

# **Eden Central School District**

## **Continuation of Operations Plan**

**~Amendment to the District Safety Plan**

**January 2021**

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

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## 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 paragraph m 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. Governor Cuomo signed into law Chapter 168 of the Laws of 2020 that requires public employers, including public school districts, to adopt a continuation of operations plan in the event that the governor declares a public health emergency involving communicable disease.

This plan has been developed with the input of Eden Teachers Association (Local #2627) , Eden School Employees Association (CSEA) , Eden Central Office Administrators and the Principals Association 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.

As the authorized official of **Eden 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 paragraph m 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.

## Approval and Implementation

This Communicable Disease Plan (CDP) has been approved for implementation by:

Signature:   
Print Name: Jeffrey A. Sortisio  
Title: Superintendent  
Signed on this Date: 2/23/21

## Definitions

**Communicable disease:** shall mean an illness caused by an infectious agent or its toxins that occurs through the direct or indirect transmission of the infectious agent or its products from an infected individual or via an animal, vector or the inanimate environment to a susceptible animal or human host. A communicable disease can be spread from one person to another through a variety of ways that include: contact with blood and bodily fluids; breathing in an airborne virus; or by being bitten by an insect.

**Contractor:** shall mean an individual performing services as party to a contract awarded by the state of New York or any other public employer defined in paragraph b of this subdivision. "

**Visitors:** shall refer to a person who comes to spend time with or stay with others in a place temporarily.

**Essential employee:** shall refer to a designation made that a public employee or contractor is required to be physically present at a work site to perform his or her job.

**Non-essential employee:** shall refer to a designation made that a public employee or contractor is not required to be physically present at a work site to perform his or her job.

**Personal protective equipment (PPE):** shall mean all equipment worn to minimize exposure to hazards, including gloves, masks, face shields, foot and eye protection, protective hearing devices, respirators, hard hats, and disposable gowns and aprons.

**Public employer or employer:** shall mean the state of New York, a county, city, town, village or any other political subdivision or civil division of the state, a public authority, commission or public benefit corporation, or any other public corporation, agency, instrumentality or unit of government which exercises governmental power under the laws of this state, provided, however, that this subdivision shall not include any employer as defined in section twenty-eight hundred one-a of the education law.

**Retaliatory action:** shall mean the discharge, suspension, demotion, penalization, or discrimination against any employee, or other adverse employment action taken against an employee in the terms and conditions of employment.

## **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 law requires public employers to adopt a plan for operations in the event of a declared public health emergency involving a communicable disease, which shall include identification of essential personnel, needed personal protective equipment, staggering work shifts and providing necessary technology for telecommuting. Provisions and protocols for supporting contact tracing and to identifying sites for emergency housing for essential employees.

### **Scope**

This plan is pertinent to a declared public health emergency involving communicable disease in the State of New York that may affect **Eden Central School District (ECSD)**. It is in the interest of the safety of our students, staff, visitors and contractors, and the continuity of our operations that we have promulgated this plan. This plan has taken guidance from the **ECSD** reopening school plan developed in response to COVID-19. That plan establishes and explains the necessary policies and practices that were put into place following federal, state and local health official's guidelines.

### **Situation Overview**

This plan has been developed in accordance with amended laws to support continued resilience to deal with infectious diseases which may emerge and cause a declaration of a public health emergency.

The health and safety of our students, staff, visitors and contractors is crucial to maintaining our mission essential operations. Our plan incorporates recommendations and guidance from the Centers for Disease Control and Prevention (CDC), the New York State Department of Health (NYSDOH), and the New York State Education Department (NYSED). The fundamentals of reducing the spread of infection include:

- The District will emphasize washing hands with soap and water or using hand sanitizer frequently, including:
  - After using the restroom
  - After blowing your nose, coughing or sneezing
  - After touching/disposing of garbage
  - After handling your face covering
  - Before, during, and after preparing or eating food
  - Before touching your face
  - After using a public computer, touching tables, chairs and countertops, etc.
- Practice social distancing and wearing a face covering whenever it cannot be maintained;

- If you are sick stay home, notify your supervisor immediately;
- Staff, students, visitors and contractors do daily self-screening if necessary, based on guidance of symptoms from our local, state and federal health departments;
- Students or staff with a temperature, signs of an illness who come to school will be sent directly to a dedicated isolation area, prior to being picked up or otherwise sent home;
- Cleaning and disinfecting frequency, especially high touch areas;
- Any other guidance, which may be published by the Center for Disease Control and Prevention (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 from federal, state and local health officials. 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, visitors and contractors, and their families, is of utmost importance.
- The circumstances of a public health emergency may directly impact our own operations and the way we teach our students in our facilities.
- 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 and local health officials and the Governor of New York State.
- 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 District Superintendent of Schools of **ECSD**, his/her designee, or his/her 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 District Superintendent of Schools.

Upon the determination of implementing this plan, all employees and contractors of **ECSD** shall be notified with details provided as possible and necessary, with additional information and updates provided on a regular basis. Identify constituency groups will be notified of pertinent operational changes by way of identifying means of public/constituent notification. Other interested parties, such as vendors, will be notified by phone and/or email as necessary. title of communications lead will maintain communications with the public and constituents as needed throughout the implementation of this plan.

The Superintendent of **ECSD**, his/her 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 **ECSD**, his/her 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, **ECSD** 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 staff, contractors, and our constituency
2. Provide vital services
3. Provide services required by law
4. Sustain quality operations
5. Maintain essential building functions and systems.
6. Uphold the core values of **ECSD** with a commitment to students, families and the community.

The **ECSD** 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

Our list of essential positions that may be physically present in the event of a state-ordered reduction of in-person staff are as followed to monitor buildings and maintain payroll and system management:

- School Superintendent with his/her necessary support staff;
- Finance Director and his/her necessary support staff;
- Director of Facilities and his/her necessary support staff;
- Maintenance Mechanics;
- Cleaners;

The mission essential functions for **ECSD** have been identified as:

1. Maintain the safety of staff, visitors, and contractors.;
2. Provide vital services;
3. Provide services required by law;
4. Sustain quality operations;
5. Maintain essential building functions and systems.
6. Uphold the core values of the **Eden Central School District**.

**ECSD** has determined the following functions are deemed essential to the fulfillment of our mission, in the event of a state-ordered reduction of in-person staff

<b>Essential Function</b>	<b>Description/Role of Position</b>
District Administration & Clerical Support	Making day-to-day decisions about educational programs, spending, staff, and facilities
Information Technology	Providing tech support to both students and staff. Maintains critical communication tools including the network, email and phone system.
Food Services	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. Distribute food to students who need nutritious meals while schools are closed.
Buildings and Grounds	If schools are directed to provide meals to students and families as outlined above, custodians and laborers will be essential in the safe opening of schools. Address requirements of facilities and facility systems (e.g. gas and electricity), as well as space use and management. Daily sanitation and cleaning, snow removal when necessary, etc. if personnel are working within our schools for meal, instructional resource distribution or other functions.
Business Office	The two essential functions that would need to continue in our business office at minimum would be payroll and accounts payable.
Personnel Matters	Ensuring compliance with regulation, policy, and legal requirements to ensure safety and continuation of the workforce needed to operate the District.
Transportation	If schools are directed by the state to provide meals to students and families, 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 technology. Eden Central School District will comply with all mandated regulations in the needs of transporting students.
Curriculum Office & Students Support Services	Maintaining the instructional programs for our students

## 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.

Essential Function	Essential Positions/Titles	Justification for Each
District Administration & Clerical Support	Superintendent  Staff- As needed	Establishes all priorities for the district and provide support to staff  Fulfilling tasks as directed by superintendent
Information Technology	Manger  Staff- As needed	The IT manager establishes all priorities for IT tasks and organizes staff.  IT staff members provide support in setting up hardware and software, network management, and help desk support. Maintains critical communication tools including the network, email and phone system and help desk support
Food Services	Manager  Food service staff/Teacher aides	To direct and organize staff. Overseeing inventory.  Food service employees and teacher aides are needed for meal preparation and distribution.
Buildings and Grounds	Director of Facilities  Mechanics/custodians/laborers	Prioritizes the duties of the department and oversees all staff.  Fulfilling the essential functions in the district to maintain the safety of the staff in the facilities.
Business Office	Director of Finance  Payroll clerk/District treasurer	Prioritizes the duties of the office and oversees all staff.  Fulfilling the essential functions in the district (payroll, account payable and receivable)

Personnel Matters	Director of Finance	Ensures regulatory, policy, and legal compliance during this time. To direct and organize staff.
	Administrative assistants	Maintain personnel matters and help employees work effectively and efficiently remotely.
Transportation	Supervisor	Overseeing drivers, the safety of our bus fleet, and onsite operations of the transportation department.
	Staff- As needed Bus drivers/clerical/ mechanics	Aide in meal and instructional resource delivery. Maintenance of our bus fleet.
Curriculum Office	Director of Curriculum	Develop and maintain the instructional program for students, either in a hybrid/remote learning model.

## 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

IT will provide infrastructure to support web meetings. Devices will be distributed to staff and students as needed for remote learning. Families that would like assistance from the district for connectivity issues, please call (716) 992-3616. Schools and districts should provide instruction on using technology and IT support for students, teachers and families and provide professional development for teachers and leaders on designing effective online/remote learning experiences.

## 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. If necessary, 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, **ECSD** will ensure that employees are provided with their typical or contracted minimum work hours per week.

## 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:

- Face Coverings
- 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 for PPE based upon job duties and work location:
  - a. Superintendent & Staff, Business Office & Staff, Personnel Office & Staff and Curriculum Office --- PPE needed-Face Coverings
  - b. Buildings & Grounds --- PPE needed-Face Coverings, gloves and eye protection
  - c. Nurses --- PPE needed-Face Coverings, gloves and gowns
  - d. Transportation --- PPE needed-Face Coverings and gloves
2. Procurement of PPE
  - a. As specified in the amended law, **ECSD** will provide at least two pieces of each required type of PPE to each essential employee during any given work shift for at least six months
  - b. **ECSD** is able to mitigate supply chain disruptions to meet this requirement by using Q Ware Inventory Management Software to track the usage of PPE. This system manages supply quantities and has a reorder threshold to help prevent running out of stock. We have set suppliers that are able to provide us with PPE and also have the ability to use the Erie County trusted vendors list in case of any disruptions.

3. Storage of, access to, and monitoring of PPE stock
  - a. PPE is stored in a climate-controlled environment, which will prevent degradation
  - b. Employees have immediate access to PPE in the event of an emergency
  - c. The supply of PPE is monitored to ensure integrity and to track usage rates using Q Ware Software.

The Director of Facilities will work with the schools to determine inventory needed to support the district based on the numbers of staff and students, and with considerations necessary for essential workers to remain on site. PPE is stored in one location to maintain control of the inventory. Contractors, either independent or affiliated with a contracted firm, are not classified as employees of **ECSD**, and as such are not provided with PPE by **ECSD**, unless required by state and federal law. The contractor is accountable for supplying the appropriate PPE equipment to its workers prior to entering the facilities.

## **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 a student, staff, visitor 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), CDC and Public Health guidance for the disease in question will be followed.
- B.
  - a. Any common areas entered, surfaces touched, or equipment used shall be cleaned and disinfected immediately
  - b. The District Superintendent will be notified .
  - c. See the section on Cleaning and Disinfection for additional information on this subject
  - d. See the section titled Documentation of Work Hours and Locations for additional information on contact tracing

CDC guidelines for COVID-19 provide that critical essential employees may be permitted to continue work following potential exposure, provided they remain symptom-free and additional precautions are taken to protect them, other employees and contractors, and our constituency/public.

- a. Additional precautions will include the requirement of the subject employee or contractor, as well as others working in their proximity, to wear appropriate PPE at all times to limit the potential of transmission.
- b. In-person interactions with the subject employee or contractor will be limited as much as possible.
- c. Work areas in which the subject employee or contractor are present will be disinfected according to current CDC/public health protocol, as practical. See the section on Cleaning and Disinfection for additional information on that subject.
- d. If at any time they exhibit symptoms, refer to item B below.

- e. identify who, by title/position, in the organization is the decision-maker in these circumstances and who is responsible for ensuring these protocols are followed
- C. If an employee or contractor exhibits symptoms of the communicable disease that is the subject of the public health emergency:
  1. Students, staff, visitors and contractors who exhibit symptoms in the workplace should be immediately separated from other students, staff, visitors and contractors. They should immediately be sent home with a recommendation to contact their physician, in the case of a student
  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 and have consulted with a healthcare provider.
  4. The Schools District Offices must be informed in these circumstances and are responsible for ensuring these protocols are followed
- D. 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, appropriate position or title or their designee should inform all contacts of their possible exposure. Confidentiality shall be maintained as required by the Health Insurance Portability and Accountability Act (HIPAA).
    - b. Apply the steps identified in item A, above, as applicable, for all potentially exposed personnel.
  4. The Finance Director for Personnel Matters 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 the Center for Disease Control and Prevention (CDC) and the public health recommendations and requirements and

coordinate with our local public health office for additional guidance and support as needed. If it is determined by the New York State Department of Health to do Rapid Testing of individuals, which was used during COVID-19 to detect that virus, we will follow this requirement.

## **Cleaning and Disinfecting**

The Center for Disease Control and Prevention (CDC) provides specific guidance for schools to aid in determining what level of cleaning and/or disinfection is necessary. Our cleaning will include classrooms, restrooms, cafeterias, libraries, playgrounds, busses and other surface areas. The guidance provides a general framework for cleaning and disinfection practices. The framework is based on doing the following:

1. We will identify cleaning and disinfection frequency for each facility and area type; and we will maintain logs that include the date, time, and scope of cleaning and disinfection in a facility or area.
2. Staff tasked with cleaning and disinfecting areas will be issued and required to wear PPE appropriate for the task.
3. Soiled surfaces will be cleaned with soap and water before being disinfected.
4. Surfaces will be disinfected with products that meet both the US Environmental Protection Agency EPA and the NYS Department of Environmental Conservation (DEC) criteria for use against the virus in question and which are appropriate for that surface.
5. Staff will be trained to follow instructions of cleaning products to ensure safe and effective use of these products.

The above protocols were used during the summer of 2020 in our Reopening Plan to safely reopen schools during the COVID-19 pandemic. This framework will be implemented, if appropriate, during a communicable disease public health emergency that may affect our district.

## **Employee and Contractor Leave**

Public health emergencies are extenuating and unanticipated circumstances in which **ECSD** is committed to reducing the burden on our employees and contractors. The Families First Coronavirus Response Act, for example, provided requirements related to the COVID-19 pandemic, for example, extended specific paid sick leave to employees. The **ECSD** will comply with any and all current leave requirements and benefits for our employees and contractors in accordance with New York State and federal law.

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 **ECSD**, and as such are not provided with paid leave time by **ECSD**, unless required by state and federal 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, or off-site visits.

This information may be used by **ECSD**, in association with the Erie County Department of Health (ECDOH) to support contact tracing within the organization and may be shared with local public health officials.

The use of attendance records, timesheets, daily work schedules and time clocks for the maintenance and cleaning staff will document hours and locations to support contact tracing. The Buildings and Grounds Department is responsible for managing both maintenance and the cleaning staff, along with outside contractors present inside the facilities. Any office and support staff will document their hours, areas of work and visits. The School District Offices will manage this information for contact tracing, in association with the ECDOH.

## 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. However, emergency housing is not considered to be generally required for school employees as opposed to critical healthcare or public utilities employees.

But, to ensure the health and safety of its staff and the continuity of **Eden Central School District's** essential operations, major tasks and skills needed have been identified. Staff have been cross-trained on some of these tasks and skills so that they can step in for support when needed in the event of the spread of the subject communicable disease in our community and within our staff.

If such a need arises where we need to isolate essential staff, 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 in the area, **Eden Central School District** will coordinate with the supervisor of the Town of Eden to arrange for these housing needs. The Superintendent of the School, or his/her designee, will be responsible for coordinating any housing for essential employees.