

GRACE LUTHERAN PRESCHOOL

“Learn and Grow in a Faithful Community”

Infectious Disease (COVID-19) Preparedness and Response Plan

August 11, 2020

TEMPLATE USED FROM VIRGINIA DEPARTMENT
OF LABOR AND INDUSTRY

<https://www.doli.virginia.gov/covid-19-outreach-education-and-training/>

I. Purpose

This plan describes the implementation of mandatory health and safety requirements established by the Virginia Department of Labor and Industry, Governor Northam's COVID-19 Executive Order and subsequent Addendum as well as guidelines from the Centers for Disease Control.

II. Responsibilities

GRACE LUTHERAN PRESCHOOL has assigned the following individual(s) to serve in the role of health officer. The health officer has the authority to stop or alter activities to ensure that all work practices conform to the mandatory safety and health requirements applicable to COVID-19 as well as any other infectious disease hazards.

The following table is an example.

Health Officer(s)			
Name	Title	Department	Phone Number
	Executive Director	Grace Lutheran Preschool	540-678-0635
	Appointed Preschool Board Member	Grace Evangelical Lutheran Church	540-662-6678

For the purpose of ensuring compliance with the most recent safety and health requirements, **GRACE LUTHERAN PRESCHOOL BOARD OF DIRECTORS** is responsible for administering this plan, monitoring agencies for new requirements, updating this plan, communicating any changes to employees, and monitoring the overall effectiveness of the plan. This person is also responsible for providing employees with a copy of this plan upon request.

III. Determination of Exposure Risk by Job Duty

We have determined the COVID-19 exposure risk level of all worksite functions to ensure that we apply appropriate hazard controls – including training, equipment, and personal

protective equipment (PPE) – to protect employees’ safety and health. This assessment is based on OSHA Publication 3990. Classes of employees have been assigned to risk categories as follows:

Exposure Risk Level means an assessment of the possibility that an employee could be exposed to the hazards associated with SARS-CoV-2 virus and the COVID-19 disease. Hazards and job tasks have been divided into four risk exposure levels: “Very High”, “High”, “Medium”, and “Lower”.

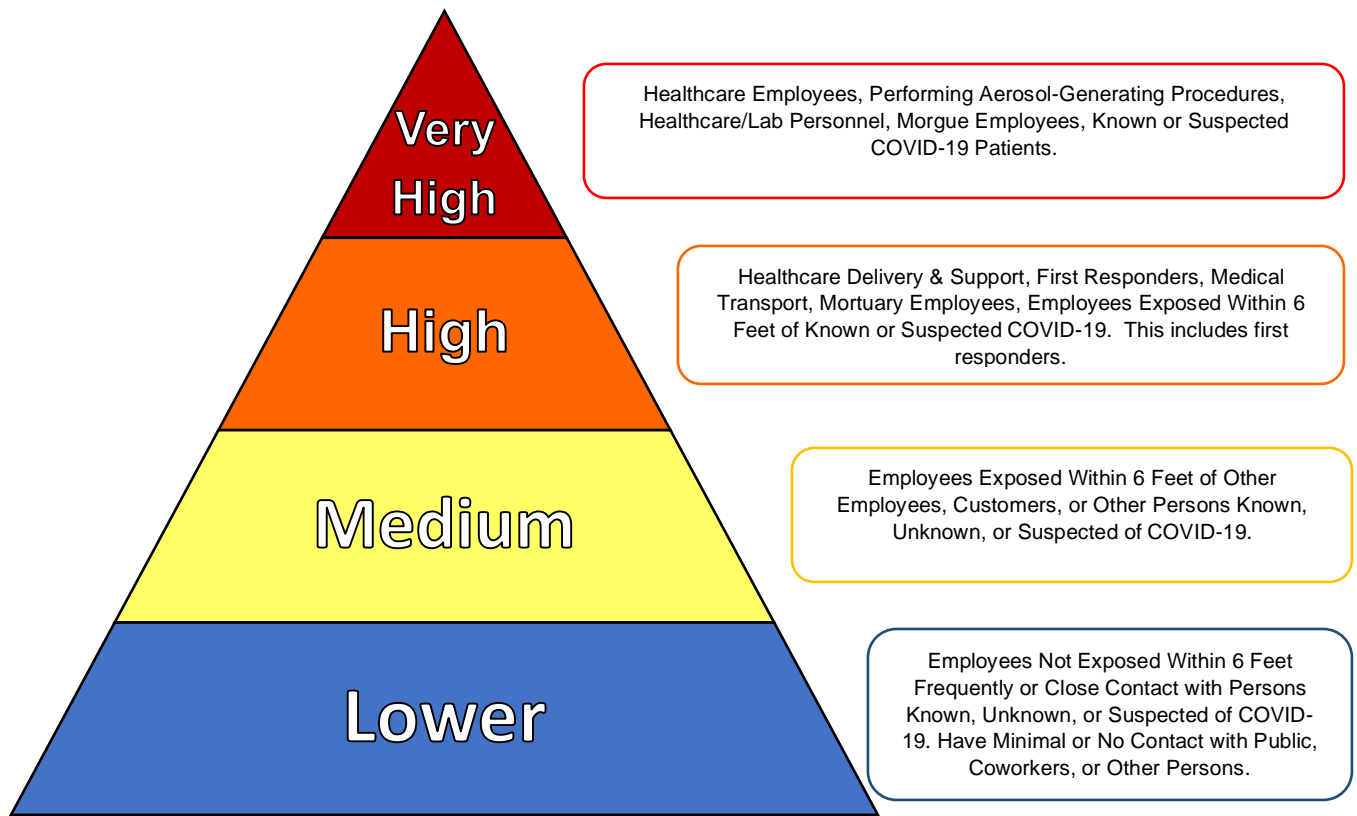
“Very High” exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure to known or suspected sources of the SARSCoV-2 virus and the COVID-19 disease including, but not limited to, during specific medical, postmortem, or laboratory procedures (refer to page 8 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

“High” exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure within six feet with known or suspected sources of SARS-CoV-2 that are not otherwise classified as “very high” exposure risk (refer to page 8 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

“Medium” exposure risk hazards or job tasks that are not labeled as “very high” or “high” (refer to pages 9-10 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

“Lower” exposure risk hazards or job tasks are those not otherwise classified as “very high”, “high”, or “medium” exposure risk that do not require contact within six feet of persons known to be, or suspected of being, or who may be infected with SARS-CoV-2; nor contact within six feet with other employees, other persons, or the general public except as otherwise provided in this definition (refer to page 10 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

The following graph relates to job tasks that pose a risk level to employees. The job tasks that are listed are not an all-inclusive list.



Consult the definition of “Exposure risk level” of the Emergency Temporary Standard for COVID-19 by the Virginia Department of Labor and Industry. Also, consult pages 18 - 21 of the OSHA document “Guidance on Preparing Workplaces for COVID-19” which is available at <http://www.osha.gov/Publications/OSHA3990.pdf> and determine the risk level of each employee or class of employee based on their type of work and duties. Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.

When you have determined the risk level of all your employees and officials, list the work area, job/job tasks, employee exposure risk, and qualifying factors in the table.

The following table is an example.

Work Area	Job Tasks	Exposure Risk Determination	Qualifying Factors (Example: No Public Contact, Public Contact)
<i>Office/ Classrooms</i>	<i>Executive Director</i>	<i>Medium</i>	<i>Public Contact</i>
<i>Office/ Classrooms</i>	<i>Assistant Director</i>	<i>Medium</i>	<i>Public Contact</i>
<i>Classroom</i>	<i>Teacher</i>	<i>Medium</i>	<i>Public Contact</i>
<i>Classroom</i>	<i>Assistant Teacher</i>	<i>Medium</i>	<i>Public Contact</i>
<i>Classroom</i>	<i>Remote Learning Teacher</i>	<i>Lower</i>	<i>Minimal Contact</i>

IV. Contingency Plan in the Event of an Infectious Disease Outbreak

In the event that an outbreak or pandemic due to an infectious disease, **GRACE LUTHERAN PRESCHOOL** has set up contingency plans for addressing the workplace needs as well as employee safety and health during the outbreak.

These plans are as follows:

Grace Lutheran Preschool is recognized to fall under a Medium Exposure Risk Level defined by the Virginia Department of Labor to be:

Medium Exposure Risk – Jobs that require more than minimal occupational contact inside six feet with other employees, other persons, or the general public who may be infected with SARS-CoV-2, but who are not known or suspected to be infected with the SARS-CoV-2 virus.

Examples:

- i. Schools

- ii. High population density work environments (e.g., poultry, meat, other food processing; manufacturing, etc.)
- iii. High-volume customer facing retail settings (grocery stores, restaurants, bars, etc.)
- iv. Mass gathering venues (e.g., sports, entertainment, movies, theaters, etc.)

Contingency Plan Steps:

- Step 1: Inform employees, church staff, Preschool Board of Directors, and families of a positive case of COVID-19. Notify local Virginia Department of Health (VDH).
- Step 2: Monitor data of additional sickness related to COVID-19 within the workplace. Follow guidelines set forth by VDH.
- Step 3: Upon recommendation of VDH, report outbreak to Virginia Department of Labor: <https://www.doli.virginia.gov/report-a-workplace-fatality-or-severe-injury-or-covid-19-case/>

Reporting COVID-19 positive cases: [16 VAC 25-220-40.B.8.e](#) of the Emergency Temporary Standard, Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19 provides that “The employer shall notify the Virginia Department of Labor and Industry within 24 hours of the discovery of three (3) or more employees present at the place of employment within a 14-day period testing positive for SARS-CoV-2 virus during that 14-day time period.”

How to Report:

Employers can report by telephone, [online](#) or in-person to the nearest **VOSH Regional Office**; or through the OSHA toll-free central telephone number, 1-800-321-6742.

Be prepared to supply: *Business name; names of employees affected; location and time of the incident, brief description of the incident; contact person and phone number.*

(804) 371-3104	Central Region Office
(703) 392-0900	Northern Virginia Region Office
(757) 455-0891	Tidewater Region Office
(540) 562-3580	Southwest Region Office
(276) 676-5465	Abingdon Field Office
(434) 385-0806	Lynchburg Field Office
(540) 248-9280	Verona Field Office

During normal business hours (8:15 A.M. – 4:30 P.M.) an incident should be reported to the closest regional or field office.

(804) 229-4666 Cell Phone	Central Region Office
(571) 264-4089 Cell Phone	Northern Virginia Region Office
(757) 837-2017 Cell Phone	Tidewater Region Office
(540) 983-5362 Pager	Southwest Region Office
(540) 983-5362 Pager	Abingdon Field Office
(540) 983-5362 Pager	Lynchburg Field Office
(571) 264-4089 Cell Phone	Verona Field Office

Before or after normal business hours or on weekends and holidays, incidents can be reported by calling the appropriate cell phone or pager number for the nearest office. If unable to reach the local phone numbers or pagers, the State Police Duty Sergeant in Richmond, VA should be contacted at 804 674-2026.

V. Basic Infectious Disease Prevention and Control Measures

To control the spread of infectious diseases such as COVID 19, basic prevention and control measures must be implemented to ensure that all employees are protected against the hazards of infectious disease.

To control the spread of infectious disease it is important to keep up general housekeeping in the workplace. Additional housekeeping actions must also be implemented to ensure the safety and health of employees and decreasing the chances of spread of an infectious disease such as: All restrooms, common areas that remain in use, door knobs/handles, tools, equipment, and other frequently touched surfaces are disinfected before, in the middle of, and at the end of each shift. All contact surfaces of vehicles used by more than one person are disinfected at the end of each person's use. All disinfectants are EPA-approved or otherwise comply with [CDC disinfection guidance](#).

GRACE LUTHERAN PRESCHOOL teachers and assistants are responsible for cleaning during and after each school day. They will disinfect all surface areas, sweep floors clean, sanitize toys, and take out classroom trash. Our janitorial service will deep clean all areas in preparation for the start of each school day.

Additional precautions and actions to take are **GRACE LUTHERAN PRESCHOOL specific actions being taken:**

- Large gatherings are minimized whenever possible; staff meetings are appropriately social distanced, postponed, cancelled or held remotely;
- Employees are encouraged to maintain physical distance even when on break, as well as before and after working hours;
- Employees are required to maintain physical distance when reporting to work, clocking in, leaving work, and clocking out;
- Employee work stations are greater than six feet apart;
- The employer may utilize flexible work hours, wherever possible, to limit the number of employees simultaneously working on-site; and
- Employee interactions with the general public are modified to allow for additional physical space between parties.

VI. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees protected characteristics as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employee's personnel documentation.

1. Employee Self-Monitoring

The following employees should **not** report to work and, upon notification to **EXECUTIVE DIRECTOR** will be removed from the regular work schedule:

- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;

- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

Such employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

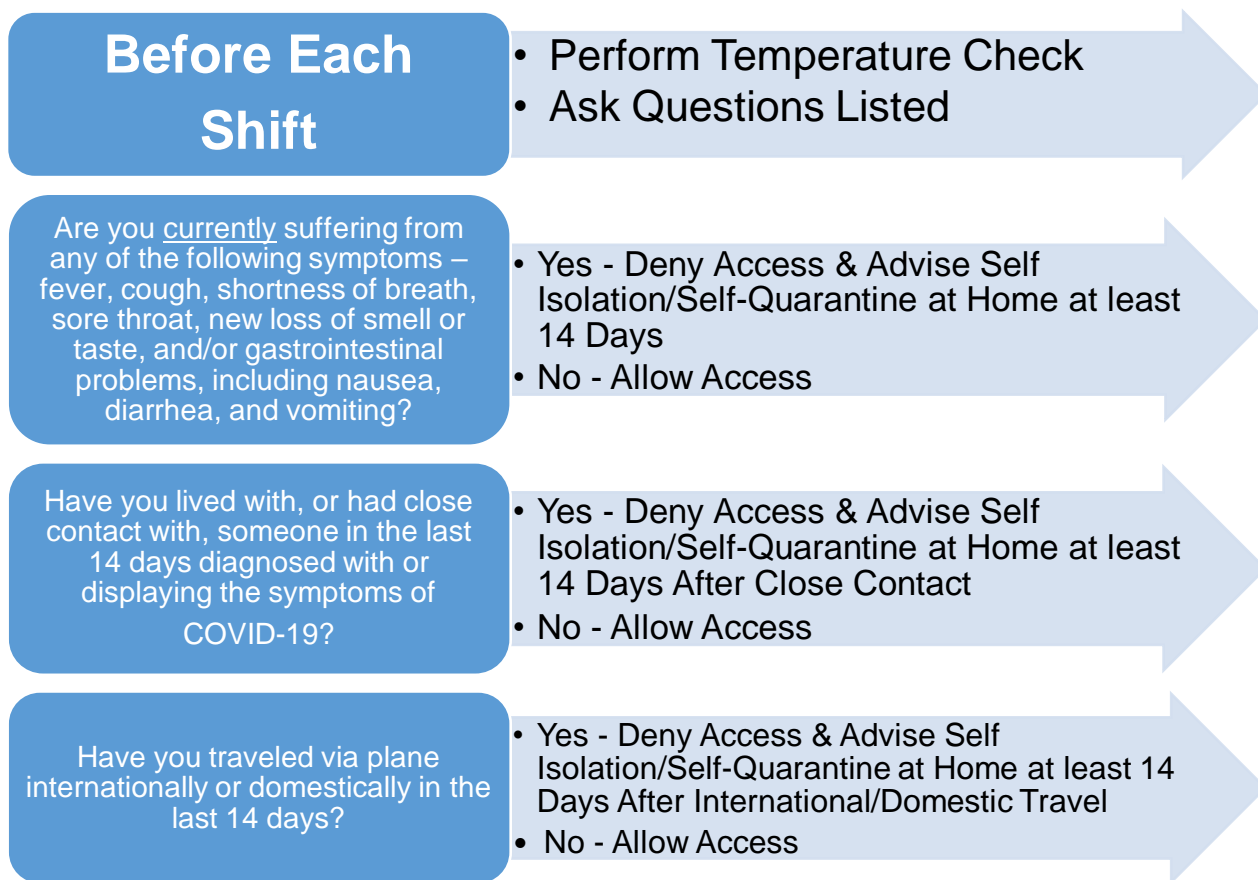
2. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, **GRACE LUTHERAN PRESCHOOL** screens employees on a daily basis.

Employees are asked the following questions before entering the worksite:

1. Are you currently suffering from any of the following symptoms – fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
 - a. If a touchless thermometer is available, temperature checks are performed.
 - b. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.

A reference chart of the above daily screening questions is listed below.



Employees who develop symptoms during their shift must immediately report to their supervisor.

3. *Return-to-Work Requirements*

Employees who were themselves diagnosed with COVID-19 may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); and

- Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.

Under the non-test-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
- At least 7 days have passed since symptoms first appeared.

Employees who come into close contact with or who may live with an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed and/or symptomatic individual. This includes the diagnosed and/or symptomatic individual receiving a negative COVID-19 test.

Employees are typically required to submit a release to return to work from a healthcare provider; given the current stressors on the healthcare system, **GRACE LUTHERAN PRESCHOOL** may accept written statements from employees confirming all the factors supporting their release.

Actively encourage sick employees to stay home:

- Include a statement regarding your PTO program. The Families First Coronavirus Response Act Policies and Posters are to be posted in common places as well as on the employee shared IT drives (if employees have questions regarding use of emergency paid sick time, employees should contact **EXECUTIVE DIRECTOR**).
- **GRACE LUTHERAN PRESCHOOL** will follow state and federal guidance for return to work guidance.
 - Guidance from the employee's health care provider will also be considered.

VII. Procedures for Minimizing Exposure from Outside of Workplace

GRACE LUTHERAN PRESCHOOL business practices are evaluated to ensure the safety and health of all individuals. This is done on a phased approach. Beginning with appointment only onsite meetings, virtual meetings, and finally transitioning to onsite meetings with appropriate precautions when that time comes.

- Social distancing practices to be observed:
 - 6-foot distances are marked in areas where customers might gather/wait
 - In person meetings are to be made by appointments only
 - Limit the number of customers allowed into workplace
 - Minimize face to face contact

Information is posted throughout the worksite educating individuals on ways to reduce the spread of COVID-19.

Any individual entering one of **GRACE LUTHERAN PRESCHOOL** facilities may have their temperature checked and/or a questionnaire completed prior to entry.

To minimize exposure from visitors or vendors:

- *All business partners that work within **GRACE LUTHERAN PRESCHOOL** have been provided this Plan.*
- *When possible, **GRACE LUTHERAN PRESCHOOL** will limit the number of visitors in the facility.*
- *Any individual entering one of the **GRACE LUTHERAN PRESCHOOL** facilities may have their temperature checked and/or a questionnaire completed prior to entry.*
- *Masks may be available to visitors/vendors as well as appropriate disinfectants so individuals can clean work areas before and after use.*
- *All deliveries will be handled through curbside pick-up or delivery.*

Minimizing exposure from the general public:

- Social distancing practices to be observed:

- 6-foot distances are marked in areas where individuals might gather/wait.
- Limit number of individuals allowed into workplace.
- Minimize face to face contact:
 - Computer workstations positioned at least 6 feet apart
- Information is posted at **GRACE LUTHERAN PRESCHOOL** facility educating individuals on ways to reduce the spread of COVID-19.
- Any individual entering **GRACE LUTHERAN PRESCHOOL** may have their temperature checked and/or a questionnaire completed prior to entry.
- Individual symptoms may be assessed of COVID-19 and individuals with symptoms will be removed from the workplace.
- Masks may be available to the general public as well as appropriate disinfectants so individuals can clean work areas before and after use.

VIII. Training

All employees at **GRACE LUTHERAN PRESCHOOL** will be required to have training on the hazards and characteristics of SARS-CoV-2 virus and COVID-19 disease. This training will ensure that all employees recognize the hazards of SARS-CoV-2 and COVID-19 as well as the procedures to minimize the hazards related to the infectious diseases and help prevent the spread of the infectious disease.

The training material will cover the following:

- Requirements of the COVID-19 Emergency Regulation.
- Companies Infectious Disease Preparedness and Response Plan.
- Characteristics and methods of spread of SARS-CoV-2 virus.
- Symptoms of COVID-19 disease as well as the asymptomatic reactions of some persons to the SARS-CoV-2 virus.
- Safe and healthy work practices, including but not limited to, physical distancing, disinfection procedures, disinfecting frequency, and noncontact methods of greeting.

- PPE
 - When PPE is required
 - What PPE is required
 - How to properly don, doff, adjust and wear PPE
 - Limitations of PPE
 - Proper care, maintenance, useful life and disposal of PPE

All employees in the workplace will be trained on this subject and procedures. All training will be certified and recorded according to the Emergency Regulations for COVID-19 by the Virginia Department of Labor and Industry.

Training Records will be certified by the following requirements (see example below):

- Employee name
- Employee’s signature (physical or electronic)
- Date
- Signature of Trainer

The following table is an example.

Date:		Trainer:	
Employee Name (Printed)	Employee Name (Signature)	Work Area	COVID-19 Risk Level

Retention of training records must be retained in employee files. These records are located IN EXECUTIVE DIRECTOR’S OFFICE. The most recent training records will be maintained.

Industry Specific Guidelines

Office Regulations

- a)** Assign dedicated entry point(s) for all employees to reduce congestion at the main entrance.
- b)** Provide visual indicators of appropriate spacing for employees outside the building in case of congestion.
- c)** Take steps to reduce entry congestion and to ensure the effectiveness of screening (e.g., by staggering start times, adopting a rotational schedule where only half of employees are in the office at a particular time).
- d)** Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways.
- e)** Increase distancing between employees by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g., cafeterias), providing visual cues to guide movement and activity (e.g., restricting elevator capacity with markings, locking conference rooms).
- f)** Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office.
- g)** Provide disinfecting supplies and require employees wipe down their workstations at least twice daily.
- h)** Post signs about the importance of personal hygiene.
- i)** Disinfect high-touch surfaces in offices (e.g., whiteboard markers, restrooms, handles) and minimize shared items when possible (e.g., pens, remotes, and whiteboards).
- j)** Institute cleaning and communications protocols when employees are sent home with symptoms.
- k)** Notify employees if the employer learns that an individual (including a customer, supplier, or visitor) with a confirmed case of COVID-19 has visited the office.
- l)** Suspend all nonessential visitors to the preschool.
- m)** Restrict all non-essential travel, including in-person conference events.