



MARLBOROUGH PUBLIC SCHOOLS
2020-21 School Year
COVID19 Employee Protocols & Guidelines



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Introduction

Dear Marlborough Public Schools Staff:

Marlborough Public Schools (MPS) cares about the health and safety of our employees. During the COVID-19 pandemic, the District is taking steps to mitigate the outbreak and will continue to do so moving forward as the reopening of schools takes place.

The district is required to submit plans for 3 different education delivery models to the Department of Elementary and Secondary Education (DESE) for re-opening. These models included, full in-person instruction, full remote instruction and a hybrid mix of live and remote instruction. On July 28, 2020, the Marlborough School Committee voted to support the Superintendent Bergeron's recommendation of the Hybrid Model for the 2020-21 School Year.

In doing so, employees need information on expectations for in-person instruction and what to do regarding those expectations. The Protocols & Guidelines in this Plan provide that information. Please keep in mind, they are not intended to be fully exhaustive of all possible scenarios. These are in-person work habits that must be developed and maintained for safety reasons. Learning about them as early and as often as possible is meant to help you be prepared.

Administration is working closely with the Marlborough Health Department and monitoring guidance coming from DESE and the CDC. As changes take place, we will continue to work with our unions and other members of our school community as necessary to adjust to the best of our ability.

You will have questions and concerns as you read this, undergo training or read safety signage. I encourage you to ask these questions, as many and often as necessary to gain clarification and understanding. I also welcome your feedback and suggestions as we move forward together.

Sincerely,
Patricia Brown
Director of Human Resources

Physical Distancing

All staff must maintain a physical distance of 6' when possible and 3' at a minimum. During the school year, student desks will be 6' apart, facing the same direction. Teacher desks may face student's desks with a minimum of 6' distance. Where there are tables rather than desks, chairs maintain the same spacing as above.

Employees must remain at least 6' apart from one another, including in the parking lot. While everyone is encouraged to take meals at their desks and/or workspaces, alternate areas with staggered break/mealtime schedules should be observed to reduce the number of employees and/or students in break rooms and cafeterias or other common areas at any one time.

Workplace Layout

Food and Break Rooms

MPS will limit unnecessary staff and visitors from food service areas and will encourage employees to bring their own insulated lunch box/bag with an ice pack or hot food items in a thermos, if possible, to limit use of common refrigerators and microwaves. Food should be removed from common areas and kitchen or break areas at the end of each day.

If eating with others, employees must maintain 6' of separation from others, face the same way and only remove masks in order to eat. Outdoors may be better than indoors for breaks - weather, space and distance permitting.

Employees should consider using disposable plates, cups, cutlery, etc. or take such items home every day to wash rather than using common sinks to wash personal items at work.

Lactation Spaces

All touched areas in lactation spaces must be wiped down by users prior to leaving each time. A spray bottle and paper towels will be provided to ensure thorough sanitization protocols for the next user. Any table surfaces, arms of chairs, etc. touched or breathed upon without a mask must also be wiped down before departure.

Other Layout Considerations

MPS will evaluate workplace layouts and consider making certain stairways and hallways one way if social distancing guidelines cannot otherwise be met. When 6' distance cannot be maintained with 3' as a minimum, or glass is not already in place in reception areas, MPS may institute plexiglass shields, signage, floor markers, tables or other barriers to block airborne particles and ensure minimum distances in the workplace. Signage will also be provided to avoid crowding in elevators.

Furniture or work equipment may be reconfigured to facilitate social distancing. For example, removing tables and chairs in meeting, lunch or break rooms may facilitate social distancing and compliance with the CDC guidelines of at least 6' of distance between seats. Please remember

that mealtime, where a mask may be removed to eat, requires at least 6' distance as opposed to 3' minimum. MPS reserves the right to regulate the number of individuals eligible to be present in one place. Meeting sizes must also be limited, when possible. Virtual meetings or conference calls should take place rather than in person meetings when practicable and possible. MPS will designate assigned working areas to individuals and in general, employees are encouraged to minimize non-essential movement around buildings.

Supervisors and managers are instrumental in the planning, coordination and identification of workplace layouts and should be engaged in that process.

All changes will be balanced against maintaining appropriate building security.

Where feasible and appropriate, MPS will consider which employees may be able to continue to work remotely (including the duration of such remote arrangements) and those who need to be in the workplace. Remote work arrangements will not always be possible during the pandemic and any teleworking practices during the pandemic will not be deemed precedent setting.

Learn more about social distancing on the CDC website.

Meetings

In general, congregation of staff will be discouraged. If in-person meetings are necessary, they will be conducted in a manner consistent with social distancing requirements. Masks must be worn during in person meetings for staff and 6' distance must be maintained. The cleaning of meeting spaces between users should take place throughout the workday.

Employee Interactions

MPS encourages employees to avoid hand shaking, hugs, back slaps and other forms of physical contact in which people may engage out of long-standing habit and instead employ hand waves or other such gestures that signal positivity without touching each other. Employees must limit travel between offices, classrooms, floors, and between buildings. Where feasible, individuals will be designated to a specific work site, and even a location within that work site, to allow for greater accuracy in contact tracing should an employee become ill.

Accountability

Employees are encouraged to hold each other as well as students and other adults accountable to safety protocols. If an employee observes a lack of compliance, they should respectfully and swiftly speak up when possible. If it is not possible to speak up directly or another adult does not comply when asked, such information should be directed to a supervisor immediately. The supervisor, in turn, should address the offending party discreetly and avoid disclosing the complainant's name if possible. Failure to comply in the future may result in the disciplinary process, which shall be subject to School District policies and Collective Bargaining Agreements rights.

Quick reference sheet: Key actions for individual COVID-19 events

Event	Location of Event	Testing Result	Quarantine
Individual is symptomatic	<p>If an individual is symptomatic <u>at home</u>, they should stay home, quarantine and get tested.</p> <p>If an individual student is symptomatic <u>on the bus or at school</u>, they should remain masked and adhere to strict physical distancing. Students will then be met by the nurse and stay in the medical waiting room until they can go home. They should not be sent home on the bus.</p> <p>If an individual staff member is symptomatic at school, they should notify a supervisor to ensure student supervision coverage and then go home, quarantine and get tested.</p>	Individual tests <u>negative</u>	Return to school once asymptomatic for 24 hours
		Individual tests <u>positive</u>	Remain home (except to get medical care), monitor symptoms, notify the school, notify personal close contacts, assist the school in contact tracing efforts, and answer the call from local board of health or MA Community Tracing Collaborative. Most people who have relatively mild illness will need to stay in self-isolation for at least 10 days from symptom onset <u>and</u> until at least 24 hours have passed with no fever and improvement in other symptoms <u>and</u> receive clearance.
		Individual <u>is not tested</u>	Remain home in self-isolation for 14 days from symptom onset
Individual is exposed to COVID-19 positive individual	<p>If an individual is <u>at home</u> when they learn they were in close contact with an individual who tested positive for COVID-19, they should continue to quarantine and stay at home and be tested 4 or 5 days after their last exposure.</p> <p>If an individual is <u>at school</u> when they learn they were in close contact with an individual who tested positive for COVID-19, they should be</p>	Individual tests <u>negative</u>	Quarantine for 14 days from the time of contact. (last exposure)
		Individual tests <u>positive</u>	Remain home (except to get medical care), monitor symptoms, notify the school, notify personal close contacts, assist the school in contact tracing efforts, and answer the call from local board of health or MA Community Tracing Collaborative. Most people who have relatively mild illness will

	<p>masked, go to the nurses' office to the medical waiting room to be picked up. They should not take the bus home. Employees can drive themselves if able.</p>		<p>need to stay in self-isolation for at least 10 days from test or symptom onset and until at least 24 hours have passed with no fever and improvement in other symptoms and receive clearance.</p>
	<p>They should then quarantine and stay at home and be tested 4 or 5 days after their last exposure.</p>	<p>Individual <u>is not tested</u></p>	<p>Remain home in self-quarantine for 14 days from exposure.</p>

Protocols

People infected with COVID-19 have experienced a wide range of symptoms – ranging from mild symptoms to severe illness. Symptoms may appear 2-14 days after exposure to the virus. Certain measures are needed to reduce the risk of exposure and spread of COVID-19. An individual can spread COVID-19 to others even when not feeling sick.

Staying Home When Sick

Employees must monitor themselves daily before coming to school and **stay home if they feel sick** with the following and notify the school COVID19 point of contact as soon as possible. In addition to notifying the COVID19 point of contact, the district absence management system – AESOP has a COVID code that employees should use to code potential COVID-related absences. Employees using timesheets should note COVID19-related for such absences.

- Fever (100° Fahrenheit or higher)
- Chills or shaking chills
- Cough (not due to other known cause, such as chronic cough)
- Difficulty breathing or shortness of breath
- New loss of taste or smell
- Sore throat
- Headache when in combination with other symptoms
- Muscle aches or body aches
- Nausea, vomiting, or diarrhea
- Fatigue, when in combination with other symptoms

- ❑ Nasal congestion or runny nose (not due to other known causes, such as allergies) when in combination with other symptoms
- ❑ Other less common symptoms can include rash, inflammatory conditions such as “COVID toes,” and thromboembolic events.

If an employee has any of the symptoms as noted above, he/she must get a test for active COVID-19 infection and remain at home until the test result is available in which case, the following protocols must be followed:

Test Sites

A [list of test sites is available here](#) or at <https://www.mass.gov/info-details/about-covid-19-testing#where-can-get-a-test?> and Massachusetts also has an [interactive testing map](#) at that site. Staff and students who have symptoms should also contact their primary care physician for further instructions.

If an employee tests positive for COVID19, the employee must remain at home (except to get medical care), monitor their symptoms, notify the school, notify personal close contacts, assist the school in contact tracing efforts, and answer the call from local board of health or Massachusetts Community Tracing Collaborative.

Employees who test positive will need to stay in self-isolation. Employees who test positive can return to in-person work at school after 10 days and once they have:

- a) gone for **24 Hours** without a fever (and without taking fever-reducing medications like Tylenol); and
- b) experienced improvement in other symptoms (for example, their cough has gotten much better); and
- c) received clearance from public health authority contact tracers (the local board of health or Community Tracing Collaborative) **or received clearance from their Doctor**

At this time, repeat testing prior to return is not recommended. Return to school should be based on time and symptom resolution. Written clearance from the public health authority contract tracers **must** be provided by the employee to MPS before the employee returns to any in-person work in a school building, **or a clearance from a Doctor**.

Counting **10 days / 24 hour** intervals for a positive case:

10 days of isolation begins when the individual who tested positive experiences onset of symptoms.

The 24 hour period is no earlier than the last 3 days of the 10 day isolation, and is without fever reducing medications such as Tylenol.

Example: If an individual develops symptoms, regardless of when tested, they may return on the 10th day provided that they have had no fever on days 7-10 after symptom onset and

have had improvements in other symptoms. The duration may be longer than 10 days if a fever persists or symptoms do not improve.

An employee tests negative for COVID19 after symptomatic:

The employee must follow the guidance of his/her medical provider and remain home until symptom free for at least 24 hours unless able to provide written clearance to return by a medical provider sooner than 24 hours after symptom free. Some medical clearance to return may be dependent upon medical circumstances of the individual as determined by his/her medical provider (e.g., allergies, asthma other non-COVID19 related illness).

Guidance for Household Member Situations (symptomatic, positive test or close contact notified)

If a member of an employee's household becomes symptomatic, the employee should get in touch with a medical care provider for guidance. MPS may request that the employee stay home and get tested and return to work with proper guidance from the local board of health unless the employee receives a positive test and/or begins to experience the above symptoms (See Section Above titled – “Staying Home When Sick”).

If a member of an employee's household tests positive for COVID19, as “a close contact,” the employee must stay home **and quarantine for 14 days**, follow the guidance of the medical professional involved in the household member's case, be tested for COVID19 and follow the steps above pending the outcome of the test result.

If a member of an employee's household is identified as a close contact for another individual who tested positive for COVID19, the employee may or may not be asked to stay home and be tested depending on the circumstances of the household member's close contact experience and the board of health guidance and DESE guidance at the time of notification.

Personal Protective Equipment (PPE)

Masks

Adults, including educators and staff, are required to wear masks in school and in any school parking lot unless in a school designated mask break area during a mask break. Staff may choose to wear their own mask or one provided by the school. The District will provide personal protective equipment (“PPE”) to all staff with PPE required in addition to masks for their particular jobs. For wearing masks:

- Masks should fit snugly against the side of your face;
- It should be secured with ties or ear loops;
- It should have multiple layers of fabric;
- It should allow for breathing without restriction;
- Fabric face coverings should be cleaned after each use and should be machine washable and dryer safe;
- Always remove the mask directly into the laundry or trash and then immediately wash your hands;

- Be careful not to touch your eyes, nose, or mouth when removing your mask. Instructions for how to fashion a homemade face covering with no sewing required can be found at [here](#).

Masks must be worn at all times in all common areas and shared spaces in buildings (including but not limited to hallways, breakrooms, copy rooms, classrooms, etc.) except at a workstation/private office that is in an enclosed space where no other personnel are present.

Employees who work in open or shared workspaces without sufficient partitioning should wear masks while at their workspace. Custodial staff will be required to wear gloves for cleaning and disinfecting purposes. At no time should a staff member be without a face covering when 6' physical distancing is not possible. Again, shared workspaces require masks even when 6' distancing is possible with the exceptions specifically noted above regarding office spaces.

For staff of the hard of hearing and deaf, clear masks might be an alternative consideration as requested. Please contact the office of Human Resources if you want to request this alternative as an accommodation (see below).

Exceptions for wearing face masks

Such exceptions include situations that may inhibit an individual from wearing a face mask safely. These may include, but are not limited to:

1. Individuals who cannot breathe safely with a face covering, including those who require supplemental oxygen to breathe;
2. Individuals who, due to a behavioral health diagnosis or an intellectual impairment, are unable to wear a face covering safely; and
3. Individuals who need to communicate with people who rely upon lip-reading. In such cases, staff may be provided with additional protective gear (i.e. clear masks) to reduce the spread of COVID-19.

If a staff member cannot wear a mask due to a disability, they should promptly contact the Patricia Brown (508-460-3509), Director of Human Resources to discuss potential accommodations.

Mask breaks should be taken throughout the day. Information will be provided at the school level regarding location, duration and frequency of mask breaks.

Gloves

Except as specified below, staff will not be required to wear gloves throughout the day but rather, are required to practice hand hygiene (see section below).

It's important to note that Staff will wear gloves when appropriate and at all times during the following activities: diapering; food preparation; and any screening activities requiring physical contact. MPS will consult with a child's medical records and identify any allergies when determining the type of gloves to use. Handwashing or use of an alcohol-based hand sanitizer before and after these procedures will always be required. To reduce cross-contamination, disposable gloves should always be discarded after the following instances.

Gloves should be discarded when there is visible soiling or contamination with blood, respiratory or nasal secretions, or other body fluids occur, as well as if there are any signs of damage (e.g.,

holes, rips, tearing) or degradation. Gloves should not be worn for more than four hours of continuous use. Previously removed gloves should not be re-donned as the risk of tearing and contamination increases; therefore, disposable glove “re-use” should not be performed. In addition, gloves should be removed immediately following activities where glove usage is required for diapering, food preparation, and screening activities requiring contact.

Staff members who anticipate wearing gloves for specific types of work described above as part of their job, and who have allergies to any types of materials (i.e., latex) must notify the nurses office in advance so alternative material gloves can be provided.

Hygiene – Handwashing

All staff must engage in frequent handwashing, including upon arrival, before and after meals, after bathroom use, after coughing or sneezing, and before dismissal. Routine protocols will be established for effective handwashing in which individuals use soap and water to wash all surfaces of their hands for at least 20 seconds, wait for visible lather, rinse thoroughly, and dry with an individual disposable towel. If handwashing is not available, hand sanitizer with at least 60 percent alcohol content can be used. Hand sanitizer will be available throughout each building.

Other key times for employees to clean their hands include:

- Before and after work shifts
- Before and after work breaks
- After blowing nose, coughing, or sneezing
- After using the restroom
- Before eating or preparing food
- After putting on, touching, or removing cloth face coverings

Employees must avoid touching own eyes, nose, and mouth with unwashed hands and cover mouth and nose with a tissue when coughing or sneezing or use the inside of elbow.

Learn more about [handwashing, coughing and sneezing](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html) etiquette on the CDC website at <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>.

Cleaning Procedures

Employees will be encouraged to practice routine cleaning and disinfection of frequently touched objects and surfaces such as workstations, keyboards, telephones, office/classroom handrails, and doorknobs at the start and end of the workday. Disinfectant will be provided by the District. Dirty surfaces can be cleaned with soap and water prior to disinfection if needed.

Employees are discouraged from using other employees’ phones, desks, offices, or other work tools and equipment, when possible. If they must use shared/common equipment, employees are expected to clean and disinfect them after use. Cleaning supplies will be provided by the district in the area of these items (e.g, near shared copy machines). General Cleaning will also be performed by custodial staff on a daily basis.

Before an employee leaves any room in which they have been working, they must wipe down their shared touch point work area with MPS-provided disinfectant. This includes shared space or equipment (e.g., copiers, printers, computers, keyboards, mouse, phone, equipment, desks and tables, etc.) as coordinated with others working in the same space. Those sharing spaces are expecting to discuss their plans proactively together.

The district will promptly close off school areas visited by the COVID-19 positive individuals until such areas can be appropriately cleaned and disinfected by custodial staff.

Limited Sharing

Employees will do their best to limit sharing among students by keeping each child's belongings separated from others' and in individually labeled containers, or areas; and ensuring adequate supplies to minimize sharing of high touch materials to the extent possible (art supplies, equipment etc. assigned to a single student) or limiting the use of supplies and equipment by one group of children at a time and clean and disinfect between use. Students will be discouraged from sharing electronic devices, toys, books, and other games or learning aids.

If food is offered at any event, MPS will provide pre-packaged boxes or bags for each attendee instead of a buffet or family-style meal, and there will be no sharing of foods and utensils. Meal counting systems that reduce contact will be encouraged where possible. MPS may consider temporarily limiting certain foods or foodservice processes they think may lead to enhanced pathogen distribution.

School Cleaning and Disinfecting

MPS has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas as noted above. In addition, the district is hiring additional staff to assist in additional daily cleaning disinfecting throughout the buildings during the COVID19 crisis.

Common rooms and break/lunchroom areas will be cleaned and disinfected daily. Employees performing cleaning will be issued proper PPE. All bathrooms will be cleaned and disinfected frequently and regularly throughout the day; this includes cleaning all frequently touched fixtures, stalls, and mopping of the floors. Additionally, custodians have been directed to check on every bathroom regularly throughout the day for unsanitary conditions, a key protocol for when school is in session. Disinfecting is a key component of bathroom maintenance. All touch surfaces are wiped down with our district supplied disinfectant whenever bathrooms are serviced by the custodial staff. If a bathroom is found to be overly unsanitary during the day, it will be closed for immediate cleaning.

In addition to disinfecting elevators daily, custodians will be disinfecting all touch surfaces such as doors, handles, push plates etc. several times a day. Any trash collected from the school will be changed frequently.

MPS will ensure that hand sanitizer dispensers are filled. Supervisors and managers will assist in identifying the location(s) of such dispensers. Employees are encouraged to notify a supervisor, manager or member of the custodial staff when they notice a supply is out.

Equipment/tools should be cleaned before change in the employee using them. Employees using such equipment/tools should be involved in cleaning between individual usage.

MPS will ensure ventilation systems operate properly and will seek to increase circulation of outdoor air as much as possible by opening windows and doors, using fans, or other methods, provided doing so does not pose a health risk and does not reduce ventilation. Some school ventilation systems are dependent upon drawing air in and out of buildings and particular open windows could lessen the effectiveness of ventilating the school. Please rely on guidance at the building level regarding schools or areas of a particular school building that have these systems in place.

MPS will thoroughly clean and disinfect those areas of the location that a confirmed-positive individual may have contacted in accordance with CDC guidelines, and it will do so before any employees can access that workspace again. Employees will receive appropriate communication.

MPS will maintain Safety Data Sheets of all disinfectants used on site per OSHA requirements.

Staffing and Operations

Responsibilities of Administrators, Managers and Supervisors

All administrators, managers and supervisors must be familiar with these Protocols and Guidelines and be ready to answer questions from employees. Administrators, managers and supervisors must set a good example by following these at all times. This involves practicing good personal hygiene and school safety practices to prevent the spread of the virus and encouraging this same behavior from all employees.

Administrators, managers and supervisors will be expected to engage in regular supervisory monitoring and enforcement of work rules such as maintaining appropriate social distancing, use of personal protective equipment, etc.

Administrators, managers and supervisors are expected to be actively involved in creating plans for their staff's workspace, common spaces, workflow, visitor workflow, work schedules, work priorities, etc. to determine how to ensure adequate social distancing consistent with the MPS guidelines.

Administrators, managers and supervisors should communicate with custodial staff regularly about high-use areas that require heightened cleaning as well as identifying and arranging for necessary signage, taping, removal/rearrangement of furniture to ensure social distancing.

Attendance records must be kept at all in-person meetings to assist with contact tracing.

Administrators, managers and supervisors will refer any requests for accommodations under the Americans with Disabilities Act to the Director of Human Resources. They will continue to be vigilant working to ensure that employees are not targeted by harassment or discrimination because of belonging to a protected group and contact Human Resources when such a claim is brought to their attention.

Training

Mandatory trainings will be provided to all employees.

In addition, MPS will post the following at each work location and in public locations Compliance Attestation Poster (must be visible to all employees and visitors and be signed), Employer Poster, and Employee Poster. Signage will be provided throughout the schools for social distancing, mask wearing and handwashing. Entrance signage instructs individuals not to enter if showing COVID19 symptoms.

Visitors

During the regular school year, MPS will limit any nonessential visitors.

Responsibilities of Employees

MPS is asking every employee to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our schools, everyone must play their part. MPS has instituted various housekeeping, social distancing, and other best practices at our schools. All employees must follow these.

In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described above. If you have a specific question about these Protocols and Guidelines or COVID-19, please ask your administrator, manager or supervisor. If they cannot answer the question, please contact the Office of Human Resources.

Designated COVID-19 Point of Contact

Each School Building has a designated COVID19 Point of Contact. School Building Principals/Directors will provide this information in the school buildings. School Nurses' offices are also key points of contact for COVID-19 for students and staff.

Building Attendance Tracking

Any employee (or visitor) who comes in contact with a particular site will be logged to ensure the increased accuracy of contact tracing should an employee or visitor be sick. All employees must badge in each time they enter a school building, no exceptions. Employees should not hold doors open for each other unless another employee cannot physically open the door without assistance (ex., carrying large items that do not allow a free hand to open a door, pushing wheeled equipment or support needed for a physical disability or temporary physical condition). If a door is held open by any means upon entering a building, the badge must still be swiped for anyone entering the building before entrance. If your badge does not work, employees must sign in at the front entrance and report the badge failure so that it can be rectified.

COVID19 related absences should be coded as such by the employee in AESOP.

Employee Well-Being Monitoring

Under the Americans with Disabilities Act ("ADA"), disability-related inquiries or medical examinations of current employees are limited to fitness for duty inquiries and other inquiries that are "job-related and consistent with business necessity," including to determine if an employee will pose a "direct threat" of harm due to a medical condition. Under recent Equal Employment

Opportunity Commission (“EEOC”) and CDC guidance, the COVID-19 pandemic creates a sufficient risk to permit employers to ask certain disability-related inquiries and require certain medical testing during the COVID-19 pandemic without violating the ADA. Confidentiality and privacy rights as well as anti-discrimination protections will be maintained as indicated below.

Protocols for responding to COVID19 Symptoms

Employee Exhibits COVID-19 Symptoms at Work

Employees who begin to show signs of illness at work and become sick during the day must separate from other employees and students and go home. An administrator should be informed to arrange safe supervision of students if the employee oversees students and no other adult is immediately present and able to provide such supervision. Departure should not be delayed. If a supervisor is not available, another school administrator should be contacted to ensure safe departure. Employees who do not supervise students should leave the building immediately and inform a supervisor as soon as he/she exits the building. If an employee is unable to safely drive herself/himself home, they may go to the school isolation room and request support from the nursing staff. MPS will ensure the safe transportation of anyone who is sick to their home by coordinating with the employee’s emergency contact as necessary.

- Fever (100° Fahrenheit or higher)
- Chills or shaking chills
- Cough (not due to other known cause, such as chronic cough)
- Difficulty breathing or shortness of breath
- New loss of taste or smell
- Sore throat
- Headache when in combination with other symptoms
- Muscle aches or body aches
- Nausea, vomiting, or diarrhea
- Fatigue, when in combination with other symptoms
- Nasal congestion or runny nose (not due to other known causes, such as allergies) when in combination with other symptoms
- Other less common symptoms can include rash, inflammatory conditions such as “COVID toes,” and thromboembolic events.

If an employee has any of the symptoms as noted above, he/she must get a test for active COVID-19 infection and remain at home until the test result is available in which case, the following protocols must be followed:

Employee Tests Positive for COVID-19

The employee must remain at home (except to get medical care), monitor their symptoms, notify the school, notify personal close contacts, assist the school in contact tracing efforts, and answer the call from local board of health or Massachusetts Community Tracing Collaborative.

Employees who test positive will need to stay in self-isolation. Employees who test positive can return to in-person work at school after 10 days and once they have:

- d) gone **24 hours** without a fever (and without taking fever-reducing medications like Tylenol); and
- e) experienced improvement in other symptoms (for example, their cough has gotten much better); and
- f) received clearance from public health authority contact tracers (the local board of health or Community Tracing Collaborative) **or received clearance from their Doctor**

At this time, repeat testing prior to return is not recommended. Return to school should be based on time and symptom resolution. Written clearance from the public health authority contract tracers must be provided by the employee to MPS before the employee returns to any in-person work in a school building.

COVID19 Testing

A [list of test sites is available here](#) or at <https://www.mass.gov/info-details/about-covid-19-testing#where-can-get-a-test?> and Massachusetts also has an [interactive testing map](#) at that site. Staff and students who have symptoms should also contact their primary care physician for further instructions.

Employee tests negative for COVID19 after being symptomatic, the employee must follow the guidance of his/her medical provider and remain home until symptom free for at least 24 hours unless able to provide written clearance to return by a medical provider sooner than 24 hours after symptom free. Some medical clearance to return may be dependent upon medical circumstances of the individual as determined by his/her medical provider (e.g., allergies, asthma other non-COVID19 related illness).

Employees who are diagnosed with COVID-19 should expect to provide the Nurse's Office or Department of Health with a list of everyone who worked in close proximity (within 6') for a prolonged period of time (15 minutes or more) with them during the 48-hour period before the onset of symptoms. This ensures a full list of individuals for close contact notification and testing. The Nurse's Office or Department of Health will issue letters regarding any necessary quarantine, isolation or testing instructions. The Office of Human Resources will issue correspondence advising the employee regarding leave. Supervisors or managers should make sure to follow up with the employee to check on the results of any test, to see how the employee is feeling, and to offer any support.

Any shared office building, area, or classroom will be thoroughly cleaned and disinfected. MPS will ensure the safe and correct application of disinfectants and keep disinfectant products away from children.

Per EEOC guidelines, MPS may disclose this information to a public health agency without violating confidentiality obligations. MPS will not share the employee's identity more broadly without first receiving, in writing, a truly voluntary consent from the employee to do so, but such consent need not be provided to MPS.

If an employee tests positive for COVID-19 will need to stay home in self-isolation. Employees who test positive can return to in-person work at school after 10 days since symptoms first appeared and once they have:

- a) gone **24 hours** without a fever (and without taking fever-reducing medications like Tylenol); and
- b) experienced improvement in other symptoms (for example, their cough has gotten much better); and
- c) received clearance from public health authority contact tracers (the local board of health or Community Tracing Collaborative).

Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. MPS will require an employee to provide documentation clearing their return to work prior to return.

At this time, repeat testing prior to return is not recommended. Return to school should be based on time and symptom resolution. Written clearance from the public health authority contract tracers must be provided by the employee to MPS before the employee returns to any in-person work in a school building.

Anyone who investigates a potential employee's COVID positive situation will notify the Office of Human Resources. The Office of Human Resources will send the employee correspondence with information regarding leave. It is advisable that supervisors follow up to see both how the employee is feeling and to offer any support.

If an employee who tests positive shares a home with another MPS colleague or student, it is essential to disclose so necessary steps can be taken to notify potentially affected individuals.

Employee Has Close Contact with Individual Who Tested Positive for COVID-19

According to the Center for Disease Control and Prevention (CDC), close contact is defined as (a) being within approximately 6' (2 meters) of a COVID-19 case for a prolonged period of time; or (b) having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on). As a result, unless meeting the above criteria, the following examples **are not considered** exposure: walking through a public area or being in a building where an infected individual with a confirmed COVID-19 diagnosis has been.

All students and staff within a classroom are considered close contacts. If an individual in the class tests positive, the class will be converted to remote learning for a minimum of 5 days while appropriate testing takes place. Symptom onset and results of close contact tests will determine when the class can return to in-person learning.

Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to get tested. Such individuals should adhere to the protective measures noted previously and await a test result unless the individual experiences COVID symptoms, as described above. If they test positive, they will follow the procedures outlined above for employees who test positive for COVID.

If MPS learns that an employee has tested positive, MPS will attempt to determine from the employee the co-workers or others who may have had close contact with the confirmed positive employee. If an employee learns that they have come into close contact with a confirmed-positive individual outside of the workplace, they must immediately alert a supervisor.

Communication will be provided to all staff in the affected location. Also, all named close contacts will be contacted.

Sick Leave and COVID-19-Specific Laws and Regulations

An employee who exhibits symptoms of COVID-19 should stay home or immediately go home if such symptoms onset at work. As such, MPS will apply its usual policies and practices regarding sick leave. It is also essential that staff know that it is paramount to take CDC-recommended measures when they are sick, have been exposed, or are caring for someone who is sick. It is not the goal of MPS to punish anyone for taking time off. Employees should communicate with the Office of Human Resources about their circumstances.

Should an employee test positive for COVID-19 or have a family member who tests positive for COVID-19, new COVID-19 specific laws and regulations provide guidelines about the absences. Also, school closures as a result of COVID-19 have also been the subject of recent legislation. More specifically, on March 18, 2020, the Families First Coronavirus Response Act (FFCRA) was signed into law. The FFCRA contains two key provisions for employers – the Emergency Family and Medical Leave Expansion Act (EFMLEA) and the Emergency Paid Sick Leave Act (EPSLA). Both EFMLEA and EPSLA provide paid leave to employees for reasons related to COVID-19; both will expire on December 31, 2020.

The following is an overview of both the EPSLA and EFMLA:

	<u>EPSLA</u>	<u>EFMLA</u>
Employer	Public Agencies; employers < 500 employees	Public Agencies; employers < 500 employees
Eligible Employee	No eligibility requirement	Employed for at least 30 calendar days
Amount of Leave	FT employees: 80 hours PT employees: Average hours normally scheduled to work over a 2-week period	12 weeks
Reasons for Leave	<ol style="list-style-type: none"> 1. Employee is subject to a Federal, State, or local Quarantine or Isolation order 2. Health care provider has advised employee to self-quarantine related to COVID-19 3. Employee is experiencing COVID-19 symptoms and is seeking a medical diagnosis 4. Employee is caring for an individual who is subject to an order described in (1) or has been advised as described in (2) 	Employee is unable to work or telework due to care for the Son or Daughter under 18 years of age if the School or Place of Care has been closed, or the Child Care Provider is unavailable.

	<p>5. Employee is caring for a Son or Daughter if the School or Place of Care of the Son or Daughter has been closed, or the Child Care Provider is unavailable due to COVID-related reasons.</p> <p>6. Employee is experiencing any other substantially similar condition specified by the Secretary of Health and Human Services</p>	
Amount of Pay	<p>Reasons 1-3: Regular rate of pay up to a cap of \$511/day and \$5110/aggregate</p> <p>Reasons 4-6: two-thirds regular rate of pay up to a cap of \$200/day and \$2000/aggregate</p>	<p>First 2 weeks unpaid (but can use available EPSL)</p> <p>10 weeks: two-thirds regular rate of pay up to a cap of \$200/day and \$10,000/aggregate</p>
Intermittent	<p>None, absent employer/employee agreement, subject to: Never intermittent leave for reasons 1-4, and reason 6 if employee reports to worksite</p> <p>If agreement, intermittent leave only for reason 5 if employee reports to worksite, or if employee is teleworking</p>	<p>None, absent employer/employee agreement</p>
Sequencing	<p>Employer cannot require use of employer-provided paid leave before EPSL, but employee can choose to use such leave first</p>	<p>MPS will require employee to use available paid leave concurrently with EFML</p>
Health Insurance	<p>Coverage under group health plan maintained</p>	<p>Coverage under group health plan maintained</p>

Please reach to the Human Resources Office at (508-460-3509 Ext. 10108) with any questions if you believe you need relief under these laws.

It has been and will remain the practice of MPS to track staff absenteeism data; please note that its purpose is not, in any way, to deter any employee from taking time needed to care for themselves or their families but to monitor the changing staffing needs of the District.

Employee Exhibiting COVID-19 symptoms or An Employee Failing to Follow Other Protocols

It's the personal responsibility of every employee to protect themselves, their co-workers, their families and their communities. Along with holding yourself accountable for staying home when sick, taking immediate action should you feel sick while in a school building, encourage colleagues to do the same. Therefore, if a coworker displays symptoms – take immediate action. While maintaining social distancing, respectfully communicate and let them know you are concerned and care. Remind them of the importance of staying home when ill and taking immediate action if they become ill in school. Ask them to follow the designated processes. If a co-worker displays obvious symptoms but refuses to acknowledge it, or if you feel uncomfortable

approaching them, contact your supervisor, the nurses' office or the Office of Human Resources. The same guidelines apply for an employee who fails to follow hygiene, facial covering, and social distancing rules.

Body Temperature Monitoring and Other Tests

In keeping with current guidance, MPS is not planning daily temperature checks for all students and employees. If the district at any point, should require an employee to have a temperature check done on-site, the following will apply:

The EEOC expressly permits temperature checks during the COVID-19 pandemic. Employers performing temperature screenings of employees must comply with applicable federal, state and local health and safety laws to protect employees from potential workplace hazards. The CDC defines a fever as a temperature of 100° F or higher. The District reserves the right to do temperature checks either on site or requesting attestation to a temperature by the employee, provided the requirement is consistent and conducted in a non-discriminatory manner with respect to protected categories such as age, national origin, pregnancy, and religion. While the EEOC has not expressly addressed other types of medical examinations related to COVID-19, viral and antibody tests would presumably be permissible based on the same rationale. Any decision to test or screen employees will be made consistently across a job category or categories.

If an employee refuses to undergo a temperature check or other COVID-related test, the District may bar the employee from the workplace, but will not do so prior to a conversation that seems to identify the reason(s) for the refusal. If an employee requests an alternative method of screening when entering the workplace because of the employee's medical condition or religious belief, MPS will treat that as a request for a reasonable accommodation under the Americans with Disabilities Act or Title VII, as applicable.

Any COVID-19-related medical documentation will be kept separate from regular personnel files per ADA rules that require that employers must keep protected medical information confidential. Should the risk of infection with COVID-19 be no longer deemed a "direct threat" justifying widespread body temperature monitoring or other testing, this practice will become null and void.

If performing a temperature check on multiple individuals, a clean pair of gloves for each employee will be used, and the thermometer will be thoroughly cleaned in between each check. If disposable or non-contact thermometers are used and there is no physical contact with an individual, there is no need to change gloves before the next check. If non-contact thermometers are used, they should be cleaned and disinfected according to manufacturer's instructions. Employees who do not pass the screening protocols will move to a safe and private area to discuss next steps in accordance with this Guide.

If MPS performs temperature checks, only those persons who did not pass the screening and the reasons (e.g., temperature taken at 7:00 a.m. and again at 7:15 a.m. and at or above 100° F both times) will be recorded. This record will be kept among school district medical records once it is complete.

FLSA and Temperature Checks

While the guidance on the compensability of temperature checks is not definitive, should MPS require *on-site* temperature checks, MPS will pay non-exempt employees for the time spent measuring their temperature.

Health Screening Inquiries

The District may ask employees who report feeling sick at work (or who call out sick) questions about their symptoms to assess their risk of having COVID-19 (i.e. “Are you experiencing COVID-19 symptoms?” and “Have you been in close proximity to anyone who has been diagnosed with COVID-19 or who has COVID-19 symptoms?” and “Have you traveled to any states subject to the MA travel order?”)

An employee’s confidential medical information elicited from these questions will be treated confidentially under the ADA, and any employment action taken based on the answers to any inquiry will be non-discriminatory. If an employee physically seems to exhibit COVID symptoms, MPS may inquire about such symptoms by asking about the onset of such symptoms. If an employee calls in sick, a supervisor is permitted to ask if the employee is experiencing COVID-19 symptoms.

Inquiries About an Asymptomatic Employee’s Vulnerabilities

According to the EEOC, for as long as the COVID-19 pandemic remains severe, employers may have sufficient objective evidence to conclude reasonably that certain employees will face a direct threat of death or serious harm if they contract COVID-19. Only in this circumstance may employers make disability-related inquiries of asymptomatic employees to identify those at higher risk of complications. “Vulnerable individuals” (individuals over the age of 65 or individuals with serious underlying health conditions including high blood pressure, chronic lung disease, diabetes, obesity, asthma, and those whose immune system is compromised such as by chemotherapy for cancer and other conditions requiring such therapy) may require “special accommodations.” Please see information below and link to the CDC website for more information regarding types of serious medical conditions that “are” or “might be” at an increased risk.

While MPS may not ask employees if they have disabilities that make them more vulnerable to COVID-19, MPS is advising employees that if they have a disability, they can request an accommodation they believe they may need when the workplace reopens. Even if MPS knows that an employee has one of the medical conditions that place them at higher risk for severe illness, but the employee has not requested an accommodation, the ADA does not mandate employer action. In addition, the ADA does not permit the employer to remove the employee from the workplace or take any other adverse action solely because of the disability, unless the employee poses a direct threat to his health that cannot be eliminated by reasonable accommodation.

MPS will employ the same interactive process to determine reasonable accommodation (i.e., are there accommodations that would reduce or eliminate the threat of substantial harm to the employee?). If you feel you require such “special accommodations,” please reach out to Patricia Brown (508-460-3509) in Human Resources.

Qualified Individuals with a Disability

Absent undue hardship, MPS is required to provide a reasonable workplace accommodation to individuals who, due to a preexisting disability, are at a higher risk from COVID-19. It is possible

that many employees, including those with and without a disability, who have been working remotely, may request to continue working remotely for various reasons. In general, under the ADA, only a qualified individual with a documented disability is entitled to a reasonable accommodation that allows the employee to perform the essential functions of the job. Thus, the District will first determine whether the employee requesting the accommodation is a qualified individual with a disability.

An employer may ask questions or request medical documentation to determine whether an employee's disability necessitates a workplace accommodation, either the one they requested, or any other alternative form of accommodation. Questions for the employee may include: (1) a description of the impairment including nature, severity and duration, (2) how the disability creates a limitation, (3) potential workplace accommodations and how the requested accommodation will effectively address the limitation, (4) whether another form of accommodation could effectively address the issue, and (5) how a proposed accommodation will enable the employee to continue performing the "essential functions" of his/her position.

As with any accommodation request, the District will consider whether the requested accommodation constitutes an undue hardship on the District or waives an essential function of the employee's job duties. Because "undue hardship" means "significant difficulty or expense," an accommodation that would not have posed an undue hardship prior to the pandemic may pose one now. If a particular accommodation poses an undue hardship, MPS and the employee will work together to determine if there may be an alternative that does not pose such problems. Please note that the District will not automatically grant remote work as a reasonable accommodation to disabled employees who request to continue telecommuting once the workplace reopens. Such requests will remain subject to a reasonable accommodation analysis.

Note that all requests for accommodations will be eligible for an interactive process to determine whether there is a reasonable accommodation that will allow the employee to perform the essential functions of his/her position. This process can include MPS asking questions about the disability and/or requesting medical documentation. If you feel you require such accommodations, please reach out to [Patricia Brown](#) (508-460-3509) in Human Resources.

Per EEOC guidance, employees are not entitled to an accommodation under the ADA to avoid exposing a family member who is at higher risk of severe illness from COVID-19 due to an underlying medical condition. The EEOC notes by way of example, an employee without a disability is not entitled under the ADA to telework as an accommodation in order to protect a family member with a disability from potential COVID-19 exposure. The ADA prohibits discrimination based on association with an individual with a disability, but that protection is limited to disparate treatment or harassment.

Pregnant Employees

Under the Massachusetts Pregnant Workers Fairness Act, the District has an obligation to engage in an interactive process with a pregnant employee to determine an effective, reasonable accommodation to allow the employee to perform the essential functions of the job while pregnant or experiencing a pregnancy-related condition. No manager or supervisor at MPS may treat female employees more favorably than male employees (or vice versa) because of a gender-based assumption about who may have child-care responsibilities. MPS will not exclude pregnant employees from the workplace involuntarily, even if motivated by a desire to protect the pregnant employee.

If an employee requests an accommodation due to her pregnancy, MPS may be required to modify the job as an accommodation either because of the pregnancy or because of an underlying health condition that constitutes a disability. Such employees should reach out to Patricia Brown (508-460-3509) in Human Resources to discuss reasonable accommodations. MPS may request and obtain medical certification from the employee's health care provider to assist in exploring an appropriate accommodation plan.

Vulnerable Individuals

As noted above, employees over the age of 65 and employees with certain health conditions are considered "vulnerable individuals". Employees who have one of the medical conditions that put them at higher risk for severe illness from COVID-19 per the CDC guidelines can request a reasonable accommodation by letting the Office of Human Resources know they need a change in the working environment to meet a medical need. Such employees should reach out to Patricia Brown (508-460-3509) in Human Resources to discuss reasonable accommodations. MPS may request and obtain medical certification from the employee's health care provider to assist in exploring an appropriate accommodation plan.

With respect to certain underlying medical conditions, the CDC website has provided lists distinguishing between individuals who they advise "are" at increased risk of severe illness from COVID-19 and those who "might be" at an increased risk. To learn more about this, please go to the CDC website at:

[Click here to read the CDC guidelines.](#)

Educators and other staff who are at higher risk of severe illness from COVID-19 will want to consult with their health care providers about whether and under what circumstances a return to in-person school settings would be medically inadvisable.

Even though the CDC has explained that individuals over age 65 are at higher risk for a severe case of COVID-19, the Age Discrimination in Employment Act ("ADEA") prohibits employers from excluding older individuals from the workplace based on age (over 40), "even if the employer acted for benevolent reasons such as protecting the employee due to higher risk of severe illness from COVID-19." Older employees are not entitled to a reasonable accommodation due to their age (although they may have a medical condition which would then entitle them to a reasonable accommodation for a disability).

Mental Illness and Employee Fears

Absent undue hardship, an employee with a preexisting mental illness that has been exacerbated by COVID-19 may be entitled to a reasonable accommodation. While a preexisting mental illness which has been exacerbated by the COVID-19 pandemic (e.g., anxiety, obsessive compulsive disorder) may require a reasonable accommodation, employees cannot refuse to come to work because of very commonplace, ordinary-type fear and anxiety.

Under the Occupational Safety And Health Act (OSHA), employees may only refuse to work if they believe they are in "imminent danger." As a practical matter, it is unlikely that a stay-at-home order would be lifted in the event that COVID-19 still posed an immediate threat to employee safety. However, affected employees can reach out to the Office of Human Resources with questions if an employee believes they are in need of accommodations or support. MPS may

request and obtain medical certification from the employee's health care provider to assist in exploring an appropriate accommodation plan.

Refusal to Come to Work

If an employee fails to come to work because of COVID-19 concerns, the District will consider the reasonable accommodation requirements under the ADA. However, as a general rule, MPS may discipline an employee who refuses to come to work if the District is open *unless* the employee is eligible for and has been granted an approved leave of absence. Even if the employee has no available paid leave or mechanism for unpaid leave under an applicable collective bargaining agreement, reasonable accommodations will be explored prior to any disciplinary action as appropriate.

Travel Inquiries (Updated August 1, 2020)

MPS reserves the right to inquire about an employee's travel plans as long as all employees are being asked to disclose this information and the information requested is consistent and in line with the District's ability to maintain a healthy work environment.

Governor Baker issued a new Travel Order effective August 1, 2020. In it, all individuals arriving in Massachusetts, including Massachusetts residents who have left the state for anything more than transitory travel, **MUST quarantine for 14 days** unless they:

1. are coming from a lower-risk state (Connecticut, Hawaii, Maine, New Hampshire, New Jersey, New York and Vermont) or
2. can produce, on request, proof of negative test result for COVID-19 from a test administered on a sample taken not longer than 72 hours before their arrival in Massachusetts, or
3. meet the exemption criteria (see below).

If an individual took a test prior to their arrival but has not received their negative result, they **MUST quarantine until you receive the negative result**. An individual may obtain a test at their own expense after their arrival in Massachusetts but they **MUST quarantine until they obtain a negative result**. Individuals who fail to quarantine are subject to a \$500 fine per day. Anyone arriving from an international destination and must quarantine for 14 days or meet the 72-hour testing rule.

All MPS employees must follow this order. Employees are also expected to be at work during scheduled workdays to demonstrate regular attendance.

Therefore, MPS employees should plan ahead for the 14 days prior to their typically scheduled school start date to avoid the problem of missing additional workdays unnecessarily. Those who typically start 5 days prior to the start of school date and all new hires who attend orientation 5 days prior, should take those additional days into account. We are asking that employees do not make plans for travel 14 days prior to their start of work date to states that require 14 days of self-quarantine upon return unless such travel is completely unavoidable. We are asking that you consider the safety of others in a school system and make every effort to avoid travel to states that require quarantine upon re-entry and use a commonsense approach in this regard. We do also understand that there may be unplanned travel at the last minute, such as an ill or ailing family member. Please contact the Office of Human Resources for special circumstances that

could impact your ability to return to work on time after travel 508-460-3509 Ext. 10108. For updated information regarding states that require quarantine upon re-entry into Massachusetts, [please click here](#). MA travel restriction information is always subject to change, check it prior to departure in addition to advance planning now. This is not an ask that is convenient for everyone. In an effort to keep all school staff and students safe, we need you to honor this expectation and plan ahead to the absolute best of your ability.

Inquiries of Applicants

MPS can screen job applicants for symptoms of COVID-19 *after* making a conditional job offer as long as all employees in the same job category are subject to the same screening requirements. For instance, MPS may require all new hires to complete a questionnaire about recent travel or possible exposure to COVID-19.

If MPS determines that a new hire is at risk, the District may not withdraw its offer or employment unless the District also determines that the new hire poses a direct threat to the health or safety of the new employee or others. In addition, the District must determine whether the direct threat could be eliminated through a reasonable accommodation.

Reporting Concerns and Investigating Complaints

MPS has an obligation to protect all employees from workplace harassment based on medical conditions and racial/ethnic status. The District is aware that the pandemic has created the potential for increased bias, discrimination and harassment based on national origin, race, ethnicity and disabilities. Pandemic-related harassment due to national origin, race, age, or disability or other protected characteristics is strictly prohibited, and employers are responsible for reducing the chance of harassment arising because of COVID-19; fear of the pandemic should not be misdirected against individuals (i.e. demeaning, derogatory, or hostile remarks directed to employees) because of a protected characteristic, and it is against the law to harass or discriminate against co-workers because of a protected characteristic.

An employee who has been exposed to COVID-19, or whose family member has been exposed to COVID-19, should not be targeted by co-workers for harassment or exclusion upon return to work. Just like MPS has a duty to protect an employee who may be targeted by co-workers for belonging to a racial or ethnic group associated with a particular infectious disease, so too the District has a duty to protect such an employee from harassment based on their protected status or condition.

It is the role of administrators, managers and supervisors to watch for, stop, and report any harassment or discrimination; administrators, supervisors and managers will immediately review allegations of pandemic-related harassment or discrimination and take appropriate action. Everyone should review MPS's existing [anti-harassment and anti-discrimination policy](#) and direct all complaints to a supervisor and/or [Patricia Brown](#) (508-460-3509), Director of Human Resources.

Workers Compensation

Several factors will determine whether an employee is eligible for workers' compensation benefits due to a work-related exposure to an infectious disease. These factors include the type of disease,

the circumstances underlying the exposure, the employee's usual job duties, and the carrier's policies. An employee who believes that their COVID positive diagnosis is due to a work-related exposure to an infectious disease should contact the Office of Human Resources.

Fair Labor Standards Act ("FLSA") and COVID-19

According to the Department of Labor, FLSA does not prevent employers from allowing telework or other flexible work arrangements allowing employees to work from home, and in fact, employers can encourage or require telework as an "infection-control or prevention strategy" based on information from public health authorities. In doing so, employers may not make such decisions based on protected characteristics, such as national origin, race, gender, age, or pregnancy status.

When employees have permission to telecommute, the requirements of the FLSA still apply, and an accurate record of hours worked must be maintained for all employees. MPS will work with their employees, and respective bargaining units, to establish hours of work for employees who telework and a mechanism for recording each teleworking employee's hours of work. While in such circumstances, employees can be required to perform work that is not within their job description, the bargaining unit representatives will always be consulted beforehand.

Protected Concerted Activity

Even for any part of the MPS workforce that is not unionized, employees' rights to engage in protected concerted activity are protected if two or more employees talk about unsafe working conditions or if an employee brings group complaints about COVID-19 related issues in the workplace.

While on the job, the social distancing requirements which encourage a "No Congregation" policy by maintaining a minimum distance of 6' from other individuals are in effect for safety purposes; this provision is, in no way, meant to limit the employee's rights under Chapter 150E.

Employee Assistance Programs (EAPs)

The District recognizes that employees may be returning to work with heightened anxiety, during periods of mourning and/or under financial pressures, so please reach out to our EAP services which are confidential resources:

General Support | 1 (800) 451-1834 | Available 24/7

www.allonehealth.com/MIIAEAP

Smartphone App - Go to Google Play or App Store for "MIIA EAP" app. Log in with passcode: mii aeap Use the app to search for information or resources, and to contact the EAP for services.

MPS also recognizes that coping with COVID-19 has been trying and difficult. Feel free to contact the national distress hotline: 1 (800) 985-5990, or text TalkWithUs to 66746