any symptoms develop. (See Appendix C)

8. Determine who should receive notice of potential COVID-19 exposure.
9. All information collected during the interview should be maintained in a separate employee medical file and not in the employee's personnel file.
10. The district may assign the individual telework if that is a possibility. If the employee is unable to telework, they may qualify for paid emergency sick leave under the Families First Coronavirus Response Act ("FFCRA"). (See Appendix D)
11. The district is obligated to record cases of COVID-19 as an occupational illness pursuant to 29 CFR Part 1904. OSHA has released revised guidance on May 19, 2020 regarding the limited investigation that employers must conduct in order to make a reasonable determination of whether the illness is work related. The district is not required to undertake extensive medical inquiry but must ask the employee how he or she believes they contracted COVID-19, discuss outside activities, and review work environment. (See Appendix E)
12. Employees or students who have developed COVID-19 symptoms or had a positive COVID-19 test may not return to the site until either of the following two scenarios has occurred:

Scenario one

- At least 3 days (72 hours) have passed since recovery, which is defined as:
  - (a) resolution of fever without the use of fever-reducing medications; and
  - (b) improvement in respiratory symptoms (e.g., cough, shortness of breath); and
- At least 10 days have passed since the first symptoms emerged.

**OR**

Scenario two

- There has been a resolution of fever without the use of fever-reducing medications; and
- There has been improvement in respiratory symptoms (e.g., cough, shortness of breath); and
- The individual has received negative results of an FDA emergency-use-authorized COVID-19 molecular assay for detection of the virus that causes COVID-19 from at least two consecutive respiratory specimens collected  $\geq 24$  hours apart (total of two negative specimens).

## **PROCEDURES FOR COVID-19 SYMPTOMS OR A POSITIVE TEST STUDENT OR PARENT**

1. If a student develops COVID-19 symptoms at school, follow protocol re: isolation and transport of student, if at school. If a student develops COVID-19 symptoms at school, separate the student from all other students and staff, with the exception of one staff member to supervise the student. This staff member will wear PPE or a cloth face covering and will maintain a distance of at least 6 feet from the students at all times, unless there is an emergency. Staff will immediately notify a parent or emergency contact to pick up the student and will call 911 if the student appears to be in medical distress.
2. Attempt to communicate with the parent. The district may call the parent to discuss possible exposure. If they are not reachable or decline to discuss the matter, cease all investigations and operate under the presumption that there is a possible COVID-19 exposure.
3. Assess possible exposure.
  - a. Assess who may have had contact with the individual or their family in the two days prior to symptom onset; and
  - b. Assess which district sites may need to be sanitized or temporarily closed. See Industrial Hygiene section for more information.
4. Determine who should receive notice of potential COVID-19 exposure.

### **REPORTING AND NOTIFICATION**

The Americans with Disabilities Act (“ADA”), Family Educational Rights and Privacy Act (“FERPA”), and the Health Insurance Portability and Accountability Act (“HIPAA”) should be considered in any district disclosure of possible COVID-19 infection. In each instance, a district should maintain all information as a confidential medical record and should only disclose relevant non-identifying information to those individuals that the district is permitted to provide notice.

### **MANDATORY REPORTING**

According to the Arizona Attorney General, a school district is not required to report a possible COVID-19 infection to health authorities under A.R.S. § 36-621.2 A district may report a case of COVID-19 to the appropriate board of health or the Arizona Department of Health. In doing so, the district should evaluate whether the disclosure falls under the emergency health and safety exception under FERPA.3

The Arizona Department of Health Services (ADHS) has recommended that districts report know cases to the county health department. ADHS has also established a COVID-19 hotline at 1-844-542-8201.

### **NOTIFYING CO-WORKERS AND THE PUBLIC**

If an employer receives notification that an employee, contractor, volunteer, or other individual working on a district's site has a confirmed COVID-19 infection, the CDC recommends that the employer "inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain the confidentiality of the affected individual as required by the Americans with Disabilities Act (ADA). The fellow employees should then self-monitor for symptoms (i.e., fever, cough, or shortness of breath)."

Similarly, a district may notify its community that they may have been exposed to COVID-19 through their interactions with the district. The same procedure can apply for a contractor, volunteer, or other individual associated with a district. The district must maintain confidentiality at all times, and is prohibited from providing any information that would identify the affected individual. If the individual involved is a subcontractor or employed by another entity, the district should also inform their employer immediately.

### **Notification if the Individual is a Student or Parent**

A student's possible exposure to COVID-19 should be treated as a student record subject to FERPA. Specifically, the Arizona Attorney General suggests "given the current health emergency, [educational institutions] should apply the FERPA/HIPAA exceptions and disclose sufficient information related to positive COVID-19 cases so those potentially affected students, staff, visitors, etc. can self-monitor and potentially self-quarantine. At a minimum, [educational institutions] should disclose information identifying the [district sites] frequented by the infected student during the incubation period and/or while exhibiting symptoms . . . Further, warning other students, parents of students, school staff, and others about potential contact with an affected student is appropriate when, as here, those persons' knowledge is "necessary to protect the health or safety of the student or other individuals."

Therefore, if a student has suspected COVID-19 exposure, it is appropriate to notify "appropriate parties" of possible exposure. **The media is not an "appropriate party.** The district may also provide notice to appropriate parties if a parent, sibling, or other member of the student's household has a suspected COVID-19 exposure so they may self-monitor and self-quarantine.

Notifications must not disclose any personally identifiable information about the individual unless a FERPA exception applies.

#### Notification Basics

- The notice must not contain personally identifying information;
- The notice should only include non-identifying information that is relevant to allow those with potential exposure to self-monitor and self-quarantine;
- Only provide the notice to "appropriate parties;"
- The district may inform appropriate health officials as long as it complies with

- applicable privacy laws;
- The notification should include information about the district sites frequented by the individual during the incubation period and while exhibiting symptoms;
- The notification should include information on what the district is doing in regards to industrial hygiene, including whether the site will be closed and for how long; and
- The notification should encourage those individuals that may have been exposed to COVID-19 to self-monitor for symptoms and to self-quarantine if appropriate.

### **Removal from the Workplace or School Site**

Districts will need to continue to make individual determinations about whether to require students or employees to quarantine after a workplace exposure. In general, districts should assess who had close contact with the infected individual (exposure for more than 15 minutes two (2) days prior to onset of symptoms or collection of specimen). The CDC has published guidance for what to do if the determination is made to continue to allow critical infrastructure employees to work after a potential exposure. (See Appendix F)

Policy GBGCB grants the Superintendent the authority “to take reasonable and lawful measures to protect students and staff member from the transmission of communicable diseases.” This includes requiring appropriate industrial hygiene practices before and following possible COVID-19 exposure. OSHA developed specific guidance, which includes:

- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment;
- Promote frequent and thorough hand washing;
- Provide soap and/or alcohol-based (at least 60%) hand sanitizer, tissues, disposable towels for workers to clean their work surfaces, and trash receptacles;
- Require social distancing at worksites;
- Assess whether personal protective equipment (PPE) is appropriate for individuals working onsite;
- Encourage “respiratory etiquette” which includes covering coughs and sneezes;
- Post mandatory reminders for workers to follow hygiene protocols;
- Restrict the number of people entering a previously contaminated area;
- Where appropriate, limit access to the worksite, or restrict access to only certain workplace areas;
- Consider strategies to minimize face-to-face contact (e.g., drive through windows, staggered work shifts, etc.);
- Discourage workers from using other workers’ phones, desks, offices, or other work tools and equipment;
- Isolate individuals who have had close contact with an individual who has been diagnosed, exposed to, or has symptoms of COVID-19; and

- Temporarily close and sanitize a previously contaminated area. Cleaning chemicals should include Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens which are expected to be effective against COVID-19.

Appendix A: Sample Phase 2 Choice form



**WHITERIVER ELEMENTARY SCHOOL**

P.O. Box 190  
WHITERIVER, ARIZONA 85941

PHONE: (928) 358-5660

Ms. BONNIE KASEY  
5661  
PRINCIPAL

FAX: (928) 358-

WES Mission Statement: Offering a safe learning environment that guides all students to reach their highest potential.

September 3, 2020

Dear Whiteriver Elementary School Parents,

Please select which Phase 2 option you would like to register your child for when we are able to implement the Phase 2 plan. You may drop this card off at Whiteriver Elementary School, or call the school at 928-358-5660 Mon. through Thursday between the hours of 6:00 am to 4:00 pm. **Please respond by July 30<sup>th</sup>**. Students

Name(s): \_\_\_\_\_

Parent/Guardians Name: \_\_\_\_\_

Phase 2 Option:

\_\_\_\_\_ Option 1: On-line Curriculum Monday through Friday (student learning from home.)

\_\_\_\_\_ Option 2: Socially distanced on campus:

Pre-K to 3 <sup>rd</sup> grade:	4 <sup>th</sup> -6 <sup>th</sup> Grade:
Small class sizes (10-12 students) Schedule: Monday-Thursday	On campus (at CDJH) 2 days a week, on-line 3 days Small class sizes (10-12 students)

Whiteriver Unified School District  
Return to Learning Plan  
Board Adopted: 07-22-20  
Updated 8-25-20

Friday in-person intervention only for students in need	
---	--

WES Vision Statement: Empowering all students to value culture, community, and learning to prepare for a successful future.

Appendix B CDC Guidance for Cleaning and Disinfecting

**GUIDANCE FOR CLEANING & DISINFECTING**  
PUBLIC SPACES, WORKPLACES, BUSINESSES, SCHOOLS, AND HOMES

QR CODE: SCAN HERE FOR MORE INFORMATION

- 1 DEVELOP YOUR PLAN**
  - DETERMINE WHAT NEEDS TO BE CLEANED:** Areas unoccupied for 7 or more days need only routine cleaning. Maintain existing cleaning practices for outdoor areas.
  - DETERMINE HOW AREAS WILL BE DISINFECTED:** Consider the type of surface and how often the surface is touched. Prioritize disinfecting frequently touched surfaces.
  - CONSIDER THE RESOURCES AND EQUIPMENT NEEDED:** Keep in mind the availability of cleaning products and personal protective equipment (PPE) appropriate for cleaners and disinfectants.

Follow guidance from state, tribal, local, and territorial authorities.
- 2 IMPLEMENT**
  - CLEAN VISIBLY DIRTY SURFACES WITH SOAP AND WATER** prior to disinfection.
  - USE THE APPROPRIATE CLEANING OR DISINFECTANT PRODUCT.** Use an EPA-approved disinfectant against COVID-19, and read the label to make sure it meets your needs.
  - ALWAYS FOLLOW THE DIRECTIONS ON THE LABEL.** The label will include safety information and application instructions. Keep disinfectants out of the reach of children.
- 3 MAINTAIN AND REVISE**
  - CONTINUE ROUTINE CLEANING AND DISINFECTION:** Continue or revise your plan based upon appropriate disinfectant and PPE availability. Dirty surfaces should be cleaned with soap and water prior to disinfection. Routinely disinfect frequently touched surfaces at least daily.
  - MAINTAIN SAFE PRACTICES** such as frequent handwashing, using cloth face coverings, and staying home if you are sick.
  - CONTINUE PRACTICES THAT REDUCE THE POTENTIAL FOR EXPOSURE.** Maintain social distancing, staying six feet away from others. Reduce sharing of common spaces and frequently touched objects.

For more information, please visit [CORONAVIRUS.GOV](https://www.cdc.gov/coronavirus/2019-ncov/faq.html)

© Coronavirus (COVID-19) 2020-04-09





## Appendix C Notification Template

Remember the notification cannot disclose the employee's name unless the employee has given permission to disclose. If you are going to notify other employees of possible exposure, you can say things like:

We have learned that an employee (or employee's family member) has tested positive for COVID-19 and that you may have interacted with this employee during the last 14 days. While we have to maintain the confidentiality of the identity of this person, we wanted to make you aware.

If you develop symptoms, receive a positive COVID-19 test result or are advised by your healthcare provider to isolate or self-quarantine, please let us know so we can determine whether we need to notify others of possible exposure.

You can provide additional details if it seems appropriate but be careful to balance the interest in giving important details to protect others with the interest of keeping the employee's identity confidential.

## Appendix D Families First Coronavirus Response Act ("FFCRA")

Whiteriver Unified School District  
Return to Learning Plan  
Board Adopted: 07-22-20  
Updated 8-25-20

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19. The Department of Labor's (Department) Wage and Hour Division (WHD) administers and enforces the new law's paid leave requirements. These provisions will apply from the effective date through December 31, 2020.

Generally, the Act provides that employees of covered employers are eligible for:

- Two weeks (up to 80 hours) of paid sick leave at the employee's regular rate of pay where the employee is unable to work because the employee is quarantined (pursuant to Federal, State, or local government order or advice of a health care provider), and/or experiencing COVID-19 symptoms and seeking a medical diagnosis; or
- Two weeks (up to 80 hours) of paid sick leave at two-thirds the employee's regular rate of pay because the employee is unable to work because of a bona fide need to care for an individual subject to quarantine (pursuant to Federal, State, or local government order or advice of a health care provider), or to care for a child (under 18 years of age) whose school or child care provider is closed or unavailable for reasons related to COVID-19, and/or the employee is experiencing a substantially similar condition as specified by the Secretary of Health and Human Services, in consultation with the Secretaries of the Treasury and Labor; and
- Up to an additional 10 weeks of paid expanded family and medical leave at two-thirds the employee's regular rate of pay where an employee, who has been employed for at least 30 calendar days, is unable to work due to a bona fide need for leave to care for a child whose school or child care provider is closed or unavailable for reasons related to COVID-19.

**Covered Employers:** The paid sick leave and expanded family and medical leave provisions of the FFCRA apply to certain public employers, and private employers with fewer than 500 employees. Most employees of the federal government are covered by Title II of the Family and Medical Leave Act, which was not amended by this Act, and are therefore not covered by the expanded family and medical leave provisions of the FFCRA. However, federal employees covered by Title II of the Family and Medical Leave Act are covered by the paid sick leave provision.

Small businesses with fewer than 50 employees may qualify for exemption from the requirement to provide leave due to school closings or child care unavailability if the leave requirements would jeopardize the viability of the business as a going concern.

**Eligible Employees:** All employees of covered employers are eligible for two weeks of paid sick time for specified reasons related to COVID-19. Employees employed for at least 30 days are eligible for up to an additional 10 weeks of paid family leave to care for a child under certain circumstances related to COVID-19.

**Notice:** Where leave is foreseeable, an employee should provide notice of leave to the employer as is practicable. After the first workday of paid sick time, an employer may require employees to follow reasonable notice procedures in order to continue receiving paid sick time.

### Qualifying Reasons for Leave:

Under the FFCRA, an employee qualifies for paid sick time if the employee is unable to work (or unable to telework) due to a need for leave because the employee:

1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. has been advised by a health care provider to self-quarantine related to COVID-19;
3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;
4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);
5. is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19; or
6. is experiencing any other substantially-similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretaries of Labor and Treasury.

Under the FFCRA, an employee qualifies for expanded family leave if the employee is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19.

### Duration of Leave:

For reasons (1)-(4) and (6): A full-time employee is eligible for 80 hours of leave, and a part-time employee is eligible for the number of hours of leave that the employee works on average over a two-week period.

For reason (5): A full-time employee is eligible for up to 12 weeks of leave (two weeks of paid sick leave followed by up to 10 weeks of paid expanded family & medical leave) at 40 hours a week, and a part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

### Calculation of Pay:

For leave reasons (1), (2), or (3): employees taking leave are entitled to pay at either their regular rate or the applicable minimum wage, whichever is higher, up to \$511 per day and \$5,110 in the aggregate (over a 2-week period).

For leave reasons (4) or (6): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$2,000 in the aggregate (over a 2-week period).

For leave reason (5): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$12,000 in the aggregate (over a 12-week period).

## Appendix E OSHA Guidance

May 19, 2020

MEMORANDUM FOR: REGIONAL ADMINISTRATORS STATE PLAN DESIGNEES

Whiteriver Unified School District  
Return to Learning Plan  
Board Adopted: 07-22-20  
Updated 8-25-20

THROUGH: AMANDA EDENS Deputy Assistant Secretary

FROM: LEE ANNE JILLINGS, Acting Director Directorate of Technical Support and Emergency Management

PATRICK J. KAPUST, Acting Director Directorate of Enforcement Programs

SUBJECT: Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19)

This memorandum provides updated interim guidance to Compliance Safety and Health Officers (CSHOs) for enforcing the requirements of 29 CFR Part 1904 with respect to the recording of occupational illnesses, specifically cases of COVID-19. On May 26, 2020, the previous memorandum on this topic<sup>[1]</sup> will be rescinded, and this new memorandum will go into and remain in effect until further notice. This guidance is intended to be time-limited to the current COVID-19 public health crisis. Please frequently check OSHA's webpage at [www.osha.gov/coronavirus](http://www.osha.gov/coronavirus) for updates.

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus employers are responsible for recording cases of COVID-19, if:

The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC);

[2] The case is work-related as defined by 29 CFR § 1904.5;

[3] and The case involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.

[4] Confirmed cases of COVID-19 have now been found in nearly all parts of the country, and outbreaks among workers in industries other than healthcare, emergency response, or correctional institutions have been identified. As transmission and prevention of infection have become better understood, both the government and the private sector have taken rapid and evolving steps to slow the virus's spread, protect employees, and adapt to new ways of doing business. As the virus's spread now slows in certain areas of the country, states are taking steps to reopen their economies and workers are returning to their workplaces. All these facts—incidence, adaptation, and the return of the workforce—indicate that employers should be taking action to determine whether employee COVID-19 illnesses are work-related and thus recordable. Given the nature of the disease and ubiquity of community spread, however, in many instances it remains difficult to determine whether a COVID-19 illness is work-related, especially when an employee has experienced potential exposure both in and out of the workplace.

In light of these considerations, OSHA is exercising its enforcement discretion in order to provide certainty to employers and workers. Accordingly, until further notice, OSHA will enforce the recordkeeping requirements of 29 CFR 1904 for employee COVID-19 illnesses for all employers according to the guidelines below. Recording a COVID-19 illness does not, of itself, mean that the employer has violated any OSHA standard. And pursuant to existing regulations, employers with 10 or fewer employees and certain employers in low hazard industries have no recording obligations; they need only report work-related COVID-19 illnesses that result in a fatality or an employee's in-patient hospitalization, amputation, or loss of an eye.

[5] Because of the difficulty with determining work-relatedness, OSHA is exercising enforcement discretion to assess employers' efforts in making work-related determinations.

In determining whether an employer has complied with this obligation and made a reasonable determination of work-relatedness, CSHOs should apply the following considerations:

The reasonableness of the employer's investigation into work-relatedness. Employers, especially small employers, should not be expected to undertake extensive medical inquiries, given employee privacy concerns and most employers' lack of expertise in this area. It is sufficient in most circumstances for the employer, when it learns of an employee's COVID-19 illness, (1) to ask the employee how he believes he contracted the COVID-19 illness; (2) while respecting employee privacy, discuss with the employee his work and out-of-work activities that may have led to the COVID-19 illness; and (3) review the employee's work environment for potential SARS-CoV-2 exposure. The review in (3) should be informed by any other instances of workers in that environment contracting COVID-19 illness. The evidence available to the employer. The evidence that a COVID-19 illness was work-related should be considered based on the information reasonably available to the employer at the time it made its work-relatedness determination. If the employer later learns more information related to an employee's COVID-19 illness, then that information should be taken into account as well in determining whether an employer made a reasonable work-relatedness determination.

The evidence that a COVID-19 illness was contracted at work. CSHOs should take into account all reasonably available evidence, in the manner described above, to determine whether an employer has complied with its recording obligation. This cannot be reduced to a ready formula, but certain types of evidence may weigh in favor of or against work-relatedness. For instance:

COVID-19 illnesses are likely work-related when several cases develop among workers who work closely together and there is no alternative explanation.

An employee's COVID-19 illness is likely work-related if it is contracted shortly after lengthy, close exposure to a particular customer or coworker who has a confirmed case of COVID-19 and there is no alternative explanation.

An employee's COVID-19 illness is likely work-related if his job duties include having frequent, close exposure to the general public in a locality with ongoing community transmission and there is no alternative explanation.

An employee's COVID-19 illness is likely not work-related if she is the only worker to contract COVID-19 in her vicinity and her job duties do not include having frequent contact with the general public, regardless of the rate of community spread.

An employee's COVID-19 illness is likely not work-related if he, outside the workplace, closely and frequently associates with someone (e.g., a family member, significant other, or close friend) who (1) has COVID-19; (2) is not a coworker, and (3) exposes the employee during the period in which the individual is likely infectious.

CSHOs should give due weight to any evidence of causation, pertaining to the employee illness, at issue provided by medical providers, public health authorities, or the employee herself.

If, after the reasonable and good faith inquiry described above, the employer cannot determine whether it is more likely than not that exposure in the workplace played a causal role with respect to a particular case of COVID-19, the employer does not need to record that COVID-19 illness. In all events, it is important as a matter of worker health and safety, as well as public health, for an employer to examine COVID-19 cases among workers and respond appropriately to protect workers, regardless of whether a case is ultimately determined to be work-related.

CSHOs will generally refer to CPL 02-00-135, Recordkeeping Policies and Procedures Manual (Dec. 30, 2004),<sup>[6]</sup> and CPL 02-00-163, Field Operations Manual (Sept. 13, 2019),<sup>[7]</sup> Chapters 3 and 6, as applicable. The following additional specific enforcement guidance is provided for CSHOs:

COVID-19 is a respiratory illness and should be coded as such on the OSHA Form 300. Because this is an illness, if an employee voluntarily requests that his or her name not be entered on the log, the employer must comply as specified under 29 CFR § 1904.29(b)(7)(vi).

If you have any questions regarding this policy, please contact Elizabeth Grossman, Director of the Office of Statistical Analysis, at (202) 693-2225.

## Appendix F CDC Guidance Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19

To ensure continuity of operations of essential functions, CDC advises that critical infrastructure workers may be permitted to continue work following potential exposure to COVID-19, provided they remain asymptomatic and additional precautions are implemented to protect them and the community.

A potential exposure means being a household contact or having close contact within 6 feet of an individual with confirmed or suspected COVID-19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic.

Critical Infrastructure workers who have had an exposure but remain asymptomatic should adhere to the following practices prior to and during their work shift:

**Pre-Screen:** Employers should measure the employee's temperature and assess symptoms prior to them starting work. Ideally, temperature checks should happen before the individual enters the facility.

**Regular Monitoring:** As long as the employee doesn't have a temperature or symptoms, they should self-monitor under the supervision of their employer's occupational health program.

**Wear a Mask:** The employee should wear a face mask at all times while in the workplace for 14 days after last exposure. Employers can issue facemasks or can approve employees' supplied cloth face coverings in the event of shortages.

**Social Distance:** The employee should maintain 6 feet and practice social distancing as work duties permit in the workplace.

**Disinfect and Clean work spaces:** Clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment routinely.

If the employee becomes sick during the day, they should be sent home immediately.

Surfaces in their workspace should be cleaned and disinfected. Information on persons who had contact with the ill employee during the time the employee had symptoms and 2 days prior to symptoms should be compiled. Others at the facility with close contact within 6 feet of the employee during this time would be considered exposed.

### INTERIM GUIDANCE

*This interim guidance pertains to critical infrastructure workers, including personnel in 16 different sectors of work including:*

- Federal, state, & local law enforcement
- 911 call center employees
- Fusion Center employees
- Hazardous material responders from government and the private sector
- Janitorial staff and other custodial staff
- Workers – including contracted vendors – in food and agriculture, critical manufacturing, informational technology, transportation, energy and government facilities

### ADDITIONAL CONSIDERATIONS

- Employees should not share headsets or other objects that are near mouth or nose.
- Employers should increase the frequency of cleaning commonly touched surfaces.
- Employees and employers should consider pilot testing the use of face masks to ensure they do not interfere with work assignments.
- Employers should work with facility maintenance staff to increase air exchanges in room.
- Employees should physically distance when they take breaks together. Stagger breaks and don't congregate in the break room, and don't share food or utensils.