

	Title: NWIC COVID-19 SAFETY PROCEDURE FOR CAMPUS OPERATIONS	Procedure# PRO-603
Prepared By:	Preparer's Title: Emergency Management Team Committee	Date Prepared: 9/10/2020
Approved By:	Administrative Team	Date Approved: 09/30/2020
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603.1 PURPOSE

This procedure is intended to set forth standards and protocols for Northwest Indian College (NWIC) employees, students and visitors for safe operations of NWIC in accordance with Lummi Public Health recommendation and CDC Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19).

603.2 Background

On March 3, 2020, the Lummi Indian Business Council (LIBC) declared a State of Public Health Emergency in accordance with Title 44 of the Lummi Code of Laws due to the novel infectious coronavirus (COVID-19). Since the public health emergency declaration, the LIBC has taken necessary and appropriate action to reduce the spread of COVID-19, including but not limited to, implementing a shelter in place mandate (LIBC Resolution #2020-055), authorizing the development of an alternate care site (LIBC Resolution #2020-054), suspending gaming operations at the Silver Reef Casino, and reducing the LIBC to vital functions. On March 13, 2020, NWIC moved to distance learning and the majority of NWIC employees were to work from home remotely.

603.3 SCOPE

Due to the economic impacts of COVID-19, the LIBC implemented the attached LIBC Phased Approach to Re-Opening on May 19, 2020. Each phase allows the resumption of limited LIBC operations until full re-opening in Phase III. NWIC is following the phased re-opening orders of the Lummi Nation as recommended by the Lummi Public Health Department. NWIC developed a COVID Response Plan (attached).

603.4 RESPONSIBILITY

The contents of this procedure were modified from the LIBC COVID-19 Policy for resuming Operations with guidance from the Lummi Public Health Team.

This procedure shall apply to all NWIC departments and programs. The managers and directors of each division, department and program are responsible to develop their own plan for returning to the workplace consistent with this procedure prior to return of on-site employees. The operating procedures are subject to approval by the Emergency Management Team and HR Director or designee and may be subject to Lummi Public Health recommendations.

603.5 Procedure

Role of NWIC Departments and Programs

NWIC divisions, departments, and programs can prevent and slow the spread of COVID-19 within the workplace. Managers and directors are responsible for the development and implementation of the plan for returning employees safely to the workplace.

NWIC departments, and programs are required to coordinate with the Emergency Management Team and HR Director or designee and Lummi Public Health as necessary for approval of their operating procedures.

All NWIC departments and programs shall implement and update as necessary the plan for returning to the workplace that:

- Is specific to their workplace;
- Addresses PPE use (if necessary), face coverings, disinfecting, health screenings, social distancing, sick employees, and telework;
- identifies all areas and job tasks with potential exposures to COVID-19;
- Is subject to change due to the reality of the pandemic progression;
- includes control measures to eliminate or reduce such exposures; and
- Is consistent with this Procedure.

NWIC Building Access Protocols

Purpose: To inform NWIC employees and community members of the standards when entering NWIC owned and/or operated buildings to ensure the health and safety of employees and community members.

Building Preparation

- Six-foot distance markers shall be placed at main entrances and other areas where lines may form in NWIC buildings, as appropriate.
- Physical barriers shall be used when a minimum of six feet physical distance cannot be maintained.
- Hand sanitizer will be available at main entrances and other locations as appropriate.

Classrooms: The capacity of classrooms is reduced to accommodate six feet social distancing between students. Signage to indicate the reduced capacity at the entrance to each classroom to be posted.

Protocol for Entering NWIC Buildings

- All visitors, NWIC students, and employees must enter the building entrance for health screenings and sign-in.
- Departments and programs shall consider staggered employee start times to reduce employee social distancing issues.
- Every effort will be made to conduct meetings online. Interaction will be brief and does not require extensive discussion (e.g. Check distribution, student advising, etc.) and it will be by appointment only.

Visitors

- Departments and programs are highly encouraged to schedule appointments in advance for all students and visitors and shall be incorporated in their returning to the workplace.
- All visitors are expected to self-certify their health status prior to entering a NWIC building by answering health questions indicated under Health Screening.
- An NWIC employee is required to contact a department and program staff member prior to sending visitor to their destination.

Common Area Usage

Purpose: To provide minimum standards for staff on usage of common areas.

Common area definition: Common areas include all areas of the building accessible by the public, students, or staff members for shared purposes, including lobbies and waiting areas, conference rooms, hallways, restrooms and break rooms, and elevators.

Common areas are unique areas that will require modifications, both physically and procedurally, to minimize potential exposure. Disinfection and cleaning of all common areas has been intensified in accordance with Disinfecting and Cleaning Protocols. Because these areas may be accessed by others at any time and maintaining six feet of distance may not always be possible, face coverings shall be worn in all common areas except when eating.

Lobbies and Waiting Areas

Space chairs in lobbies and waiting areas at least six feet apart and minimize use for absolute necessary. Frequently disinfect after each use. Everyone shall use a face covering in lobbies and waiting areas consistent with the Face Coverings Protocol (see below).

Conference Rooms

The capacity of conference rooms is reduced to accommodate a minimum six feet social distance between individuals. Signage indicate the reduced capacity at the entrance to each conference

room. Directors and managers will need to assess their own conference or meeting rooms to reduce capacity based upon maintaining six feet social distance between each individual.

Hallways

Because hallways may not be wide enough to allow passing while maintaining six feet of social distance, face coverings shall be worn at all times. Do not linger in hallways or engage in conversations as this will make the hallways more congested.

Restrooms

Restrooms are to be stocked at all times with sufficient supplies, particularly hand soap. Face coverings shall be worn at all times while using the restroom. Frequent cleaning is important, particularly when accessed by the general public and at the extent possible the public restrooms will be closed to the general public. Social distance rules apply.

Break Rooms

Individuals should eat in their respective work areas or outside locations as much as possible. If eating on the break rooms, a minimum six feet distance always need to be kept. If more than one department utilizes the same break room, directors should have a scheduled time for each department lunch as to avoid large groups of people congregating in the break rooms at any given time.

Elevators

Limit to 1-2 people in the elevator at a time, unless from same family. Frequent cleaning is important. Hand sanitizer should be available at the entry points on each floor.

Sick Employees Protocol

Purpose: To address when employees are excluded from the worksite due to illness, when employees may return to the worksite after illness, leave policies consistent with the NWIC HR Personnel Policy Manual, and COVID-19 Confirmed Case.

Exclusion from the worksite

Symptoms for COVID-19 includes the list below but many may have no symptoms or be pre-symptomatic:

1. Cough
2. Difficulty breathing
3. Tight chest of pain while breathing
4. Fatigue or body aches
5. Sore throat
6. Nausea/vomiting or diarrhea
7. Abdominal pain
8. Stuffy nose, loss of sense of smell or taste or sinus pressure

9. Headache that is unusual for you
10. Chills
11. Do you or your family members have been Diagnosed Covid-19 or being in close contact with a Person with Covid-19?

Employees who have any symptoms must immediately notify their supervisor and HR department and stay home. These employees will also be required to have a COVID-19 test before returning to work. This will be coordinated with the Lummi Public Health Department. If the employee needs medical attention, they should follow up with their primary care provider. Individuals with known medical conditions may present a doctor's note to allow them to return or continue to work (i.e., chronic allergies, chronic cough). These individuals will need to report any change to their baseline symptoms to their immediate supervisor and the Human Resources department.

Return to Work After Illness

Return to work will depend on the nature of the illness. If COVID-19 positive, the Public Health Department will have to release the employee before they can return to work. For all other illness, employees should wait until symptoms resolve prior to returning to work.

COVID-19 Confirmed Case Response Process

Employees shall communicate positive test results to their immediate supervisor. Employees and supervisors should immediately contact the public health line 360-383-8251. The Public Health Department will coordinate any needed response at NWIC. This will allow the public health team to quickly identify contacts and isolate and quarantine those affected to prevent disease spread. Supervisors shall make available a list of anyone that were physically present at their department consistent with the Contact Tracing protocol below. A thorough cleaning of the affected areas is needed before anyone is let back into the location where the COVID-19 confirmed employee had been working.

Administrative Leave with pay

NWIC employees will be eligible to utilize administrative leave with pay if they're unable to work from home remotely until they receive their Covid-19 test results.

Sick Leave

Contact Human Resources for any inquiries regarding leave associated with COVID-19 or other illnesses.

Health Screening

Purpose: NWIC will implement a health screening process daily for all employees and visitors prior to entering the buildings as a preventative measure to mitigate the spread of COVID-19.

- The NWIC building practices will require all employees, students and visitors to enter buildings and sign in and complete daily health checks;
 - shall maintain 6 feet social distance while waiting for in-person sign in and health check;
 - Those employees conducting the in-person sign-in and daily health checks shall always wear face masks.
 - Plexiglas barriers should be installed in all areas of face to face interactions as much as possible to decrease risk for the employees who directly interact with the public.
 - Employees shall be temperature checked once per day upon their arrival to any NWIC building. Students and visitors shall be temperature checked every time they enter an NWIC building.
- Extended Sites shall conduct a daily in-person health check to be included in your returning to your workplace template.

Please consider the following:

- in-person health checks shall be conducted safely and respectfully;
- All areas need to implement social distancing, barrier or partition controls, and personal protective equipment (PPE) to protect the screener. The minimum PPE should be a facemask. Eye protection and face shields should be utilized by those handling large groups of people that require face to face interaction.
- If PPE is in short supply, cloth face masks should be used and barrier protections such as Plexiglas should be installed.
- Complete the health checks in a way that helps maintain social distancing guidelines, such as providing multiple screening entries into the building.
- confidentiality of medical records from health checks.
- To prevent stigma and discrimination in the workplace, make employee and student health screenings as private as possible.

Health Screening Questionnaire

Every visitor shall be asked health screening questions at every visit. Every employee shall be asked every day and every returning employee shall be asked prior to return to the NWIC buildings. Below are the health screening questions:

1. Do you have a fever (temperature of 100.4 or above) or felt like you had a fever in the past 3 days?
2. Do you currently have any of these symptoms?
 1. Cough
 2. Difficulty breathing
 3. Tight chest or pain while breathing
 4. Fatigue or body aches

5. Sore throat
6. Nausea/vomiting or diarrhea
7. Abdominal pain
8. Stuffy nose, loss of sense of smell or taste or sinus pressure
9. Headache that is unusual for you
10. Chills
11. Do you or your family members have been diagnosed Covid-19 or being in close contact with a Person with Covid-19

3. Have you travelled outside Washington State in the past 14 days? If so, please contact Lummi Public Health for clearance before coming into the building.

4. Have you had close contact with anyone who is being monitored or investigated for novel coronavirus in previous 14 days? If yes, please contact public health.

Any employee, student or visitor that starts to experience any above Covid-19 symptoms are required to exit the campus and notify the public health department. In addition, the employee is to notify their immediate supervisor and the Human Resources department.

Denial of entry to building

Any employee, student or visitor that elects “yes” to any health screening question above or with a temperature of 100.4 or above will be denied entry to any NWIC building. Individuals with known medical conditions may present a doctor’s note to allow them to return or continue to work (i.e., chronic allergies, chronic cough). These individuals will need to report any change to their baseline symptoms to their immediate supervisor and the Human Resources department.

Travel and Large Gatherings

Purpose: To define protocols regarding travel for NWIC employees.

NWIC employees who engage in travel outside the areas authorized by the Shelter in Place Order and the NWIC Phased Approach to Reopening will be required to self-quarantine for fourteen days upon return in order to mitigate the spread of COVID-19 within the community. NWIC employees who participate in large gatherings or events not authorized by the LIBC Phased Approach to Reopening and NWIC Phased Approach to Reopening will be asked to self-quarantine for fourteen days upon return from the large gathering or event. The Shelter in Place order has specific language where travel can occur, but this determination may change due to the spread of COVID-19. When in doubt, before traveling, it is important to check with the public health department.

Contact Tracing Protocol

Purpose: To define roles of supervisors and managers to assist Public Health Department with necessary contract tracing.

Each supervisor and department manager shall maintain a list of all employees physically in the building each day. Those lists shall be kept as an official record for 30 days. Supervisors and department managers shall provide these lists to Lummi Public Health as requested.

Social Distancing

Purpose: To provide guidance to staff, directors, programs, and departments on minimum requirements to maintain social distancing.

Social Distancing: CDC defines social distancing, also called physical distancing, as keeping space between yourself and other people by:

- Staying at least six feet (about two arm's length) from other people;
- Not gathering in groups larger than 5 individuals.
- Staying out of crowded places and avoiding mass gatherings

Meetings, gatherings, and visitors

- All meetings, gatherings, and events shall be conducted virtually i.e., Microsoft Teams, Zoom, telephonic. If not possible to conduct virtually, any face to face meeting shall be limited to 10 individuals and social distancing of at least six feet between people shall always be maintained. Any face to face meeting, gathering, or event of more than 10 individuals shall be approved by the Emergency Management Team and coordinated by Security Manager to ensure health and safety compliance.
- Nonessential visitors shall not access any NWIC owned building.
- Individuals who need to utilize the bathrooms while waiting, should be given a face mask prior to entering the building. They should be asked to not wander in the buildings and to immediately depart after using the restrooms.

Inter-department visits

- Departments and programs shall avoid interacting face to face with individuals outside of their department, division, program unless absolutely necessary. Prioritize communication through phone call, teleconferencing, or through inter departmental envelopes for department exchanges.
- Employees shall use gloves when handling shared documents.

Staggered Scheduling/Flexible Work Schedule

- Staggered arrivals and departures of employees and others to limit contact between employees, students and essential visitors as much as possible. Each Director and Manager shall develop staff schedules to accommodate stagger arrivals and departures of their employees.
- If possible, all employees shall use flexible worksites (e.g. telework) and flexible work hours, in accordance to the NWIC HR Personnel Policy Manual Section 10.10 Flexible Work Schedule.

Employees who can work remotely shall do so and enter NWIC buildings only when absolutely necessary.

- When teleworking or flexing work schedules/hours is not practical or available, employees and others are to maintain a minimum of six feet of physical distance between employees and others.

Face Coverings

Purpose: To establish a protocol for wearing a face covering while in an NWIC owned or operated building as a measure to mitigate the spread of COVID-19. In accordance with LIBC Shelter in Place Order No. 04.1, all persons over the age of six shall wear face coverings that cover the mouth and nose while in public and private space. **NWIC Employees**

Face coverings must be worn in NWIC owned and operated buildings at all times. An appropriate face covering is one that covers the nose and mouth. It may be secured to the head with ties or straps or simply wrapped around the lower face. It may be made of a variety of materials, such as cotton, silk, or linen. Acceptable cloth face covering options include, but are not limited to:

- When available, a disposable surgical mask is more efficient and provides better safety for employees, visitors and students.
- Bandana
- Neck gaiter
- Homemade face covering
- Scarf

An inappropriate face covering is a cloth face covering that no longer covers the nose or mouth; has stretched out or damaged ties or straps; cannot remain securely attached to a person's face; has holes or tears in the fabric; and/or obstructs an employee's vision do not comply with this protocol. An employee, student and visitor must immediately replace their face covering when damaged or leave the worksite/campus.

If an employee has an illness that prohibits the use of face coverings, the employee shall inform their supervisor and Human Resources department. The employee, immediate supervisor and the employee shall develop a health plan for that employee to maintain their safety during COVID-19. The health plan must be approved by the public health team prior to returning to work. If a health plan cannot be developed the employee may not return to work.

The contents of this procedure were modified from the LIBC COVID-19 Policy for resuming Operations with guidance from the Lummi Public Health Team.

Employees who choose to use a surgical mask may do so as long as the surgical mask is in good condition and can remain securely attached to the employee's face.

Students and Visitors

Visitors must wear a face covering when entering and moving about NWIC owned and operated facilities.

PPE Use

Purpose: To provide guidance to staff and students on appropriate PPE use while physically on the worksite/school site.

The Purchasing Department shall keep track and coordinate procurement of all PPE needed for the NWIC. In addition, Site Managers will be responsible for tracking and coordinating their PPE, as needed. All requests for purchasing of PPE shall contact Maintenance and Facilities Director. Directors and managers that have questions relating to the type of PPE needed shall contact the Emergency Management Team committee.

Surgical Face Masks

Surgical face masks are recommended due to their ability to significantly reduce small particles, but cloth face coverings are acceptable alternatives consistent with the Face Coverings protocol below.

Gloves

Gloves shall be used by employees handling shared documents or distributing items with the public and by all maintenance staff.

Clear Face Shields/Eye Protection

Any employees with high amount of contact with the public shall use appropriate face shields/eye protection. For example, receptionist staff, finance staff distributing checks, and maintenance staff. Acceptable clear face shields/eye protection includes eye goggles and safety glasses. The clear face shields/eye protection can be re-useable if wiped down after each use. Sunglasses or regular vision glasses are not acceptable face shields/eye protection. Face shields are available from the Maintenance Department and available upon request.

Dividers/Plexiglas

Any employee that would like to add dividers to their desk, work station, counter and etc must contact the Maintenance Department. Plexiglas barriers should be installed in all areas of face to face interactions as much as possible to decrease risk for the employees who directly interact with the public.

Cleaning and Disinfecting Protocol

Purpose: To provide standards and procedures for cleaning and disinfecting NWIC owned and operated buildings during the COVID-19 pandemic.

Extended Sites shall include these minimum cleaning and disinfecting standards and procedures in their operating procedures.

Confirmed COVID-19 Deep Clean

All individuals shall be evacuated from the entire infected care. Housekeeping individuals shall wait 24 hours after last possible contamination of an area before entering the area. This allows all small particles containing COVID-19 to be removed from the air. After the 24-hour waiting period, housekeeping shall wear medical grade masks, goggles, chemical gloves, and medical gowns to conduct a complete clean of the area. A complete clean shall include wiping down ALL surfaces (printers, desktops, chairs, doorknobs etc.) If there is access to a Protexus, a clean will include walking through passing a mister over all surfaces. Upon the conclusion of the deep clean, employees will be welcomed to reenter their work area but not sooner than six hours after the affected person has been removed from the area.

Daily Cleaning

Custodians shall clean the bathrooms and common areas daily. This includes taking the trash, dusting and wiping surfaces down from the highest point that can be reached to the lowest point, vacuumed or swept/mopped while exiting the area.

Custodians shall remove trash from office spaces, dust and wipe surfaces, and vacuum or sweep or mop one time per day. Individual employees shall wipe down their office space with Clorox wipes often, preferably several times per day.

If there is access to a Protexus, it should be used in all bathrooms, common areas, and office spaces 1-2 times per day.

Custodians should clean doors and doors knobs every 1-2 hours in every public and high traffic areas.

Washing of hands

Employees and students shall wash their hands often, either with soap and water for 20 seconds or a hand sanitizer that contains at least 60% alcohol.

Training Protocol

Purpose: To establish training protocols for all NWIC employees, students, and visitors to ensure compliance with the COVID-19 Procedure.

All directors and department managers shall distribute this NWIC COVID-19 Procedure to all of their employees and all employees shall certify that they have read and understand the COVID-19 procedure prior to physically returning to an NWIC building. The Human Resources Office will coordinate with the LIBC Training/Safety Officer on training departments on these procedures.