

PERSONAL PROTECTIVE EQUIPMENT¹ POLICY

In order to protect employees and students from the transmission of COVID-19, it has been necessary to adopt and implement a Personal Protective Equipment ("PPE") Policy that will remain in effect until such time as notice is provided in writing by BROOKFIELD SCHOOLS

GENERAL REQUIREMENTS

EMPLOYEES: All employees must wear cloth (or other approved) face coverings that cover the mouth and nose, while they are in the presence of another and/or others unless they are in the midst of consuming food or drink, are in water, or are outside in extreme heat and, in such case, must maintain social distancing practices while doing so.² Employees who may be expected to come in physical contact with students may be required to wear gloves, clear plastic shields that cover the face ("clear face coverings"), and/or disposable smocks, jumpsuits, or lab coats in addition to cloth face coverings. If an employee believes it would inhibit his or her health to wear a mask, the employee is required to follow the protocol in the "Accommodations for Employees" section of this policy.

STUDENTS: Students are required to wear cloth or other approved face coverings unless one or more of the following exceptions apply:

- Doing so would inhibit the student's health.
- The student is in extreme heat outdoors.
- The student is in water.
- The student's documented medical condition, or disability as reflected in an Individualized Education Program (IEP), precludes the use of face covering.
- The student is under the age of two (2), due to the risk of suffocation.

¹ As used in this Policy, and related COVID-19 policies, the phrase "personal protective equipment" or abbreviation "PPE" is intended to include cloth face coverings, clear plastic face coverings, gloves, smocks, lab coats, jumpsuits, and all other items that a person may wear in order to prevent or mitigate the risk of spread of COVID-19 or other communicable diseases. It is noted that as of July 2020, both the Occupational Safety and Health Administration ("OSHA") and the Centers for Disease Control ("CDC") expressly have excluded "cloth face coverings" and related face coverings from the federal regulatory definition of PPE, as these items are used primarily for source control (i.e., containing the spread of the virus by unknowingly infected individuals) rather than personal protection of individuals from an outside source. However, it is noted that the New Jersey Department of Education ("NJ DOE") continues to use "Personal Protective Equipment" and "PPE" inclusively in its guidance to refer to face coverings and other types of protective equipment used in schools to prevent the spread of COVID-19. To maintain consistency with the NJ DOE guidance, the term PPE is used inclusively herein as well.

- During the period that a student is eating or drinking.
- The student has trouble breathing, is unconscious, is incapacitated, or otherwise is unable to remove the face covering without assistance (e.g. face coverings should not be worn by Pre-K students during nap time).
- The student is engaged in high intensity aerobic or anaerobic activities. (Face coverings may be removed during gym and music classes when individuals are in a well-ventilated location and able to maintain a physical distance of two meters apart.)
- When wearing a face covering creates an unsafe condition in which to operate equipment or execute a task.
- At least each day, students will be permitted to take breaks from wearing their face coverings. During such breaks, students must be spaced at least two meters apart, and must be outdoors or in a room with open windows.

VISITORS: All visitors to the school will be required to wear cloth (or other approved) face coverings upon entering the premises, unless they are under the age of two. Visitors who refuse to comply with this requirement will be denied access to the premises. If a visitor believes it would inhibit his or her health to wear a mask, the visitor or a person authorized to act on his or her behalf must contact the school in advance to discuss whether an accommodation can be made.

CLEAR FACE COVERINGS

Although clear face coverings are not a substitute for cloth face coverings, they may be used by the following individuals, under the following circumstances:

- Those who interact with students or staff with disabilities related to hearing or auditory processing;
- Teachers of students learning to read;
- Teachers of students in an English as a Second Language class;
- Teachers of students with disabilities;
- Students and teachers who rely on facial cues, including but not limited to students and teachers with disabilities related to hearing or auditory processing, students receiving speech/language services, young students in early education programs, students who are learning to read, and English language learners; and

- Students with documented medical or other challenges that preclude the use of cloth face coverings.

Clear face coverings should cover the nose, wrap securely around the sides of the wearer's face, extend below the chin, and should be determined not to cause breathing difficulties or overheating.

FURNISHING OF PPE TO EMPLOYEES

Appropriate PPE will be made available to all employees. However, employees who wish to furnish their own PPE may request to do so. Management will determine whether the requested PPE is appropriate, taking into consideration applicable regulations and agency recommendations, as well as the nature of the employee's position. Employees will be responsible for regularly cleaning and disinfecting any reusable PPE that is furnished to them, or that they request to use. Employees also will be responsible for proper disposal of PPE that is not slated for reuse.

FURNISHING OF FACE COVERINGS TO STUDENTS

Families will be encouraged to furnish cloth (or other approved) face coverings to their student(s). However, appropriate disposable face coverings will be available to students who are unable, or forget, to bring their own face coverings.

STUDENT USE OF FACE COVERINGS

All face coverings must be labeled with the student's first and last name or initials, and must be marked to identify the front and back and top and bottom of the face covering.

When they are not being worn, face coverings must be stored in a container or bag with the student's first and last name on them.

Students are prohibited from swapping or sharing face coverings.

Face coverings must be washed after each use or if they become soiled.

Students or anyone assisting them must wash or sanitize hands immediately before and after putting on face coverings.

CLEANING FACE COVERINGS

Employees and students or where age-appropriate, their parents or caregivers, must ensure that the face coverings they use are washed in accordance with CDC guidance³ after each use or any time they become soiled.

ACCOMMODATIONS FOR EMPLOYEES

Employees who are unable to wear cloth (or other approved) face coverings, or other required protective equipment, for medical or disability reasons must contact Dr. Kiernan to evaluate whether reasonable accommodations can be made available to the employee.

ACCOMMODATIONS FOR STUDENTS

Students who are unable to wear cloth (or other approved) face coverings for medical or disability reasons, or who, for reasons related to a disability, are unable to receive instruction or other services effectively from an instructor or service provider who is wearing a face covering, should contact Dr. Kiernan (directly, or through a parent or caregiver), as soon as possible to explore appropriate accommodations.

ENFORCEMENT

Any employee or student who willfully refuses to comply with this policy, or who is found to be repeatedly negligent in his or her obligation to comply with this policy, may be subject to discipline.

REPORTING AND ANTI-RETALIATION

Any employee who witnesses or becomes aware of any other employee or individual's violation of or failure to enforce this policy, must report such violations to his or her direct supervisor or NEMR HR immediately. Employees who fail to report violations of this policy may be subject to discipline, up-to-and-including termination of employment.

BROOKFIELD SCHOOLS prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern.

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³ CDC guidance for washing face coverings is available here: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-to-wash-cloth-face-coverings.html>