

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

Recent Updates: (Changes are highlighted in yellow)

4/29/2022:

- Updated the definition of a COVID-19 close contact in alignment with updated California State guidance.
- Updated quarantine guidance to clarify that while asymptomatic students with an exposure are not required to quarantine, in order to remain on campus, they are required to test within 3-5 days after last exposure and mask around others while indoors, except while eating or drinking, for 10 days after last exposure. These updated masking and testing requirements for asymptomatic exposed students will go into effect on May 5, 2022.

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 1, 2, and 3 or more 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 cases, 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 a confirmed case of 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 strategy for periodic testing for asymptomatic individuals with no known exposure, staff and students that are not fully vaccinated should be prioritized for regular testing as an important part of identifying infections early to prevent transmission on campus. Based on the current level of community transmission, fully vaccinated individuals may be considered for asymptomatic screening testing programs if there is sufficient testing capacity. School screening testing 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. Note, unverified Over-the-Counter test results cannot be used to fulfill required testing for school employees under the [California State Health Officer Order](#).
- *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 1 COVID-19 Case 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 [Health Officer Order for Isolation](#). 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 --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.
 - *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.
 - NOTE: For staff, per Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS), testing that is required for employees must be provided by the employer free of charge and during work hours; these tests may not be self-administered or self-read unless

they are observed by the employer or an authorized telehealth proctor.

- While in isolation, students and staff should 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 [Your Guide to 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 they shared the same indoor airspace at school with the infected person for 15 minutes or more cumulatively over a 24 hour period. In large indoor airspaces, those considered exposed may be limited to 1) those in a pre-defined or identifiable group (e.g., teammates, club members, cohort, etc.) or 2) those within 6 feet of the infected person for 15 minutes or more over a 24-hour period. NOTE: Persons with an outdoor exposure at school are not considered close contacts.

Required: School Compliance Lead must notify PPHD of employees, students, and visitors with confirmed or suspected COVID-19 who were on campus at any point within the 14 days prior to the illness onset date.

- The School Compliance Lead submits this information to PPHD using the [COVID-19 Case and Contact Line List for the Education Sector](#) within 1 day of notification of a case. If needed, additional time may be requested. Secure (encrypted) online email via nursing@cityofpasadena.net is the preferred method for notifying PPHD of COVID-19 exposures.
- Schools utilizing the Group Tracing Option may notify groups of people exposed to the infected person while indoors during the infectious period.

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.

Action for close contacts who are **required** to quarantine:

- The following close contacts are required to quarantine:
 - **Asymptomatic** staff who are not [up to date on COVID-19 vaccines](#) are required to

quarantine*

*Asymptomatic fully vaccinated staff who are close contacts and not boosted (if eligible) **but required to quarantine** may remain on site at the workplace (school) during the quarantine period, however, they are **required** to test once within 3-5 days after the last exposure date. Requirement to quarantine continues to apply to all settings other than the workplace as outlined in the immediate section below. This guidance is outlined in Cal/OSHA COVID-19 [Emergency Temporary Standards](#) (ETS).

- **Unless they meet the criteria for remaining on site at school, staff** close contacts who are required to quarantine must self-quarantine (stay in their home or another residence, separate from others) and monitor for symptoms as outlined in the [Health Officer Order for Quarantine](#). As long as symptoms of COVID-19 are not present they may end quarantine either:
 - After 10 full days have passed from their last known contact to the infectious case. Activities may resume starting on Day 11 provided they are asymptomatic; **OR**
 - After at least 5 full days have passed from their last known contact to the infectious case if they have a negative viral test result from a specimen collected on Day 5 or later from the date of last exposure to the case. Activities may resume starting on Day 6 or later. The test must be an FDA-authorized viral COVID-19 test (e.g., NAAT/PCR preferred, or antigen test including an FDA-authorized over-the-counter test acceptable). If the test is positive, follow the [Health Officer Order for Isolation](#) for COVID-19. NOTE: For staff, per Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS), testing that is required for employees must be provided by the employer free of charge and during work hours; these tests may not be self-administered or self-read unless they are observed by the employer or an authorized telehealth proctor.
- Regardless of when quarantine ends, **close contacts who are required to quarantine** must continue to monitor their health and are **required** to wear an upgraded mask for 10 days from the date of last exposure. **Staff may request masks and respirators from their employer at no cost to staff.** Adults should wear a surgical mask (three-ply medical procedure mask with a nose wire) or higher level of PPE such as KN95 mask or N95 respirator. Children should wear a non-cloth mask of multiple layers of non-woven material with a nose wire (cloth masks meeting ASTM standards for high filtration efficiency (ASTM F3502-level 2) are permitted). See [CDC Masking guidance](#) for more information on types of masks.
- If symptoms develop, test using an FDA-authorized viral COVID-19 test and stay home. If the test is positive, follow the [Health Officer Order for Isolation](#) for COVID-19. **Due to observed decreased sensitivity of current antigen tests to the Omicron variant, PCR testing is recommended in this instance.**
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Action for close contacts who are exempt from quarantine:

- The following close contacts are not required to quarantine provided they remain asymptomatic:
 - **Students, regardless of vaccination status**
 - Staff who are [up to date on COVID-19 vaccines](#) (fully vaccinated AND boosted); **OR**

- Staff who are [fully vaccinated and not yet booster-eligible](#)
 - Close contacts who are not required to quarantine **may remain on campus if they meet all of the following requirements:**
 1. Monitor for symptoms; **AND**
 2. Wear a highly protective mask around others indoors, except when eating or drinking, for 10 days after the last date of exposure; **AND**
 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*.
 - *NOTE: Asymptomatic students and staff close contacts who were previously infected with SARS-CoV-2 within the last 90 days are not required to quarantine and are exempt from testing but must mask around others indoors for 10 days after the last date of exposure. It is recommended that close contacts wear a mask when within 6 feet of others outdoors as well.
 - If symptoms develop, test using an FDA-authorized viral diagnostic test and stay home. If the test is positive, follow instructions on the [Health Officer Order for Isolation](#).
 - Staff may request masks and respirators from their employer at no cost to staff.
 - Per Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS), testing that is required for employees to return to work must be provided free of charge and during work hours; these tests may not be self-administered or self-read unless they are observed by the employer or an authorized telehealth proctor.
- *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.
- *Required:* Employees with a campus exposure should follow guidance outlined in Cal/OSHA COVID-19 Prevention [Emergency Temporary Standards](#) (ETS) Isolation and Quarantine section. However if an employee's quarantine period ends before they meet Cal/OSHA's criteria for return-to-work, they may return to the worksite(s) as soon as they have cleared quarantine per the [Health Officer Order for Quarantine](#). Per Cal/OSHA ETS, testing that is required for employees must be provided by the employer free of charge and during work hours; these tests may not be self-administered or self-read unless they are observed by the employer or an authorized telehealth proctor
- *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.

Exposure Management for 2 COVID-19 Cases at School within a 14-day Period

- Required:* After identifying 2 confirmed cases (students and/or employees) within a 14-day period, the school follows the *required* steps for 1 case.
- Recommended:* School Compliance Lead consults with PPHD to determine whether the 2 cases are epidemiologically linked, meaning that the two affected individuals were both present at some point in the same setting during the same time period while either or both 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.
- If epidemiological links do not exist, the school continues with routine exposure management.
- If epidemiological links exist, the school reinforces messages to students and employees on precautions to take to prevent spread at the school, including implementation of site-specific interventions.

Exposure Management for ≥ 3 COVID-19 Cases at School within a 14-day Period

- Required:* If the school identifies a cluster of 3 or more linked cases (students and/or employees) within a 14-day period, the school should proceed with the following steps:
 - Report the cluster to PPHD within 1 business day via secure email at: nursing@cityofpasadena.net or by calling (626) 744-6089.
 - Complete the *Line List for Cases and Contacts*, available at [COVID-19 Case and Contact Line List for the Educational Sector](#), or using a format approved by the Pasadena Public Health Department and submit via secure email to nursing@cityofpasadena.net. For technical assistance on how to complete the line list contact nursing@cityofpasadena.net.
 - 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, PPHD will initiate an outbreak investigation.
- PPHD will coordinate with the school on outbreak management for the duration of the outbreak investigation.
- The School Compliance Lead will submit 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 cabinmates (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.**
 - **If outbreak criteria are not met, PPHD will 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.**

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): <input type="text"/>
Title: <input type="text"/>
Phone Number: <input type="text"/>

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

1 Confirmed 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 contacts.3) <i>Required:</i> School notifies* school contacts of an exposure.4) <i>Required:</i> School submits contact information for case and contacts using the COVID-19 Case and Contact Line List for the Educational Sector and sends to PPHD by secure email: nursing@cityofpasadena.net5) <i>Recommended:</i> School sends general notification* to inform the wider school community of the school exposure and precautions taken to prevent spread. <p>* Notification letter templates are available at: COVID-19 Template Notification Letters for Education Settings.</p>
2 Confirmed 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 determines 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+ Confirmed Cases	<ol style="list-style-type: none">1) <i>Required:</i> If a cluster of 3 or more cases occurred within 14 days of each other, school notifies PPHD at: nursing@cityofpasadena.net or (626) 744-6089, option 2. PPHD, with information gathered by the school, determines whether the cases have epi links. If epi links <u>do not</u> exist, the school continues with routine exposure management.2) <i>Required:</i> PPHD requests that the COVID-19 Case and Contact Line List for the Educational Sector be completed by the school to determine if outbreak criteria have been met. If outbreak criteria are met, PPHD outbreak investigation will be initiated.3) <i>Required:</i> School provides updates to the PPHD investigator until the outbreak is resolved (at least 14 days since last confirmed case).