

The Rockland BOCES Public Health Continuation of Operations Plan

2021



ROCKLAND BOCES
ROOTED IN THE COMMUNITY

INTRODUCTION

This plan has been developed in accordance with New York State Labor Law Section 27-c and New York State Education Law Section 2801-a.

This plan has been developed with the input of BOCES Administrative and Supervisory Association (BASA), Civil Service Employees Association (CSEA), and BOCES Staff Association (BSA), as required by the New York State Labor Law.

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PURPOSE, SCOPE, AND PLANNING

Purpose

This plan has been developed in accordance with the New York State Labor Law Section 27-c and New York State Education Law Section 2801-a. These laws were amended by Chapter 168 of the Laws of 2020 signed by the Governor of New York State on September 7, 2020, requiring public employers to adopt a plan for operations in the event of a declared Public Health Emergency involving a communicable disease. The plan includes the identification of essential positions, facilitation of remote work for non-essential positions, provision of personal protective equipment, and protocols for supporting contact tracing.

Scope

This plan was developed exclusively for and is applicable to Rockland BOCES. This plan is pertinent to a declared Public Health Emergency in the State of New York which may impact our operations; and it is in the interest of the safety of our employees and contractors, and the continuity of our operations that we have promulgated this plan.

Planning Assumptions

This plan was developed based on information, best practices, and guidance available as of the date of publication. The plan was developed to largely reflect the circumstances of the current COVID-19 pandemic but may also be applicable to other infectious disease outbreaks.

The following assumptions have been made in the development of this plan:

- The health and safety of our employees and contractors, and their families, is of utmost importance.
- The circumstances of a Public Health Emergency may directly impact our own operations.
- Impacts of a Public Health Emergency will take time for us to respond to, with appropriate safety measures put into place and adjustments made to operations to maximize safety.
- The public and our constituency expect us to maintain a level of mission essential operations.
- Supply chains, particularly those for personal protective equipment (PPE) and cleaning supplies, may be heavily impacted, resulting in considerable delays in procurement.
- The operations of other entities, including the private sector (vendors, contractors, etc.), non-profit organizations, and other governmental agencies and services may also be impacted due to the Public Health Emergency, causing delays or other disruptions in their services.
- Emergency measures and operational changes may need to be adjusted based upon the specific circumstances and impacts of the Public Health Emergency, as well as guidance and direction from public health officials and the Governor.
- Labor Law Section 27-c defines 'essential employee' as a public employee or contractor that is required to be physically present at a work site to perform his/her job.
- Labor Law Section 27-c defines 'non-essential employee' as a public employee or contractor that is not required to be physically present at a work site to perform his/her job.

CONCEPT OF OPERATIONS

The District Superintendent/CEO and the Chief Operating Officer/Deputy District Superintendent of Rockland BOCES, or designee, hold the authority to execute and direct the implementation of this plan. Implementation, monitoring of operations, and adjustments to plan implementation may be supported by additional personnel, at the discretion of the District Superintendent/CEO and the Chief Operating Officer/Deputy District Superintendent.

Upon the determination of implementing this plan, all employees and contractors of Rockland BOCES shall be notified by official announcement (email, mail, website, or phone) with details provided as possible and necessary, with additional information and updates provided on a regular basis. Other interested parties, such as vendors, will be notified by phone and/or email as necessary. Rockland BOCES Communications Department will maintain communications with the public and constituents as needed throughout the implementation of this plan.

District Superintendent/CEO and the Chief Operating Officer/Deputy District Superintendent of Rockland BOCES, or designee, will maintain awareness of information, direction, and guidance from public health officials and the Governor's office, directing the implementation of changes as necessary.

Upon resolution of the Public Health Emergency, the District Superintendent/CEO and the Chief Operating Officer/Deputy District Superintendent of Rockland BOCES, or designee, will direct the resumption of normal operations or operations with modifications as necessary.

Essential Positions

Rockland BOCES does not have staff who are considered essential. However, there are a number of positions that are necessary to assist in the response to a pandemic or communicable disease outbreak. Positions necessary for Rockland BOCES' operations during a state-ordered reduction of in-person workforce include:

Title	Justification
District Superintendent/CEO	Co-Individual in charge of operation, sets objectives and priorities and has overall oversight of the Pandemic Response Planning.
Chief Operating Officer/Deputy District Superintendent	Co-Individual in charge of operation, sets objectives and priorities and has overall oversight of the Pandemic Response Planning.
Asst Superintendent for Career & Admin Services	Conducts Career Services operations to carry out the plan and directs all related resources.
Assistant Superintendent for Student Services	Conducts Student Services operations to carry out the plan and directs all related resources.
Executive Director of Business and Operations/ Pandemic Safety Officer	Conducts tactical operations to carry out the plan and directs all resources. Responsibilities include continuous compliance that allows for operational issues to be resolved.
Science and Health & Safety Program Administrator	Direct support to the Pandemic Safety Officer for contact tracing and pandemic response.

Executive Director of Human Resources	Conducts Human Resources operations to carry out the plan and directs all related resources.
Facilities Manager	Provides coordination of custodial and maintenance staff to meet Pandemic Response Plan needs.
Custodial/Maintenance Staff	This group is needed to maintain the cleanliness and continue functioning of the buildings and grounds.
Director of Communications & Governmental Relations	Point of contact for the media and other organizations seeking information.
Rockland BOCES' Medical Director	Provides medical support to assist with testing requirements, reporting and coordination with the Department of Health and Rockland BOCES.
Director of Business	Provides support for purchasing, budget management, and payroll.
Business Office Staff	Accounting, payroll, purchasing where necessary to ensure the continued operations of Rockland BOCES.
Assistant Director of Transportation	Coordinates all transportation planning necessary to carry out the plan.
Bus Drivers	Transports students in the event they are attending in person instruction and assist with food and/or technology distribution to students.
Food Services	Prepares and distributes meals to students. Necessary to coordinate food services during school closure.
Technology	Coordinates IT resources, continued operation of the network, to ensure remote learning and work capabilities.
Health Office Staff	Staff as deemed necessary to assist with testing requirements, reporting and contact tracing.
Human Resources Staff	Coordinates mail operations relative to the operations of Rockland BOCES.

REDUCING RISK THROUGH REMOTE WORK AND STAGGERED SHIFTS

Through assigning certain staff to work remotely and by staggering work shifts, Rockland BOCES can decrease crowding and density at work sites and on public transportation.

Remote Work Protocols

Non-essential employees and contractors able to accomplish their functions remotely will be enabled to do so at the greatest extent possible. Working remotely requires:

1. Identification of staff who will work remotely.
2. Approval and assignment of remote work.
3. Equipping staff for remote work, which may include:
 - a. Internet capability
 - b. Essential Positions have access to Virtual Private Network (VPN) and/or secure network drives
 - c. Most have access to software and databases necessary to perform their duties
 - d. A solution for telephone communications
 - i. Note that phone lines may need to be forwarded to off-site staff.

Access to technology is essential for the successful roll-out of this plan. Rockland BOCES' Technology Team has created a plan which ensures equitable access to technology for staff and students and to support multiple modalities of instruction and learning. This will be accomplished through providing one-to-one technology access for students, digital content and platforms for instruction, and remote support for staff, students, and families.

In order to accomplish this, Rockland BOCES will ensure that its Technology Team is supported in its efforts to adhere to the *health and safety guidance* as established by the Center for Disease Control (CDC), the New York State Department of Health (NYSDOH) and the Rockland County Department of Health (RCDOH) that includes wearing PPE and maintaining six feet of physical distance where and when possible. For the health and safety of Rockland BOCES staff and students, one-to-one devices can be provided to the greatest extent possible. Additionally, Rockland BOCES' Technology Team will work with Administration to review and address any distance learning regulatory concerns and compliance issues, Family Educational Rights Privacy Act (FERPA/Health Insurance Accountability Portability Act (HIPAA), staff and student privacy, NYS ED Law 2D, and other concerns related to virtual learning environments.

The procurement of needed hardware, software, licenses, and learning platforms to improve virtual instruction will be based upon curricular needs in conjunction with Rockland BOCES policies and NYS State mandates. An agency-wide standard has been developed for the use of web-based teaching platforms to ensure compliance with NYS ED Law 2D and appropriate filtering programs such as GoGuardian or Lightspeed Relay have been installed. A deployment plan for needed technology that includes distributing and collecting devices, student and parent training (where needed), and information on *acceptable use policy* implementation has also been developed with assistive technology and training where appropriate and needed in accordance with students' IEPs. Access to technology support and technical assistance has been expanded to include staff, students, and families.

Professional development is and will continue to be provided in collaboration with the Rockland BOCES' Professional Development Center for effective virtual and hybrid instruction that may include using web-based tools to provide distance learning accessibility, navigation of software platforms, etc.;

student engagement; requirement for information privacy and security, and NYS ED Law 2D.

Rockland BOCES' communication plan for students, parents/guardians, staff, and visitors includes applicable instructions, training, signage, and communication strategies to ensure that stakeholders are provided with up-to-date information. Means of communication used by Rockland BOCES includes our website and official social media, and a phone and text alert system.

Staggered Shifts

Implementing staggered shifts may be possible for personnel performing duties which are necessary to be performed on-site but perhaps less sensitive to being accomplished only within core business hours. As possible, management will identify opportunities for staff to work outside core business hours as a strategy of limiting exposure. Regardless of changes in start and end times of shifts, Rockland BOCES will ensure that employees are provided with their typical or contracted minimum work hours per week as much as efficiently and fiducially possible. Staggering shifts may require:

1. Identification of positions for which work hours will be staggered.
2. Approval and assignment of changed work hours or staggered assigned days of work.
3. Creating teams of staff who will be assigned to only one location in order to limit contact with other employees.

Each department/office supervisor will ensure that schedules and physical space are conducive to necessary in-person work and will stagger work shifts of essential employees and contractors to reduce overcrowding at the worksite. Rockland BOCES will ensure that all employees practice social distancing and wearing face masks at all times. Rockland BOCES encourages the use of Zoom, Webex, and/or Google Meet whenever possible for meetings to reduce the density of in-person gatherings.

PERSONAL PROTECTIVE EQUIPMENT

Rockland BOCES will, to the best of its ability, ensure there is an adequate supply of personal protective equipment (PPE) to reduce the spread of infectious disease to support the health and safety of our employees and contractors. PPE that may be needed will include:

- Masks
- Face shields
- Gloves
- Disposable gowns and aprons

Protocols for Providing PPE include:

- Rockland BOCES has increased purchasing of PPE as well as disinfecting wipes and cleaning supplies. These products will be purchased in bulk where available.
 - Utilizing emergency procurement procedures if necessary.
 - Cleaning supplies will adhere to CDC and NYSDOH recommendations.
 - Cleaning and disinfecting supplies will be available for shared and frequently touched surfaces. Rockland BOCES will encourage employees to use these supplies, following manufacturer's instructions, before and after use of these surfaces and followed by hand hygiene.
- Rockland BOCES employees are welcome to use their own approved PPE such as masks and gloves, but these items will also be available in the building to ensure equitable access.

- Global Compliance Network (GCN) training on PPE usage is provided annually for all employees.
- Special PPE items such as clear face masks and shields will be provided if necessary for the employees' function and work location.
- Facilities will manage the storage of, access to, and monitor PPE stock.
 - Where possible, Rockland BOCES seeks to maintain an 8-week stockpile supply of PPE.
 - PPE is stored in a manner which will prevent degradation and complies with the manufacturer's storage recommendations.
 - Employees have immediate access to PPE in the event of an emergency.
 - The supply of PPE will be monitored to ensure integrity and to track usage rates.
 - The supply of PPE is monitored by the Assistant Superintendent for Career & Administrative Services and Assistant Facilities Manager.

PROCEDURES FOR A POSITIVE CASE

Rockland BOCES, in consultation with the RCDOH, will enact required protocols if a student or employee tests positive for disease and may have exposed others at school. Rockland BOCES will work closely with the NYSDOH and RCDOH in the event that large scale testing is needed. Plans for continuity of education, medical and social services, and meal programs for students in quarantine/isolation will be implemented. Individuals without exposure can return to the area and resume school activities immediately after cleaning and disinfection.

The Rockland BOCES District Superintendent/CEO, Chief Operating Officer/Deputy District Superintendent, and Pandemic Safety Officer will work with school/site administrators to identify and close the locations where a positive individual visited. Appropriate notification will be made to the occupants of such areas. Outside doors and windows will be opened to increase air circulation to the identified area(s). It is recommended that custodial staff wait at least 24 hours, when feasible, before cleaning and disinfecting. All areas such as offices, classrooms, bathrooms, lockers, and common areas used by the positive individual should be cleaned and disinfected. Once the area(s) have been appropriately cleaned and disinfected, the area(s) can be reopened for use.

If circumstances warrant, Rockland BOCES has a plan to close schools based on guidance from the NYSDOH.

In alignment with the CDC, NYSDOH, and RCDOH, Rockland BOCES' disease surveillance objectives are to monitor the spread and intensity of the pandemic; enable contact tracing to slow transmission; and, to identify disease clusters requiring special intervention. Rockland BOCES will also seek guidance to understand the severity and spectrum of the disease and to identify risk factors for and methods of preventing infection.

Rockland BOCES will ensure that it will keep accurate attendance records of students and staff members; ensure student schedules are up to date; and, keep a log of any visitors which includes dates, times, and destination. If contact tracing is necessary, Rockland BOCES has identified the Pandemic Safety Coordinator to coordinate these efforts. All efforts are in accordance with Education Law § 906. Confidentiality will be maintained as required by federal and state law and regulations. Responsible Parties will cooperate with all state and local health department contact tracing, isolation, and quarantine efforts.

Steps for cleaning and disinfecting an area where a positive individual visited will include: closing off the site area and appropriate notification will be made to the occupants of such areas; open outside doors

and windows to increase air circulation in the area; and, wait at least 24 hours before cleaning and disinfection. If waiting 24 hours is not feasible, wait as long as possible; clean and disinfect all areas used by the individual confirmed to have COVID-19, such as offices, classrooms, bathrooms, lockers, and common areas. Once the areas have been appropriately cleaned and disinfected they can be reopened for use.

EMPLOYEE AND CONTRACTOR LEAVE

Public health emergencies are extenuating and unanticipated circumstances in which Rockland BOCES is committed to reducing the burden on our employees and contractors. The *Families First Coronavirus Response Act (FFCRA)* provided requirements related to the COVID-19 pandemic in addition to the New York Emergency Paid Sick Leave Act. These may be altered based upon changes in law or regulation, as applicable.

Additional provisions may be enacted based upon need and the guidance and requirements in place by federal and state employment laws, FMLA, executive orders, and other potential sources.

Contractors, either independent or affiliated with a contracted firm, are not classified as employees of Rockland BOCES, and as such are not provided with paid leave time by Rockland BOCES.

DOCUMENTATION OF WORK HOURS AND LOCATIONS

In a Public Health Emergency, it may be necessary to document work hours and locations of each employee and contractor to support contact tracing efforts. Identification of locations shall include on-site work and off-site visits. This information may be used by Rockland BOCES to support contact tracing within the organization and may be shared with local public health officials.

Rockland BOCES has an absentee management system to track employee attendance. In addition, payroll and timesheets will further document an employee's presence on site. All employees will use their access cards or sign in as applicable for entrance at a site which also documents arrival on premises. Employees working in alternative Rockland BOCES locations are required to sign in at a Visitor Station and provide additional information such as name, date, time in and time out, who they are visiting, and the purpose of the visit. They are also required to complete a daily health screening and take their temperature. Each building has a Visitor Station. This process is required of all Rockland BOCES employees, contractors, and visitors.

HOUSING FOR ESSENTIAL EMPLOYEES

There are circumstances within a Public Health Emergency where it may be prudent to have essential employees lodged in such a manner to help prevent the spread of the subject communicable disease and protect these employees from potential exposures. This will also help to ensure their health and safety and the continuity of Rockland BOCES' essential operations.

If such a need arises, hotel rooms are expected to be the most viable option. If hotel rooms are for some reason deemed not practical or ideal, or if there are no hotel rooms available, Rockland BOCES will coordinate with the Rockland County Emergency Services to help identify and arrange for these housing needs. The Pandemic Safety Coordinator will help coordinate this if the need arises.