

**Health and Safety Plans**  
**Thurgood Marshall Academy**  
**v.2023-08**

**Executive Summary**

This plan is intended to provide the stakeholders with information on how Thurgood Marshall Academy Public Charter High School (“TMA”), as a DC LEA, will support the safe operation of school buildings in relation to health emergencies. Developed in response to the COVID-19 pandemic of 2020 – 2023 and informed by guidance issued by the DC Department of Health, the policy is intended to respond to communicable disease outbreaks and related issues during future pandemics and during normal operations. Many measures can be adapted to other emergencies; by way of example only, face mask policies and procedures (e.g., supply masks) can be implemented during periods when outdoor air quality is hazardous.

A pandemic is a dynamic and lengthy crisis. This guidance, therefore, is subject to changes—both temporary and permanent—by the Executive Director of TMA. No guide can encompass all elements of pandemic response—TMA will communicate new or additional steps and policies to the school community in the normal course of business through its normal communication channels (such as an auto-dialer alert to families and email to employees).

In general, TMA follows guidance of the US Centers for Disease Control (“CDC”), US Food & Drug Administration (“FDA”), and/or DC Department of Health (“DOH”) as relevant. The Health and Safety Plans respond to DC DOH and CDC guidance on topics including but not limited to: vaccination; staying home when sick; communicable disease testing; case response and communication (e.g., re: isolation/quarantine); hand hygiene and respiratory etiquette; ventilation; and cleaning and disinfection. TMA monitors changes in guidance and adjusts operations accordingly. The school reserves the right to interpret guidance and implement recommendations by these authorities as best fits the school community and specific issues (noting that the school will implement mandatory public policies).

Thurgood Marshall Academy’s approach to pandemic response—consistent with current DC guidance—is to implement pandemic responses suited to the school community’s needs and to the extent feasible while delivering effective in-person instruction.

**The norm will be to implement a variety of disease response measures that complement instruction:**

- Masks wearing optional whenever appropriate
- Strategic shifts to mask mandates when needed, communicated in the same manner as snow days
- Breakfast in cafeteria and/or classrooms as determined by school leaders
- Regular cleaning and disinfection
- Vaccination of students as directed by DC OSSE
- Stay-home-when-sick policies and support

**Additional measures during outbreaks, initiated by school leadership, can include:**

- Lunch socially distanced to the extent feasible
- PPE available in classrooms and upon request
- Air purifiers in classrooms complementing high-quality central HVAC system
- Vaccination requirements for employees and visitors
- Test-to-stay and other diagnostic testing procedures for those with symptoms or close contact (as applicable per vaccination status)
- Designated health workers to provide, among other duties, contact tracing, guidance to those exposed to illness regarding isolation and quarantine when needed, etc.
- A central means to report cases, PPE needs, or other information, such as a special email address.
- Facility-wide social distancing and other intensive responses should conditions and city policies dictate.

## Face Masks

TMA will implement one of three mask-wearing policies, described below, as best fits circumstances as assessed by the Executive Director or her/his delegate (such as a health coordinator).

Mask policies refer to wearing non-medical face covering. In general, an N95 mask (a.k.a. respirators) is optimal, but surgical masks are acceptable, particularly if double-masked, unless health officials indicate otherwise. Bandannas, neck-gaiters, and other ad hoc face coverings are less than optimal.

### *Mask Optional*

Mask-Optional policies indicate that individuals can choose to wear a mask or choose not to wear a mask, either inside the facility, on the grounds, or both. It is the policy of TMA that no student, employee, visitor, or other member of the community will be discouraged from or harassed for choosing to wear a mask. Mask-Optional policies will be the norm when community transmission rates are Low or Medium as monitored by the CDC (or comparable condition should there be changes in national monitoring).

### *Indoor Mask Mandate*

An Indoor Mask Mandate communicated by school leaders means that except during specific circumstances (e.g., while eating) when mask wearing is impossible, all students and adults, including those who are partially or fully up-to-date on vaccinations, must wear masks at all times while indoors in any school facility, on school buses, and while participating in any school-related indoor activities, including physical education and sports. To the extent permitted by law, TMA's Executive Director or his/her delegate will make a case-by-case determination on whether, when, and where an Indoor Mask Mandate is needed. In some cases, the school may determine that an Indoor Mask Mandate is not warranted despite CDC recommendations, and in other cases TMA may determine an Indoor Mask Mandate is needed even when CDC does not list community transmission rates as high.

### *Complete Mask Mandate*

A Complete Mask Mandate is the same as an Indoor Mask Mandate but applies also to outdoor activities. Implementation of a Complete Mask Mandate will be made at the direction of the Executive Director responding to changes in local/national policy or specific conditions at the school.

TMA reserves the right to alter masking requirements to suit particular emergencies, and the modes described above are intended to support, not prohibit, effective use of face masks. By way of example only, school leaders could require all students and adults to wear masks, but only outside, when wildfire smoke makes outside air hazardous.

TMA will communicate mask-wearing expectations as it communicates other school expectations—through school-home communication, via emails to employees, and/or via verbal professional development presentations, etc. By way of example only, a shift to high community transition level could lead to an Indoor Mask Mandate that could be communicated via the school's auto-dialer system and via email to staff in the same manner the school communicates snow days and other emergencies. Leaders of events (e.g., after school programs, PTO meetings, etc.) will supervise pandemic responses, including but not limited to mask wearing, to the greatest degree feasible. The school intends to maintain a supply of PPE in support of health emergencies, but failure to provide masks to an individual, to groups, or over an extended period shall not be deemed a breach of school policies (unless otherwise required by law).

When masking is mandated, staff members overseeing response will be responsible for reminding employees and students to wear masks properly. During periods when mask wearing is required by TMA, the school will take the following measures: (1) A student unwilling to wear a face mask will meet with a Student Affairs Coordinator (practicing appropriate social distancing) to discuss the problem and seek an appropriate accommodation. (2) An employee, contractor, or visitor who is unable or unwilling to wear a mask will be asked to leave the campus/activity. (3) If the instance warrants and to the extent feasible, school representatives will follow up with the person who didn't wear a mask to plan a workaround. By way of example only, employees may be referred to HR to begin a formal accommodation request, if applicable, and a parent may receive a call from a Student Affairs Coordinator to discuss the matter.

## **Social Distancing**

TMA will implement social distancing as best fits circumstances as determined by the Executive Director (following local or national laws when in force).

The norm will be to implement, when necessary, social distancing efforts easily integrated into instruction and operations to achieve the goal of balancing effective instruction with public health practices.

The school is prepared to implement additional social distancing measures should the Executive Director determine they are necessary in response to needs of the school community or changes in local/national mandates. Such additional measures may include the following:

- In classrooms, desks can be spaced to the extent feasible so that student seats will be 3 feet from one another and at least six feet from the teaching area (usually the area in front of a whiteboard).
- Decals and signage can be placed in common areas remind users to remain 6 feet apart.
- Lunch supervisors, Programs staff, and coaches can work to maximize feasible social distancing during extracurricular and physical activity.
- Providing meal areas (such as tents) in addition to the cafeteria during cold weather (noting that setting up alternate meal areas can entail lead time).

## **Cohorts**

TMA can when necessary create cohorts to the extent feasible by maintaining a cohort for each grade level. Students are used to congregating by grade in certain parts of the building, as lockers and classes typically cluster in the same area (e.g., 9th-grade lockers and classes typically on the 2<sup>nd</sup> floor, including before the pandemic). Since teachers and staff also typically serve a grade level (e.g., 9<sup>th</sup> grade subject-area teachers), the school's existing culture paired with social distancing messaging can limit cohort mixing.

## **Handwashing, Hygiene, and Respiratory Etiquette**

TMA's policy supports handwashing and respiratory etiquette, including frequent, proper handwashing strategies and encouraging covering coughs and sneezes. Signage can reinforce frequent, proper handwashing strategies by staff and students with soap for at least 20 seconds. TMA provides hand sanitizer that contains at least 60 percent alcohol in public areas throughout the school. All students and staff will have the opportunity to wash hands, either with soap and water for at least 20 seconds or, if not readily available or would compromise cohort isolation practices, hand sanitizer with 60% alcohol at the following times:

- Before and after eating;
- Before and after group activities or student centers;
- After going to the bathroom;
- After removing gloves;
- After blowing noses, coughing, or sneezing.

Signage can support respiratory etiquette, including covering coughs and sneezes and (when relevant) proper mask use. The building's excellent HVAC system further supports respiratory etiquette.

TMA's building and the cleaning contractor support high quality and quantities of hygienic supplies irrespective of pandemics. The school has always ensured that restrooms and kitchens are well stocked with soap and paper towels, classrooms and offices have tissues, and other hygiene products (e.g., gloves for food service) are well stocked. These routine supplies are checked throughout the day and restocked at night by the school's cleaning contractor. TMA may also maintain hygiene equipment, such as hands-free faucets and soap dispensers in bathrooms. These will be stocked on a nightly basis by our custodial contractor. The Operations department and the school's janitorial service ensure an adequate supply of cleaning products, hygiene products, and (when needed) personal protective equipment (see below) as part of standard operations.

## **Personal Protective Equipment (PPE)**

Thurgood Marshall Academy's policy is to provide Personal Protective Equipment (PPE) as appropriate to occupants' roles, and procedures for distributing PPE varies depending upon roles. By way of example only, food servers have access to gloves and science classes access goggles. Cleaners wear gloves and appropriate clothing, as managed by janitorial contractor supervisors. TMA has installed partitions between restroom sinks and public locations for an added element of protection for occupants (note that Thurgood Marshall Academy sinks are ADA accessible, and PPE does not interfere with accessibility).

Additional PPE measures can be implemented when directed by school leadership in response to a health emergency and as local and national supply chains permit: Masks (non-medical face coverings) can be provided to occupants who needs them at the front security desk. Teachers can distribute PPE to students, and Operations can provide via PPE bins in each classroom that contain masks, paper bags for storing masks if eating, alcohol wipes to clean objects (pens, keyboards, etc.), and gloves. Face and desk shields can be available for rare occasions when masks (when required) cannot be worn (such instances are expected to be rare but might include speech/language work).

## **Maintain Clean and Healthy Facilities**

TMA contracts with a janitorial service company that cleans the entire building nightly and posts at least one day-porter on campus for continuous cleaning throughout the school day. TMA maintains a schedule for routine cleaning of rooms, surfaces and objects, including high touch objects and surfaces. TMA and its janitorial service follow appropriate DC guidance for disinfecting areas following a known case of communicable diseases. TMA may implement additional disinfection steps (e.g., nightly electrostatic disinfection) during times of special need, such as flu season.

## **Ventilation (HVAC) System & Practices**

TMA maintains an excellent, modern HVAC system. The school discourages opening windows, as that defeats filtering and UV-C air disinfection provided by the system.

Furthermore, in consultation with experts, TMA has planned or implemented several improvements to its building's HVAC system since 2020. While the school had a high-functioning system before improvements, TMA adopted changes that both responded to pandemic and promoted general wellness:

- Installed MERV-13 filters in the system.
- Worked with a balancing contractor to confirm air circulation met or exceeded the six (6) air changes per hour recommended by experts.
- Installed germicidal UV-C lighting in central ductwork.

TMA's building engineers perform regular periodic maintenance (e.g., changing filters, checking fans, and monitoring performance), and key machinery (e.g., the chiller and air handlers) receives roughly monthly inspection via a maintenance contract.

During and following health emergencies, as directed by school leaders, TMA can take additional, temporary measures, such as placing in classrooms and high-traffic common areas free-standing UV-C air purifiers.

## **Stay Home When Sick Policies**

It is TMA's policy—and TMA will communicate to students, employees, contractors, and stakeholders—that individuals should stay home when experiencing any illness. In particular, stakeholders must avoid school buildings and school activities (except online activities) when experiencing symptoms associated with a communicable disease.

Existing TMA and DC student-excused-absence and employee-sick-leave policies are expected to cover communicable disease related absences, and the school will assess if changes are needed.

## **Response to a Confirmed or Suspected Communicable Disease Cases—Contact Identification**

Thurgood Marshall Academy will not admit, or will dismiss if already attending, any student, staff member, or visitor—and the school will follow the applicable DC Health guidance for isolation or quarantine—if an individual has tested positive for a serious, communicable illness such as COVID-19. When indicated and

supported by health authorities, the school will use Test-to-Stay procedures to assess individuals displaying symptoms of communicable disease or who were exposed to communicable disease (detailed below).

Designated school health and safety staff work with the school nurses to stay current on exclusion criteria and assess communicable disease information. During health emergencies, the health coordinator, nurse, and other designated health staff conduct contact tracing/contact identification, health reporting and other case response.

#### *Isolation Rooms & Isolation Outdoors*

Room 218 and the First Floor Conference Room can be staged quickly as Isolation Rooms during health emergencies. Other rooms can also be set up for isolation if needed. Both the primary Isolation Room (218) and the secondary Isolation Room (the conference room) are close to a restrooms and have glass doors so an observe can sit outside the room and still observe and ill individuals. Negative-pressure fans are stored in engineering areas and can be installed to vent the rooms' air outside. Signage communicates the potential use of the rooms as Isolation Rooms and explains procedures. Leaders may, when necessary, also guide ill individuals to isolate outside—particular on picnic benches in the fenced courtyard—if weather permits, and will notify cleaners to disinfect surfaces after the ill individual departs.

### **Points Of Contact & Communication**

During a health emergency, TMA can establish an email group (e.g., COVIDhelp@tmapchs.org), for reporting cases by students, teacher PPE requests, and other needs. A health coordinator can work with the nursing staff on case response, including but not limited to reporting to DC DOH when required. The pandemic oversight point of contact will be designated by the Executive Director or the Chief Operating Officer.

### **Communicable Disease Exposure—Test-to-Stay, Test-to-Return & Screening**

In the case of a public health emergency, when permitted and supported by health or education authorities, TMA will deploy strategies to balance in-person instruction and public health. While strategies will vary based on the emergency, two effective past practices were Test-to-Stay and Test-to-Return. School leaders may also maintain these strategies in the absence of a public health emergency when they determine it is prudent and feasible.

#### *Test-to-Stay*

During a health emergency, TMA may implement *Test-to-Stay* procedures that use health tests, such as rapid antigen tests, to assess whether a symptomatic person or a person exposed to a communicable disease tests positive for the condition, and to implement appropriate isolation for positive cases and continued testing for negative results. School health workers will monitor DC DOH guidance, but in general Test-to-Stay procedures are as follows:

- In general, formal Test-to-Stay procedures apply to those who are not up-to-date on vaccinations (including boosters); those who are up to date on vaccination monitor for symptoms and take a tests as advised by their healthcare providers or other authorities.
- If an employee, student, or stakeholder is not up to date on vaccinations or otherwise immune per health experts, they Test-to-Stay as follows:
  - Take an appropriate test within 24 hours of exposure and submit the result to TMA or DC DOH if the city has provided a reporting mechanism.
  - Take another rapid test 5-7 days after exposure, or as indicated by health experts, and submit the result via the same method.
  - Until 7 full days from last exposure, they will be required to wear their mask and socially distance at all times (if those steps are not required of all people in school at a given time).
  - They will not be permitted to attend any extracurricular activities or any classes that are shown to be “high-risk” (gym, athletics, band, dance, etc.) during Test-to-Stay. When out of school, the DC Dept. of Health requires that they quarantine at home.
  - If at any point they test positive or develops symptoms, DC DOH will require that they isolate at home, or take other measures defined by DC DOH.

- If exposed stakeholders are not up to date on vaccinations and are not able to follow the Test-to-Stay guidelines, subject to guidance from health authorities, they will be required to quarantine at home until the quarantine period ends. (In the case of COVID-19, for example, if an antigen test was taken 5-7 days after exposure [with the date of symptoms/exposure as “day zero”] and the result is negative, they will be permitted to return on day 8.)
  - If no test is taken, they will have to quarantine at home until health guidelines indicate they can return the following day.
  - If they test positive or develops symptoms, they will need to isolate at home and contact the school for isolation instructions including a new return to school date.

### *Test-to-Return & Screening Testing*

During a public health emergency, to the extent feasible based on logistics and resources, TMA may implement *Test-to-Return* procedures under which all students and/or employees provide rapid antigen test results prior to returning from long breaks and the like.

TMA will participate, as feasible, in city-wide, city-sponsored *Screening Testing (a.k.a. surveillance testing)* procedures under which a percentage of the school community tests periodically (e.g., weekly).

TMA may also, when the Executive Director determines it is feasible, provide space on campus to a business or community service that provides tests to the general public.

School leaders will determine whether a testing program requires a CLIA waiver permitting administration of diagnostic tests under the oversight of a lab director, and will direct staff to secure waivers if required,

## **Vaccinations**

Students must comply with DC “No Shots No School” (or comparable) vaccination requirements. Employees and all stakeholders are strongly encouraged to stay fully up to date on vaccinations by getting recommended and optional boosters. The school reserves the right to require vaccinations and collect vaccination records from any student or adult when permitted or required to do so by law and health authorities. The school may collaborate with partners to offer on-site vaccination events if they can be coordinated with enough participants.

## **Students with Disabilities**

During a health emergency, to the greatest degree feasible, Thurgood Marshall Academy, in an effort led by the Director of Special Education, will maintain IDEA timelines and compliance in collaboration with families. The school will seek to schedule meetings at least 30 days prior to the due date to accommodate the parent schedule and will seek to reach an agreement with parents on extensions of procedural timelines when possible. The LEA will continue to communicate with parents regarding evaluations (initial and reevaluation), IEP meetings, complaint resolution meetings or due process hearings, including but not limited to any unforeseen circumstances related to a pandemic. For procedural timelines that were delayed due to pandemic, parents will be informed of anticipated timeframes of completing delayed activities as early as feasible (i.e. initial or re-evaluations). The LEA will, to the extent feasible, issue prior written notification to parents documenting any changes. Students with disabilities—like all students—are issued a dedicated Chromebook and are provided to the extent feasible with additional tools to accommodate their particular needs when using devices.

## **Training & Communications**

Thurgood Marshall Academy plans to provide employees, students, and families with training and technical assistance—as appropriate given the presence or absence of a public health emergency—at the start of the school year. Student Affairs Coordinators may inform students about health and safety plans and procedures during student orientations. Operations staff, may train employees, and contractors may be trained during TMA’s roughly two-week “Warrior Academy.” Training will likely cover the day-to-day implementation of the guidance detailed in this plan, likely emphasizing expectations, avoiding travel when feeling ill, and

contingencies. Following start-of-year orientations, Thurgood Marshall Academy will reiterate pandemic response topics as appropriate and necessary in exiting venues, such as student grade-level meetings, school-home communication, and all-employee meetings.

Thurgood Marshall Academy will communicate key health and safety policies by posting this plan on the school website, and in the normal course of business. Updates, when necessary, will be communicated via email and school-home communication.

**END OF HEALTH & SAFETY PLANS**