

Public Employer Health Emergency Plan for Holland Central School District



Approved by the Holland Central School District Board of Education on 2/22/21.

This plan has been developed in accordance with NYS legislation S8617B/A10832.

Promulgation

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable.

This plan has been developed with the input of the Holland Teachers Association, Holland Leadership Association, and the Teamsters Local #264, as required by the amended New York State Labor Law.

No content of this plan is intended to impede, infringe, diminish, or impair the rights of us or our valued employees under any law, rule, regulation, or collectively negotiated agreement, or the rights and benefits which accrue to employees through collective bargaining agreements, or otherwise diminish the integrity of the existing collective bargaining relationship.

This plan has been approved in accordance with requirements applicable to the agency, jurisdiction, authority, or district, as represented by the signature of the authorized individual below.

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As the authorized official of the Holland Central School District, I hereby attest that this plan has been developed, approved, and placed in full effect in accordance with S8617B/A10832 which amends New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable, to address public health emergency planning requirements.

Signed on this day:

By: Cathy V. Fabiatos

Title: Superintendent

Signature: _____



Record of Changes

Date of Change	Description of Change	Implemented by

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Purpose, Scope, Situation Overview, and Assumptions

Purpose

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and l of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. These laws were amended by the passing of legislation S8617B/A10832 signed by the Governor of New York State on September 7, 2020, requires 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 the Holland Central School District. 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.

Situation Overview

On March 11, 2020 the World Health Organization declared a pandemic for the novel coronavirus which causes the COVID-19 severe acute respiratory syndrome. This plan has been developed in accordance with amended laws to support continued resilience for a continuation of the spread of this disease or for other infectious diseases which may emerge and cause a declaration of a public health emergency.

The health and safety of our employees and contractors is crucial to maintaining our mission essential operations. We encourage all employees and contractors to use [CDC Guidance for Keeping Workplaces, Schools, Homes, and Commercial Establishments Safe](#). The fundamentals of reducing the spread of infection include:

- Using hand sanitizer and washing hands with soap and water frequently, including:
 - After using the restroom
 - After returning from a public outing
 - After touching/disposing of garbage
 - After using public computers, touching public tables, and countertops, etc.
- Practice social distancing when possible
- If you are feeling ill or have a fever, notify your supervisor immediately and go home
- If you start to experience coughing or sneezing, step away from people and food, cough or sneeze into the crook of your arm or a tissue, the latter of which should be disposed of immediately
- Clean and disinfect workstations at the beginning, middle, and end of each shift
- Other guidance which may be published by the CDC, the State Department of Health, or County health officials.

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 Coronavirus 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 expects us to maintain a level of mission essential operations
- Resource support from other jurisdictions may be limited based upon the level of impact the public health emergency has upon them
- 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
- Per S8617B/A10832, 'essential employee' is defined as a public employee or contractor that is required to be physically present at a work site to perform their job
- Per S8617B/A10832, 'non-essential employee' is defined as a public employee or contractor that is not required to be physically present at a work site to perform their job

Concept of Operations

The superintendent of the Holland Central School District, their designee, or their successor holds 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 Superintendent.

Upon the determination of implementing this plan, all employees and contractors of the Holland Central School District shall be notified by email and direct messaging system, with details provided as possible and necessary, with additional information and updates provided on a regular basis. District employees, parents/guardians, and the Board of Education will be notified of pertinent operational changes by way of email, the district website, social media and the district's direct messaging system. Other interested parties, such as vendors, will be notified by phone and/or email as necessary. The superintendent or his or her designee will maintain communications with the public and constituents as needed throughout the implementation of this plan.

The Superintendent of the Holland Central School District, their designee, or their successor 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 Superintendent of the Holland Central School District, their designee, or their successor will direct the resumption of normal operations or operations with modifications as necessary.

Mission Essential Functions

When confronting events that disrupt normal operations, the Holland Central School District is committed to ensuring that essential functions will be continued even under the most challenging circumstances.

Essential functions are those functions that enable an organization to:

1. Maintain the safety of employees, contractors, and our constituency
2. Provide vital services
3. Provide services required by law
4. Sustain quality operations
5. Uphold the core values of the Holland Central School District

The Holland Central School District has identified as critical only those priority functions that are required or are necessary to provide vital services. During activation of this plan, all other activities may be suspended to enable the organization to concentrate on providing the critical functions and building the internal capabilities necessary to increase and eventually restore operations. Appropriate communications with employees, contractors, our constituents, and other stakeholders will be an ongoing priority.

Essential functions are prioritized according to:

- The time criticality of each essential function
- Interdependency of a one function to others
- The recovery sequence of essential functions and their vital processes

Priority 1 identifies the most essential of functions, with priority 4 identifying functions that are essential, but least among them.

The mission essential functions for Holland Central School District have been identified as:

Role	Detail and Rationale
District Administration & Clerical Support	Required to ensure the fulfillment of our educational mission and continuity of the response efforts in the event of a public health emergency.
Building Administration & Clerical Support	Required to ensure the fulfillment of our educational mission and continuity of the response efforts in the event of a public health emergency.
Buildings & Grounds	If schools are directed to provide meals to students and families as outlined above, custodians and laborers will be essential in maintaining the safety of our schools and workplace. Snow removal, daily sanitation, and cleaning, etc. will be necessary if personnel are working within our schools for meal or instructional resource distribution.
Business Office	Essential functions are, at minimum, payroll and accounts payable. Dependent on the public health emergency, purchasing (of supplies and equipment) and accounts payable may serve essential functions.
Food service	If schools are directed to provide meals to students and families that are eligible to receive free and/or reduced priced meals, personnel will be essential for this purpose.

Health services	Essential functions include, assisting with contact tracing, testing, reporting requirements and monitoring health of individuals on/off campus.
Information Technology	Provides all hardware and software for the school system. Maintains critical communication tools including the network, email and phone system. While IT is an essential function of the organization, these positions can mainly work from a remote location and may be required to occasionally be onsite for equipment maintenance, repair and/or to exchange an inoperable device for a student, teacher or staff member.
Instruction & Student Support Services	As an educational organization, our primary mission is the education of our students. Equally important is supporting the special education and mental health needs of our students. While it is important to articulate that mission, with the evolution of our technological resources many of these functions can shift to a staggered schedule or fully remote program where teleconferencing, distance learning and other tools are utilized to fulfill our primary mission.
Personnel	Ensuring compliance with regulation, policy, and legal requirements to ensure safety and continuation of the workforce needed to operate the District.
Safety & Security	Ensuring the safety and security of the campuses.
Transportation	If schools are directed to provide meals to students and families as outlined above, or if schools are directed to provide a continuity of instruction, transportation personnel will be essential for the distribution of meals and/or instructional resources, such as technological devices.

Essential Positions

Each essential function identified above requires certain positions on-site to effectively operate. The table below identifies the positions or titles that are essential to be staffed on-site for the continued operation of each essential function. Note that while some functions and associated personnel may be essential, some of these can be conducted remotely and do not need to be identified in this section.

Role	Title(s)	Detail and Rationale
District Administration & Clerical Support	<ul style="list-style-type: none"> • Superintendent • Superintendent's Secretary 	<p>The Superintendent is responsible for assigning and overseeing all critical functions, assuring compliance with all CDC, DOH and NYSED requirements, establishing communication with staff, parents, community members, the Board of Education, and outside organizations, and determining staffing needs.</p> <p>The Superintendent's secretary will assist in those tasks.</p>
Food service	<ul style="list-style-type: none"> • Director of Food Service • Cook Manager 	Director of Food Service is responsible for accepting food deliveries and overseeing inventory.

	<ul style="list-style-type: none"> • Food service employees • Limited number of teacher aides for food service support 	Food service employees and teacher aides are needed for meal preparation and distribution.
Transportation	<ul style="list-style-type: none"> • Transportation Supervisor • Transportation secretary • Bus drivers • Bus aides • Mechanics 	<p>Transportation supervisor is responsible for overseeing drivers, the safety of our bus fleet, and onsite operations of the transportation department.</p> <p>Transportation secretary maintains communication with drivers, supporting the safety of drivers.</p> <p>Bus drivers and bus aides are critical in meal and instructional resource delivery.</p> <p>Mechanics are critical to the maintenance of our bus fleet.</p>
Buildings & Grounds	<ul style="list-style-type: none"> • Director of Facilities and Operations • Custodians • Cleaners • Laborers • Limited number of teacher aides for cleaning and sanitation support 	<p>The Director of Facilities and Operations prioritizes the duties of the department and oversees all staff.</p> <p>Custodians and cleaners are critical to the safety (sanitation, cleaning, and disinfecting) of schools fulfilling the essential functions.</p> <p>Laborers are critical to the maintenance of the facilities.</p>
Business Office	<ul style="list-style-type: none"> • Business Official • Payroll • Accounts Payable • Accounts Receivable 	While payroll and other business office functions are essential to the organization, these positions can occasionally work from a remote location. There are times, due to the highly confidential nature of their work or the fiscal controls and procedural nature of a duty necessitates on-site work. During such occasions, staggered schedules will be considered to reduce density of people in the workplace.
Health Services	<ul style="list-style-type: none"> • RN Coordinator • Nurses 	At least one nurse will be present on campus at all times to monitor the health of the employees working and assist with contract tracing, testing, and reporting requirements.

Reducing Risk Through Remote Work and Staggered Shifts

Through assigning certain staff to work remotely and by staggering work shifts, we 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 capable laptop
 - b. Necessary peripherals
 - c. Access to VPN and/or secure network drives
 - d. Access to software and databases necessary to perform their duties
 - e. A solution for telephone communications
 - i. Note that phone lines may need to be forwarded to off-site staff

The Superintendent and the district administrative staff will determine the level of remote working for all district employees in conjunction with all NYSDOH guidelines.

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, Holland Central School District will ensure that employees are provided with their typical or contracted minimum work hours per week. Staggering shifts requires:

1. Identification of positions for which work hours will be staggered
2. Approval and assignment of changed work hours

The Director of Facilities and Operations, Director of Food Service, and Transportation Supervisor will work with the Superintendent of Schools or a designee to formulate a calendar that schedules employees based on the needs of the District.

Personal Protective Equipment

The use of personal protective equipment (PPE) to reduce the spread of infectious disease is important to supporting the health and safety of our employees and contractors. PPE which may be needed can include:

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

Note that while cleaning supplies are not PPE, there is a related need for cleaning supplies used to sanitize surfaces, as well as hand soap and hand sanitizer. The Coronavirus pandemic demonstrated that supply chains

were not able to keep up with increased demand for these products early in the pandemic. As such, we are including these supplies in this section as they are pertinent to protecting the health and safety of our employees and contractors.

Protocols for providing PPE include the following:

1. Identification of need for PPE based upon job duties and work location
2. Procurement of PPE
 - a. As specified in the amended law, public employers must be able to provide at least two pieces of each required type of PPE to each essential employee and contractor during any given work shift for at least six months
 - b. Public employers must be able to mitigate supply chain disruptions to meet this requirement
3. Storage of, access to, and monitoring of PPE stock
 - a. PPE must be stored in a manner which will prevent degradation
 - b. Employees and contractors must have immediate access to PPE in the event of an emergency
 - c. The supply of PPE must be monitored to ensure integrity and to track usage rates

The administrative team, Director of Facilities and Operations, head custodians, and nurses will be responsible for ensuring that proper PPE is available at all buildings for required applications. The district will work to maintain an adequate supply of PPE as directed above for all staff, faculty and students. An extra supply of PPE will be available in all buildings with the principals, nurses or custodial staff. The Holland Central School District participates in cooperative bid purchasing agreements and is provided with a comprehensive list of suppliers and products used for maintaining employee safety, disinfecting and sanitization protocols.

Surplus PPE will be stored in a dry, secured central location. Access to the surplus PPE can only be made by the Director of Facilities and Operations or the Head Custodian as this will ensure an accurate count of all supplies on hand. The Director of Facilities and Operations will be responsible for keeping accurate records and reporting.

Staff Exposures, Cleaning, and Disinfection

Staff Exposures

Staff exposures are organized under several categories based upon the type of exposure and presence of symptoms. Following CDC guidelines, we have established the following protocols:

- A. If employees or contractors are exposed to a known case of communicable disease that is the subject of the public health emergency (defined as a 'close contact' with someone who is confirmed infected, which is a prolonged presence within six feet with that person):
 1. Potentially exposed employees or contractors who do not have symptoms should remain at home or in a comparable setting and practice social distancing for the lesser of 10 days or other current CDC/public health guidance for the communicable disease in question.
 - a. As possible, these employees will be permitted to work remotely during this period of time if they are not ill.
 - b. The Medical Director, RN Coordinator, and Superintendent must be notified and are responsible for ensuring these protocols are followed.

- c. See the section titled Documentation of Work Hours and Locations for additional information on contact tracing.
- B. If an employee or contractor exhibits symptoms of the communicable disease that is the subject of the public health emergency:
 - 1. Employees and contractors who exhibit symptoms in the workplace should be immediately separated from other employees, customers, and visitors. They should immediately be sent home with a recommendation to contact their physician.
 - 2. Employees and contractors who exhibit symptoms outside of work should notify their supervisor and stay home, with a recommendation to contact their physician.
 - 3. Employees should not return to work until they have met the criteria to discontinue home isolation per CDC/public health guidance.
 - 4. Holland Central School District will not require sick employees to provide a negative test result for the disease in question or healthcare provider's note to validate their illness, qualify for sick leave, or return to work; unless there is a recommendation from the CDC/public health officials to do so.
 - 5. The Medical Director, RN Coordinator, and Superintendent must be informed in these circumstances and are responsible for ensuring these protocols are followed.
- C. If an employee or contractor has tested positive for the communicable disease that is the subject of the public health emergency:
 - 1. Apply the steps identified in item B, above, as applicable.
 - 2. Areas occupied for prolonged periods of time by the subject employee or contractor will be closed off.
 - a. CDC guidance for COVID-19 indicates that a period of 24 hours is ideally given before cleaning, disinfecting, and reoccupation of those spaces will take place. If this time period is not possible, a period of as long as possible will be given. CDC/public health guidance for the disease in question will be followed.
 - b. Any common areas entered, surfaces touched, or equipment used shall be cleaned and disinfected immediately.
 - c. See the section on Cleaning and Disinfection for additional information on that subject.
 - 3. Identification of potential employee and contractor exposures will be conducted
 - a. If an employee or contractor is confirmed to have the disease in question, the RN Coordinator and Superintendent will work with the Erie County Department of Health to inform all contacts of their possible exposure. Confidentiality shall be maintained as required by the Americans with Disabilities Act (ADA).
 - b. Apply the steps identified in item A, above, as applicable, for all potentially exposed personnel.
 - 4. The Medical Director, RN Coordinator, and Superintendent must be notified in these circumstances and are responsible for ensuring these protocols are followed.

We recognize there may be nuances or complexities associated with potential exposures, close contacts, symptomatic persons, and those testing positive. We will follow CDC/public health recommendations and requirements and coordinate with our local public health office for additional guidance and support as needed.

Cleaning and Disinfecting

CDC/public health guidelines will be followed for cleaning and disinfection of surfaces/areas. Present guidance for routine cleaning during a public health emergency includes:

1. As possible, employees and contractors will clean their own workspaces in the beginning, middle, and end of their shifts, at a minimum.
 - a. High traffic/high touch areas and areas which are accessible to the public/constituents will be disinfected frequently.
 - b. The Building and Grounds staff, under direction of the Director of Facilities and Operations, is responsible for cleaning common areas, and the frequency of such.
2. Staff tasked with cleaning and disinfecting areas will be issued and required to wear PPE appropriate to the task.
3. Soiled surfaces will be cleaned with soap and water before being disinfected.
4. Surfaces will be disinfected with products that meet EPA criteria for use against the virus in question and which are appropriate for that surface.
5. Staff will follow instructions of cleaning products to ensure safe and effective use of the products.

Employee and Contractor Leave

Public health emergencies are extenuating and unanticipated circumstances in which the Holland Central School District is committed to reducing the burden on our employees and contractors. The *Families First Coronavirus Response Act* provided requirements related to the COVID-19 pandemic, which informed the policies outlined below. This policy may be altered based upon changes in law or regulation, as applicable.

It is our policy that employees of the Holland Central School District will not be charged with leave time for testing. Employees will be provided with up to two weeks (80 hours) of paid sick leave at the employee's regular rate of pay for a period which the employee is unable to work due to quarantine (in accordance with federal, state, or local orders or advice of a healthcare provider), and/or experiencing symptoms and seeking medical diagnosis.

Further, the Holland Central School District will provide up to two weeks (80 hours) of paid sick leave at two-thirds the employee's regular rate of pay if 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 orders or advice of a healthcare 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 the public health emergency, and/or the employee is experiencing a substantially similar condition as specified by the CDC/public health officials. This provision may be modified if an employee is able to effectively work remotely and the need exists for them to do so.

Additionally, the Holland Central School District will provide up to an additional 10 weeks of paid expanded family and medical leave at two-thirds of the employee's regular rate of pay where an employee, who has been employed for at least 30 calendar days by Holland Central School District, is unable to work due to a bona fide need for leave to care for a child whose school or childcare provider is closed or unavailable for reasons related to the public health emergency. This provision may be modified if an employee is able to effectively work remotely and the need exists for them to do so.

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 the Holland Central School District, and as such are not provided with paid leave time by the Holland Central School District, unless required by law.

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, off-site visits. This information may be used by the Holland Central School District to support contact tracing within the organization and may be shared with local public health officials.

The Holland Central School District uses a swipe card system of entry at each building. Employees are required to use their individual I.D./access cards to enter, which then creates a log of their arrival times at each location. Hourly employees also turn in paper or electronic time sheets that include their work hours for each week. Each employee's supervisor is responsible for keeping track of this information. In addition, all visitors are required to sign in, and the district keeps a log of visitors and the times they enter and exit in each building.

Housing for Essential Employees

There are circumstances within a public health emergency when it may be prudent to have essential employees lodged in such a manner which will help prevent the spread of the subject communicable disease to protect these employees from potential exposures, thus helping to ensure their health and safety and the continuity of the Holland Central School District's 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, the Holland Central School District will coordinate with the Erie County Department of Homeland Security and Emergency Services to help identify and arrange for these housing needs. The Superintendent will work with the employee's supervisor to coordinate this.