

Exposure Risk Assessment Form

Assessment Completion Details

Gervais Elementary School / Gervais School District

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Employee job classifications evaluated in this assessment:

Administrative Employee

Certified Employees (classroom teachers)

Classified Employees (Instructional Assistants, office staff, custodial staff, etc.)

Questions and Answers

Can employees telework or otherwise work remotely? How are employees encouraged or empowered to use those distance work options to reduce COVID-19 transmission at the workplace?

This OSHA Exposure Risk Form is being written for when students return to Gervais Elementary School for on-site learning, which will take place on Wednesday, September 1st 2021 and occur Monday through Friday until the end of the school year (mid-June). When this occurs, staff members will not be able to accomplish their tasks by teleworking or working remotely. To encourage employees to adhere to social distancing requirements as often as possible: (a) on designated workdays in which students are not in the buildings, staff may be permitted to work remotely, which will be determined on a case-by-case basis; (b) the majority of staff meeting time will be conducted in small cohorts, rather than a larger gathering of staff, and virtual check-ins with administration will be available as needed; (c) parent-teacher conference and IEP meetings will be offered in a virtual format; (d) and staff-to-staff team meetings (i.e. Kindergarten teacher meetings) will be done remotely whenever feasible, and when not feasible, in the smallest cohorts for the shortest duration possible to achieve the desired objectives and outcomes of the team.

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What are the anticipated working distances between employees? How might those physical working distances change during non-routine work activities?

Administrative staff will ensure social distances are kept by working from their respective offices. Licensed staff will ensure the same by working from their individual respective classrooms. Classified staff, whenever possible, will work in spaces that are as minimally manned as possible, and at all times, their workstations will be no closer than 3-feet from any other workstation, staff or student. This will remain constant for both routine and non-routine work activities.

What is the anticipated working distance between employees and other individuals? How might those working distances change during non-routine work activities?

The anticipated working distance between employees and other individuals shall be no less than 3-feet whenever feasible. If that working distance is reduced for any reason, employees will keep the interaction for the shortest duration of time possible (no more than 15-minutes under any circumstances), between a plastic or Plexiglas barrier if possible, and always wearing face coverings. This will remain standard practice for both routine and non-routine work activities.

How have the workplace or employee job duties, or both, been modified to provide at least 3-feet of physical distancing between all individuals?

All employee workspaces have been verified or adjusted to be no closer than 3-feet apart from any other workplace. Classrooms have been redesigned so licensed and classified staff members can instruct from the front of the room more frequently and reduce the time they are walking throughout the room, amongst the students. All student desks will have the option to use a three-sided plastic barrier on their desk if they'd like. In larger common spaces, like the gymnasium and music rooms, blue 'x' marks have been added to the ground at no less than 3-feet from each other. Classified job duties have been adjusted to provide them less time in the classrooms with students, which subsequently means fewer interactions and whenever possible, always interacting at least 3-feet of physical distance from anyone else (staff or students).

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How are employees and other individuals at the workplace notified where and when masks, face coverings, or face shields are required? How is this policy enforced and clearly communicated to employees and other individuals?

It is both school district and individual school policies that at all times when on campus, staff, students, and any visitors must be wearing appropriate facial coverings (masks or shields) at all times. This notification has been provided to staff and other individuals by way of several different methods of communication, included posted signs, email, virtual staff meetings, notices to parents, and professional development training. This policy is clearly communicated to employees and other individuals through the continued use of the aforementioned strategies, and is enforced by the school principal (school administrator) and his designees. All staff members are encouraged to non-punitively enforce this policy with each other, providing reminders when someone notices if a face mask/covering/shield is not being worn. Finally, an anonymous concern and complaint process has been established, which will allow staff members to provide anonymous concerns regarding this policy, or staff members who are failing to adhere to it. Submissions for this anonymous concern and complaint process are monitored weekly.

How have employees been informed about the workplace policy and procedures related to reporting COVID-19 signs and symptoms? How might employees who are identified for quarantining or isolation as a result of medical removal under this rule be provided with an opportunity to work at home, if such work is available and they are well enough to do so?

Employees have been informed about workplace policies and procedures related to reporting COVID-19 signs and symptoms by way of several different methods of communication, included posted signs, regular email reminders, regular notices provided at virtual staff meetings, and through professional development training. If an employee who is identified for quarantining or isolation as a result of medical removal under this rule, that employee will be provided with an opportunity to work remotely from home. Specific details regarding the nature of that remote work will be determined by the school administrator.

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How have engineering controls such as ventilation (whether portable air filtration units equipped with HEPA filters, airborne infection isolation rooms, local exhaust ventilation, or general building HVAC systems) and physical barriers been used to minimize employee exposure to COVID-19?

The Gervais School District Director for Maintenance and Custodial Duties have conducted multiple assessments, and provided reports on those assessments, regarding the aforementioned engineering controls in elementary school physical spaces. In physical spaces where the assessment results were deemed unsatisfactory, based on OSHA or other regulatory thresholds, mitigating remedies were installed, which includes the installation of air filtration units (equipped with HEPA filters) in rooms, the appropriate designation and outfitting of an infection isolation room on campus, and analysis and modifications to existing local exhaust ventilation systems (Gervais Elementary School does not have a building HVAC system). Finally, wherever deemed possible and necessary, including on all student desks and any employee workstation where they will interact with others, physical barriers are used to minimize possible exposure to COVID-19.

How have administrative controls (such as foot-traffic control) been used to minimize employee exposure to COVID-19?

Extensive work has gone in to modifying practices and administrative controls to minimize employee exposure to COVID-19. In addition to signage being displayed throughout the campus to provide written and visual reminders of best practices (continue social distancing, wear face coverings at all times, wash hands frequently, etc.), signage has been applied to the ground to indicate one-way directional foot-traffic movement, entry and exit patterns from the building have been modified to minimize congregation at entry/exit points, use of various facilities by students is scheduled and staggered to reduce the risk of congregation in common areas, and extensive sanitation procedures are being applied, both during the workday when employees are present and after the workday when employees have left for the day. Regular email reminders, regular notices provided at virtual staff meetings, and professional development training will be continually used to remind staff of these administrative controls.

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What is the procedure or policy for employees to report workplace hazards related to COVID-19? How are these hazard reporting procedures or policies communicated to employees?

Employees are encouraged to share any suspected or known hazards with the building administrator as soon as it is practically possible to do so. If an employee does not feel comfortable sharing a suspected or known hazard with the building administrator, an anonymous concern and complaint process has been established, which will allow staff members to provide anonymous concerns regarding suspected or known hazards related to COVID-19. Submissions for this anonymous concern and complaint process are monitored and communicated back to staff weekly in virtual staff meetings and in a weekly newsletter email.

How are sanitation measures related to COVID-19 implemented in the workplace? How have these sanitation practices been explained to employees and other individuals at the workplace?

The Gervais School District Maintenance and Custodial department, under the direction of the district Superintendent and the supervision of the building administrator, has implemented an extensive sanitation procedure, which is applied both during the workday when employees are present and after the workday when employees have left for the day. This includes the regular sanitizing of both personal and commonly touched items (i.e. doorknobs), the reduction of use of commonly touched items whenever feasible, and the distribution of sanitizing supplies throughout the building. Employees and other individuals are made aware of these sanitation practices through posted signs, regular email reminders, regular notices provided at virtual staff meetings, and through professional development training.

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How have the industry-specific or activity-specific COVID-19 requirements in Appendix A of this rule and applicable guidance from the Oregon Health Authority been implemented for workers? How are periodic updates to such guidance documents incorporated into the workplace on an on-going basis?

Appendix A, otherwise known as the “Temporary Oregon OSHA COVID-19 Rule, Appendix A, Mandatory Workplace Guidance for Industry-Specific and Activity-Specific Activities,” subsection A-13, provides requirements specific to K-12 Educational Institutions (Public or Private). The requirements listed in this subsection, which include general operations, advanced quarantine measures, physical distancing measures, the use of cohorts to supplement physical distancing measures, special precautions related to volunteers and visitors, and sanitation and cleaning, are all addressed at-length in Gervais Elementary School’s Operation Blueprint submission, as required by the Oregon Department of Education and Oregon Health Authority’s “Ready Schools, Safe Learners” document. Both standing and periodic updates are provided to employees on an on-going basis through posted signs, regular email reminders, regular notices provided at virtual staff meetings, and through professional development training.

In settings where the workers of multiple employers work in the same space or share equipment or common areas, how are the physical distancing; mask, face covering, or face shield requirements; and sanitation measures required under this rule communicated to and coordinated between all employers and their affected employees?

Wherever possible, conditions and settings where the workers of multiple employers work in the same space or share equipment or common areas have been reduced or eliminated. When it is not feasible to eliminate the spaces, employees are communicated of mandates regarding physical distancing, face mask/shield/covering requirements, and sanitation measures through posted signs, regular email reminders, regular notices provided at virtual staff meetings, and through professional development training. The communication and adherence of these mandates will be coordinated between the affected employees, the respective building administrators, and the district superintendent.

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How can the employer implement appropriate controls that provide layered protection from COVID-19 hazards and that minimize, to the degree possible, reliance on individual employee training and behavior for their efficacy?

Through posted signs, regular email reminders, regular notices provided at virtual staff meetings, and through professional development training, the employees of Gervais Elementary School will both support themselves and each other in following mandates and regulations regarding COVID-19 safety and best-practices. Furthermore, all employees will be mandated to wear appropriate PPE while on campus, and when needed, the school will provide additional PPE (face coverings, gloves, medical smocks, etc.) to ensure physical layered protection is both available to employees and used, when appropriate. An anonymous concern and complaint process can be used for staff members to report concerns if they suspect or know of other staff members who are not appropriately following COVID-19 hazard protection and mitigation mandates.
