

COVID-19 EXPOSURE MANAGEMENT PLAN GUIDANCE IN TK-12 SCHOOLS

Recent Updates: (Changes are highlighted in yellow)

11/11/2022

- Clarified close contact for large indoor airspaces. In indoor airspaces greater than 400,000 cubic feet per floor, close contacts are individuals (staff and students) within 6 feet of the infected person for 15 minutes or more over a 24-hour period. In indoor airspaces that are 400,000 cubic feet or less per floor, student close contacts are: 1) those who shared the same indoor airspace as the infected person for 15 minutes or more over a 24-hour period (preferred definition) or 2) those who were within 6 feet of the infected person for 15 minutes or more over a 24-hour period. For staff, identification of close contacts must use the shared airspace definition in indoor airspaces that are 400,000 cubic feet or less (per floor) as per Cal/OSHA guidelines.

NOTE: This protocol document may be updated as additional information and resources become available. Check the Pasadena Public Health Department website:

<https://www.cityofpasadena.net/covid-19/#guidance-faq-protocols> for updates to this document.

Timely, effective efforts to contain COVID-19 exposures at a school level, by school staff, can help maximize the impact of public health measures to contain COVID-19.

Primary and Secondary Schools serving students from transitional kindergarten through Grade 12 (TK-12 Schools) are trusted community partners that can help PPHD improve the timeliness and impact of the Public Health response through rapid initiation of a COVID-19 Exposure Management Plan (EMP). Immediate implementation of an EMP when a single case of COVID-19 is identified at a school can accelerate the ability to contain the spread of infection and prevent outbreaks from occurring.

The steps for managing exposures to COVID-19 cases at TK-12 Schools are described below and summarized in Appendix A. Because TK-12 Schools will vary in the level of resources available for COVID-19 exposure management, *required* steps are the minimum elements that must be included in the EMP. *Recommended* steps include optional elements for exposure management where school resources are sufficient. The requirements and recommendations presented are specific to TK-12 instructional and non-instructional facilities serving TK-12 Schools. For the purposes of this plan, the word “School” applies to both TK-12 instructional and non-instructional facilities. Check the PPHD website for additional resources and updates for schools <https://www.cityofpasadena.net/covid-19/#guidance-faq-protocols>.

Exposure Management Planning Prior to Identifying 1 COVID-19 Case at School

- Required:* A designated School COVID-19 Compliance Lead who is responsible for establishing and enforcing all COVID-19 safety protocols and ensuring that staff and students receive education about COVID-19. A designated COVID-19 Compliance Lead who serves as a liaison to PPHD for sharing site-level information to facilitate necessary public health action.
- Required:* A plan to report all known or suspected COVID-19 hospitalizations and/or deaths among students or staff to PPHD immediately by email to nursing@cityofpasadena.net.

- *Required:* A plan for all students, employees, and visitors who (1) have symptoms consistent with COVID-19, (2) were exposed to COVID-19 at school regardless of vaccination status, or (3) are at a school with an active public health investigation to have access to testing or be tested for COVID-19 infection.
- *Recommended:* Seating charts in classrooms and participant rosters for students and staff participating in school extracurricular programs to facilitate identification of close contacts of persons with COVID-19 at the school.
- *Recommended:* If a school elects to implement a routine school COVID-19 screening testing program, programs should use an FDA-authorized viral COVID-19 test, including a Nucleic Acid Amplification Test (NAAT, such as PCR) or an antigen test, which is collected and performed in a healthcare setting or certified testing site. An FDA-authorized Over-the-Counter test (or at-home test) is acceptable for use in COVID-19 school screening testing programs.
- *Recommended:* Apply CDPH guidance on [managing confirmed or suspected COVID-19 among students in K-12 settings](#) for persons who screen positive for symptoms prior to school entry or while at school.

Exposure Management for COVID-19 **Cases** at School

- *Required:* After identifying one confirmed or suspected COVID-19 case (student, employee, or visitor), the School Compliance Lead instructs the case to follow the [Home Isolation Instructions](#). NOTE: A person is considered to be diagnosed with or likely to have COVID-19, based on one of more of the following criteria: a) They received a positive diagnostic (viral) test for COVID-19 and/or b) A healthcare provider clinically suspects that they have COVID-19.
 - Students and staff with COVID-19 can end isolation on Day* 6 ONLY if all of the following criteria are met:
 1. A COVID-19 viral test** collected on Day 5 or later is negative; **AND**
 2. No fever for at least 24 hours without the use of fever-reducing medicine; **AND**
 3. Other symptoms are significantly improved and resolving.

**For symptomatic students and staff, Day 0 is the first day of symptoms; Day 1 is the first full day after symptoms develop. For asymptomatic students and staff, Day 0 is the day the first positive test was collected; Day 1 is the first full day after the positive test was collected.*

***The test must be an FDA authorized viral test (e.g., PCR or antigen test, including at-home tests). An antigen test is preferred for testing out of isolation.*
 - OR-
 - Isolation can end on Day 11 if both these criteria are met:
 1. No fever for at least 24 hours without the use of fever-reducing medicine; **AND**
 2. Other symptoms are not present or are significantly improved and resolving.
 - NOTE: For staff, per Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS), employers are required to fulfill the following: inform all employees about how they can obtain testing, offer testing at no cost and during paid time, and provide testing in a manner that ensures employee confidentiality. To comply with the testing requirements of the ETS, an over-the-counter (OTC) COVID-19 test may be both self-administered and self-read if verification of the results, such as a time and date stamped photograph of the

result or an OTC test that uses digital reporting with time and date stamped results, is provided. Additionally, staff may request masks and respirators from their employer at no cost to staff.

- While in isolation, students and staff are required to stay at home, away from others. If a student meets the criteria to leave isolation after Day 5, it is **strongly recommended** that they wear a highly protective mask when around others, both indoors and outdoors (except when eating or drinking), for 10 full days after onset of symptoms, or, if asymptomatic, after the first positive test. Staff with COVID-19 are **required** to wear a highly protective mask in the workplace around others, except when eating or drinking, for 10 days after the positive test. Refer to the CDC's [Use and Care of Masks](#) page for latest guidance on masking.

□ *Required:* The Compliance Lead works to identify all persons in the school with an exposure to the confirmed positive case during their infectious period (close contacts). A case is considered to be [infectious](#) from 2 days before symptoms first appeared until the time the case is no longer required to be isolated, or isolated in combination with testing and masking (i.e., no fever for at least 24 hours, without the use of medicine that reduces fevers AND other symptoms have improved AND at least 10 days have passed since symptoms first appeared). A person with a positive COVID-19 test but no symptoms is considered to be infectious from 2 days before the test was taken until their isolation ends.

- **Close Contact:** Persons are considered to have been exposed to a case (close contact) during the infectious period if:
 - **In indoor airspaces that are 400,000 cubic feet or less per floor:** They shared the same indoor airspace at school with the infected person (case) for a cumulative total of 15 minutes or more over a 24-hour period during an infected person's infectious period. This is the preferred definition to best mitigate additional transmission in school and is strongly recommended for identifying student close contacts in classrooms and similar sized indoor spaces. This shared indoor airspace definition must be used for identification of staff close contacts per Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS).
 - Alternatively, schools may limit designation of close contacts to individuals who were within 6 feet of the infected person for 15 minutes or more over a 24-hour period and may apply this definition in all settings, including classrooms.
 - **In indoor airspaces that are greater than 400,000 cubic feet per floor:** They were within 6 feet of the infected person (case) for a cumulative total of 15 minutes or more over a 24-hour period during the infected person's infectious period. This applies to both student and staff close contacts. NOTE: Spaces that are separated by floor-to-ceiling walls (e.g., offices, suites, break/eating areas separated by floor-to-ceiling walls) are considered distinct indoor airspaces.

NOTE: Persons with an outdoor exposure at school are not considered close contacts.

- *Required:* School Compliance Lead must notify PPHD of all clusters of 3 or more cases of COVID-19 in a classroom, office, or other pre-defined or identifiable group (i.e., cohort, team/club, etc.) who were on campus at any point within the 14 days prior to illness onset date (school-associated cases). Cases include employees, children/students, and visitors with confirmed COVID-19.
- *Required:* The School Compliance Lead submits this information to PPHD using the [COVID-19 Case and Contact Line List for the Education Sector](#). Secure (encrypted) online email via

nursing@cityofpasadena.net is the preferred method for notifying PPHD of COVID-19 exposures. All clusters with information for the cases should be reported to Public Health immediately, and no later than 1 business day of being notified of the third, or last, case in the cluster. If needed, additional time may be requested.

- *Required:* All close contacts to a COVID-19 positive case at school are notified by the School Compliance Lead of the exposure and provided with actions to take.
 - Notification can be performed using an individual or group notification method where members of relevant groups in which exposure occurred (e.g. classmates, teammates, cohorts) are notified of their exposure as a group and actions to take. Refer to the sample [exposure notification letter](#) (posted at <https://schools.covid19.ca.gov/>) for a model notification that may be adapted for the specific requirements or recommendations of each school site.
 - If applying the within 6 feet of an infected person for 15 minutes or more over a 24-hour period definition for identifying close contacts in **indoor spaces that are 400,000 cubic feet or less (e.g. classrooms or similar size settings)**, all other **students** who shared the same indoor airspace with the infected person for 15 minutes or more over a 24-hour period must be notified of a potential exposure and provided with the recommended actions to take.
 - Actions for close contacts
 - Asymptomatic close contacts are not required to quarantine; they may remain at the facility if they follow **all requirements** for close contacts, specifically: (1) monitor for symptoms; (2) wear a highly protective mask around others indoors, except when eating or drinking, for 10 days after the last date of exposure; (3) test with an FDA-authorized viral COVID-19 test (e.g., PCR or Antigen test, including at-home tests) within 3-5 days since the last date of exposure.*
 - If applying the within 6 feet of an infected person for 15 minutes or more over a 24-hour period definition to identify close contacts in **indoor spaces that are 400,000 cubic feet or less (e.g., classrooms and similar size settings)**, all other **students** who shared the same indoor airspace with the infected person for 15 minutes or more over a 24-hour period but were not within 6 feet of a confirmed case shall be notified of potential exposure despite not being close contacts and shall be **strongly recommended** to (1) monitor for symptoms; (2) wear a highly protective mask around others indoors, except when eating or drinking, for 10 days after the last date of exposure, for children ages 2 years and older and for staff; (3) test with an FDA-authorized viral COVID-19 test (e.g., PCR or Antigen test, including at-home tests) within 3-5 days since the last date of exposure.*
 - If symptoms develop, test using an FDA-authorized viral COVID-19 test and stay home. If the test is positive, follow the [Home Isolation Instructions](#) for COVID-19. Due to observed decreased sensitivity of current antigen tests to the Omicron variant, PCR testing is recommended in this instance.
 - Staff may request masks and respirators from their employer at no cost to staff.
 - Staff who are close contacts exposed at work must follow the guidance outlined in Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS). Please refer to Table 2 in Cal/OSHA's COVID-19 Emergency Temporary Standards [Frequently Asked Questions](#) for CDPH guidance after close contact, including for staff who are unable to mask.
 - ***NOTE:** Asymptomatic children and staff close contacts who were previously

infected with SARS-CoV-2 within the past 90 days are not required to quarantine and are exempt from testing, but must mask around others while indoors for 10 days after the last date of exposure.

- For students who have a mask exemption** and have been exposed, students should wear a face shield with a drape at the bottom if their condition allows. For students who cannot tolerate a mask or a face shield with drape at the bottom, they may remain on campus if (1) they remain asymptomatic, (2) monitor for symptoms for the 10 days after last exposure, AND (3) are required to test for COVID-19 twice during the 10 days after last exposure, once during days 3-5 and once during days 6-9. Students who cannot mask after exposure and cannot meet these requirements must remain at home until after Day 10 after last exposure.

**Individuals may be exempt from wearing a mask for the following reasons (refer to the [Public Health COVID-19 Protocol for TK-12 Public and Private Schools and School Based Programs](#) for additional information):

- Persons younger than two years old.
- Persons who are hearing impaired, or communicating with a person who is hearing impaired, where the ability to see the mouth is essential for communication.
- Persons with a medical condition, mental health condition, or disability whose medical provider has determined that it is unsafe for them to wear a mask, may file for an exemption with their school. A certification from a state licensed health care provider attesting that the student has a condition or disability that precludes them from wearing a mask safely will be accepted as proof of exemption. The following licensed health care professionals may provide such attestations: Medical providers including physician (MD or DO), nurse practitioner (NP), or physician assistant (PA) practicing under the authority of a licensed physician; and licensed mental and behavioral health practitioners including Clinical Social Worker (LCSW), clinical psychologist (Psy.D.), Professional Clinical Counselor (LPCC), or Marriage and Family Therapist (LMFT).
- For staff, per Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS), employers are required to fulfill the following testing requirements: inform all employees on how they can obtain testing, offer testing at no cost and during paid time, and provide testing in a manner that ensures employee confidentiality; to comply with the testing requirements of the ETS, an over-the-counter (OTC) COVID-19 test may be both self-administered and self-read if verification of the results, such as a time and date stamped photograph of the result or an OTC test that uses digital reporting with time and date stamped results, is provided. Additionally, staff may request masks and respirators from their employer at no cost to staff.

- *Required:* Schools are required to have a plan to facilitate COVID-19 response testing for all persons who have an exposure at school. Staff and students who are tested must inform the school of the test results. Testing resources can be found at: the [PPHD testing website](#), the [LA County testing website](#), and [Community-Based Testing Sites](#) (local health centers and pharmacies). Individuals who need assistance finding a medical provider can call the Pasadena Citizen Service Center (626-744-7311) or the LA County Information line 2-1-1, which is available 24/7.

- *Recommended:* School Compliance Lead will determine whether additional notification is needed to inform the wider school community about the school exposure and precautions being taken to prevent spread of COVID-19. A general notification letter template is available at: [COVID-19 Template Notification Letters for Education Settings](#). This template should be modified to represent the policies and procedures for each school site.
- *Recommended:* School Compliance Lead consults with PPHD to determine whether cases within the reported cluster are epidemiologically linked, meaning that the affected individuals were present at some point in the same setting during the same time period while any of the individuals were infectious.*

**A case is considered to be infectious from 2 days before symptoms first appeared until they are no longer required to be isolated (i.e., no fever for at least 24 hours without the use of medicine that reduces fever AND other symptoms have improved AND at least 10 days have passed since symptoms first appeared). A person with a positive COVID-19 test but no symptoms is considered to be infectious from 2 days before their test was taken until isolation ends.*

- Determination of epidemiological links between cases may require further investigation to assess exposure history and identify all possible locations and persons that may have been exposed to the case while infectious. A tool is available to assist in the assessment of epidemiological links at: [COVID-19 Exposure Investigation Worksheet for the Education Sector](#), or using a format proposed by the school and approved by the Pasadena Public Health Department. For technical assistance on how to assess for epidemiological links, please contact nursing@cityofpasadena.net.
- Epidemiologically linked cases include persons with identifiable connections to each other such as sharing a physical space (e.g., in a classroom, school event, sports team, other extracurricular activities, school transportation, office site), indicating a higher likelihood of linked spread of disease in that setting rather than sporadic transmission from the broader community. If epidemiological links exist, PPHD will advise the school on important steps to take and communications to students and employees regarding precautions to take to prevent further spread at the school, including implementation of site-specific interventions for infection control.
- PPHD will review the *Line List for Cases and Contacts* to determine whether the outbreak criteria have been met. PPHD will contact the school within 1 business day to advise on next steps. Outbreak Criteria: At least 3 confirmed cases with symptomatic or asymptomatic COVID-19 within a 14-day period in a group** with members who are epidemiologically linked, do not share a household, and are not a close contact of each other outside of the campus.

***School groups include persons that share a common membership at school (e.g., classroom, school event, school extracurricular activity, academic class, sport teams, clubs, and transportation). Epidemiological links require the infected persons to have been present at some point with shared indoor airspace during the same time period while infectious.*

- If outbreak criteria are not met, PPHD may advise the school to continue with routine exposure management.
- If outbreak criteria are met and PPHD recommends an outbreak response, PPHD will notify the school that an outbreak investigation has been activated and a public health investigator will communicate directly with the school to coordinate the response.

- PPHD will coordinate with the school on outbreak management for the duration of the outbreak investigation.
 - The School Compliance Lead will submit all requested information, including updates to the *Line List for Cases and Contacts*, to the investigator until the outbreak is resolved (i.e., no new cases at least 14 days since the last confirmed case).
- NOTE: For overnight camps, a “household cohort” means cabin mates (campers and staff) who are staying together in a cabin, bunkhouse, or similar space. Confirmed cases that are part of the same household cohort are not counted separately toward meeting outbreak criteria.

COVID-19 Exposure Management Plan (EMP) Contact Information

I, _____ (Head of School/Superintendent), attest that my school, _____ (name of school), has prepared our exposure management plan, designated staff for the COVID-19 School Compliance Team, and the members of that team have completed training on:

- Schools and School-Based Programs TK-12 – Public Health Reopening Protocol
- Exposure Management Plan Guidance for Schools TK-12
- COVID-19 Case and Contact Line List for the Educational Sector
- COVID-19 Exposure Investigation Worksheet for the Education Sector
- COVID-19 Template Notification Letters for Education Settings

Signature _____

Date _____

PERSON RESPONSIBLE FOR IMPLEMENTING EMP
Person in Charge (COVID-19 School Compliance Lead): <div style="border: 1px solid black; height: 25px; width: 100%; background-color: #d9e1f2;"></div>
Title: <div style="border: 1px solid black; height: 25px; width: 100%; background-color: #d9e1f2;"></div>
Phone Number: <div style="border: 1px solid black; height: 25px; width: 100%; background-color: #d9e1f2;"></div>

Appendix A: Steps for Managing Exposures to COVID-19 Cases at School

1 Case	<ol style="list-style-type: none">1) <i>Required:</i> School instructs the case to follow COVID-19 home isolation instructions.2) <i>Required:</i> School works with the case to identify school close contacts. Schools can contact PPHD at: nursing@cityofpasadena.net or (626) 744-6089, option 2 for assistance with identification of close contacts and exposure management.3) <i>Required:</i> School identifies and notifies* school contacts of an exposure. <p>* Notification letter templates are available at: COVID-19 Template Notification Letters for Education Settings.</p>
2 Cases	<ol style="list-style-type: none">1) <i>Required:</i> Follow required steps for 1 confirmed case.2) <i>Recommended:</i> If the 2 cases occurred within 14 days of each other, school consults with PPHD to determine whether the cases have epidemiological (epi) links**. If there are no epi links, school continues with routine exposure management. If an epi link exists, school implements additional infection control measures. <p>**A COVID-19 Exposure Investigation Worksheet for the Education Sector tool is available to help assess for epi links.</p>
3+ Cases	<ol style="list-style-type: none">1) <i>Required:</i> School instructs the case to follow COVID-19 home isolation instructions.2) <i>Required:</i> School works with the case to identify school close contacts. Schools can contact PPHD at: nursing@cityofpasadena.net or (626) 744-6089, option 2 for assistance with identification of close contacts and exposure management.3) <i>Required:</i> If a cluster of 3 or more cases in a classroom, office, or in a pre-defined group (i.e. cohort, team, or club, etc.) who were on campus at any point within the 14 days prior to illness onset date, the school immediately notifies PPHD at nursing@cityofpasadena.net or (626) 744-6089, option 2.4) <i>Required:</i> PPHD determines if outbreak criteria have been met. If a PPHD outbreak investigation is activated, a public health investigator will contact the school to coordinate the outbreak investigation.5) <i>Recommended:</i> School sends general notifications* to inform the wider school community of the school exposure and precautions taken to prevent spread.