ORCHARD PARK CENTRAL SCHOOL DISTRICT



DISTRICT-WIDE SAFETY PLAN 2022-23

TABLE OF CONTENTS

INTRODUCTION

Section 1: GENERAL CONSIDERATIONS

- A. Purpose
- B. Identification of School Teams
- C. Concept of Operations
- D. Plan Review and Public Comment
- E. Prevention/Intervention Strategies
- F. Early Detection of Potentially Violent Behavior
- G. Hazard Identification

Section 2: GENERAL EMERGENCY RESPONSE PLANNING

- A. Training, Drills and Exercises
 - Emergency Closing
 - Early Dismissal
 - Evacuation (Before, During and After School Hours)
 - Shelter in Place
 - Hold in Place
 - Lockdown
 - Lockout
- B. Implementing School Security

SECTION 3: RESPONDING TO THREATS AND ACTS OF VIOLENCE

A. Policies and Procedures for Responding to Implied or Direct Threat of Violence by Students, Teachers, Visitors and Others

Communication

- 1. Code of Conduct
- 2. Policy 7313: Student Suspensions
- 3. Policy 7360: Weapons in School
- 4. Policy 7320: Alcohol, Drugs, and Other Substances (Students)
- 5. Policy 6150: Alcohol, Drugs, and Other Substances (Personnel)
- 6. Policy 7551: Sexual Harassment of Students
- 7. Policy 6121: Sexual Harassment of District Personnel
- 8. Policy 7550: Dignity for All Students
- 9. Policy 7552: Bullying: Peer Abuse in Schools
- 10. Policy 7540: Suicide
- B. Situational Response
- C. Response Protocols
- D. Resources/Vehicles

SECTION 4: POST-INCIDENT COORDINATION & COMMUNICATION

A. Coordination with emergency services organizations and local government agencies

SECTION 5: PREVENTION & INTERVENTION STRATEGIES

- A. Overview of Prevention and intervention strategies
- B. Description of duties/training of monitors and other school safety personnel

Appendix 1

ORCHARD PARK CENTRAL SCHOOL DISTRICT-WIDE SAFETY PLAN

INTRODUCTION

The District considers the safety of its students and staff to be of the utmost importance and is keenly aware of the evolving nature of threats to schools. As such, it will address those threats accordingly through appropriate emergency response planning. The District-wide school safety plan and the building-level emergency response plan(s) will be designed to prevent or minimize the effects of violent incidents and emergencies and to facilitate the coordination of schools and the District with local and county resources in the event of these incidents or emergencies. These plans will be reviewed and updated by the appropriate team on at least an annual basis and adopted by the Board by September 1 of each school year.

The Board will make the District-wide school safety plan available for public comment at least 30 days prior to its adoption. The District-wide school safety plan may only be adopted by the Board after at least one public hearing that provides for the participation of school personnel, parents, students, and any other interested parties. The District-wide school safety plan and any amendments must be submitted to the Commissioner, in a manner prescribed by the Commissioner, within 30 days of adoption, but no later than October 1 of each school year.

Building-level emergency response plan(s) and any amendments must be submitted to the appropriate local law enforcement agency and the state police within 30 days of adoption, but no later than October 1 of each school year. Building-level emergency response plan(s) will be kept confidential and are not subject to disclosure under the Freedom of Information Law (FOIL) or any other provision of law.

District-Wide School Safety Plan

District-wide school safety plan means a comprehensive, multi-hazard school safety plan that covers all school buildings of the District, addresses crisis intervention, emergency response and management at the District level, and has the contents as prescribed in Education Law and Commissioner's regulations.

The District-wide school safety plan will be developed by the District-wide school safety team appointed by the Board. The District-wide school safety team will include, but not be limited to, representatives of the Board, teacher, administrator, and parent/community representation, school safety personnel, and other school personnel.

Section I: General Considerations and Planning Guidelines:

A. Purpose

The Orchard Park Central School district-wide School Safety Plan was developed pursuant to Commissioner's Regulation 155.17. At the direction of the Orchard Park School District Board of Education, the Superintendent of the Orchard Park School District appointed a district-wide School Safety Team and charged it with the development and maintenance of the District wide School Safety Plan. This membership was subsequently approved by the Board of Education.

B. Identification of School Teams

The Orchard Park District has appointed a district-wide School Safety Team consisting of, but not limited to, representatives of the school board, students, teachers, administrators, parent/community representatives, school safety personnel and other school personnel. The members of the team and their positions or affiliations are as follows:

Name	Building	Position
Lisa Krueger, Ed.D.	District Office	Asst. Supt. Curriculum & Instruction
Jennifer Rogers, M.D.	Board of Education	Board of Education representative
Ryan Cimo	Board of Education	Board of Education Representative
Tom Provost	Board of Education	Board of Education representative
Off. Kristen Mazur	Orchard Park Police	Orchard Park Police & DARE officer
Off. Courtney Mackey	Orchard Park Police	Orchard Park Police & OPHS SRO
Off. John Starr	Orchard Park Police	Orchard Park Police & OPMS SRO
Joe Carrus	Erie 2 BOCES	Safety Risk Coordinator
Jeff Petrus	District Office	Asst. Supt. Business
Bill Bosinski	District Office	Director of Buildings & Grounds
Sarah Hornung	District Office	Director of Technology
Joe Haier	District Office	Transportation Dept.
Kathryn Tashjian	District Office	Psychologist, PPS representative
Scott Roth	District Office	Technology
Dave Hack	High School	Director of Athletics

OP High School	House 2 Principal
OP Middle School	Assistant Principal
Eggert Elementary	Principal
Ellicott Elementary	Principal
South Davis Elementary	Principal
Windom Elementary	Principal
OP High School	Social Worker, PPS representative
OP High School	Teacher
OP High School	OPTA President, Teacher
OP Middle School	Teacher
Eggert Elementary	Teacher
Ellicott Elementary	Teacher
South Davis Elementary	Occupational Therapist
Windom Elementary	Teacher
Windom Elementary	Custodian
District Offices	Clerical, SRP representative
OP Resident	Community Member/Parent
	CP Middle School Eggert Elementary Ellicott Elementary South Davis Elementary Windom Elementary OP High School OP High School OP Middle School Eggert Elementary Ellicott Elementary South Davis Elementary Windom Elementary Windom Elementary District Offices

C. Concept of Operations

The methodology used for development of the district-wide plan began well before the SAVE legislation was passed in New York State. In its early beginnings collaborative meetings were held with district administrators that included the local chief of police, district fire chief, commander of the local police SWAT team and emergency services coordinator for the town. To ensure coordination between the district-wide School Safety Plan and the individual Building-Level Emergency Response Plans, each building administrator on the district-wide committee serves as the building chairperson for his respective building.

During that time it was determined that, based upon incidents in the general Western New York area, schools needed to plan for situations dealing with violence and hostage situations, biological hazard threats, natural disasters, bomb threats and fires. A critical determination at that time was made that determined which agency was in charge in each particular set of circumstances.

Building response teams, depending on the nature of the situation, will notify appropriate community emergency services and the superintendent's office.

When needed and notified, appropriate police, fire and emergency medical services will be dispatched to the sites for assistance and management of the situation when and where appropriate.

Since the original drafting of this document over a decade ago, our District has invested in Incident Command Structure (ICS) training to ensure the highest level of communications and shared language between and among District personnel and emergency services, and local/state/federal agencies.

D. Plan Review and Public Comment

- This plan shall be reviewed and maintained by the district-wide School Safety

 Team and reviewed on an annual basis on or before July 1 of each year.
- Pursuant to Commissioner's Regulation 155.17 (e)(3), this plan will be made available for public comment 30 days prior to its adoption. The School Board will adopt the district-wide and building-level plans only after at least one public hearing that provides for the participation of school personnel, parents, students and any other interested parties. The plan shall be formally adopted by the Board of Education.
- Building-Level Emergency Response Plans are confidential and not submit to disclosure under Article 6 of the Public Officers Law or any other provision of law, in accordance with Education Law Section 2801-a.
- Full copies of the district-wide School Safety Plan and any amendments will be made available to the public and the New York State Education Department within 30 days of adoption via the District website. Building-Level Emergency Response Plans will be supplied to both local and State Police within 30 days of adoption, and to New York State Education Department via the Business Portal.

E. Prevention/Intervention Strategies

The Orchard Park Central School District has a commitment to educating and training our personnel. Prevention of violent, disruptive, and/or unsafe situations is the goal, but when a crisis occurs, it is imperative personnel are prepared and equipped to mitigate a situation. The District Safety Committee regularly reviews and provides input regarding the training provided to all staff and/or training provided to select groups of personnel.

Student programs are offered to support the social-emotional well being of students, to decrease violent/disruptive instances and bullying, and to promote a safe school environment and culture.

Examples of Preventive Student Programs and Supports include:

1. Drug Abuse Resistance Education (DARE)

- 2. Character Education programs and special events (i.e. Rachel's Challenge)
- 3. Olweus Bullying Prevention Program
- 4. Social skills groups and counseling for students
- 5. Peer Mediation/Conflict Resolution
- 6. Freshman Boost Classes
- 7. Student Wellness and Role Model Program (at OPHS)
- 8. Individual counseling for students
- 9. Collaboration with community service providers (i.e. "wrap" services, outside counselors/psychologists)
- 10. Parent Information Series (mental health topics such as suicide awareness)
- 11. Professional Development opportunities for staff to enhance our effectiveness in crisis prevention, intervention and student support. Examples include:
 - a. Crisis Prevention & Intervention (CPI) training
 - b. FEMA Incident Command Structure (ICS) training
 - c. Suicide Awareness training
 - d. Mental Health Awareness training

Each school building cultivates an atmosphere where students feel comfortable in talking with administration and teachers in their buildings regarding the welfare of the student body. This provides building staff with a level of awareness from the student's point of view that is extremely valuable in staying vigilant should a potential problem begin to develop.

G. Hazard Identification

- 1. In addition to our six (6) instructional buildings within the district, there are other potential sites where emergencies could arise. These locations are regularly used by students and the community and should be considered by school personnel overseeing student activities. Examples include:
 - a. District Office / Transportation Facilities (2240 Southwestern Blvd., West Seneca)
 - b. Stadium sports complex (3909 Freeman Road, north of high school, which contains football, track, lacrosse, soccer, baseball fields)
 - c. Buildings and Grounds Office (white house at 3901 North Freeman)
 - d. District Maintenance and Grounds Bldg. (60 South Lincoln Avenue, Orchard Park)
 - e. Quaker Arts Pavilion (behind Middle School)
 - f. Project Adventure site (behind Pavilion at Middle School)
 - g. District Playgrounds (adjacent to elementary schools)
 - h. Orchard Park Soccer Complex (6909 Milestrip Road, Orchard Park)
- 2. Examples of potential disaster sites within the town, which could directly or indirectly impact the safety of our students and staff and/or District operations:
 - a. HighMark Blue Cross Blue Shield Stadium (Buffalo Bills NFL Stadium) at the intersection of Southwestern Blvd., Abbott Road, and Big Tree Road.
 - b. Quaker Mill Works (South Davis Road)
 - c. 84 Lumber (Big Tree Road and California Drive)
- 3. Examples of situations that could impact District operations or disasters that could impact safety:
 - a. Traffic and student transportation when the Buffalo Bills stadium is in use.
 - b. A terrorist attempt/attack at Buffalo Bills stadium due to the high-profile nature of a public venue with crowds of 80,000+.
 - c. Fire, Chemical, and/or Hazard materials in industrial complexes and lumber warehouses located in close proximity to school sites.

F. Early Detection of Potentially Violent Behavior

Through the efforts of the district health office and school psychologists, materials have been made available to staff that illustrate characteristics of students who are potentially at risk. In accordance with the emergency regulatory measures passed by the Board of Regents in July 2016, staff participated in mental health awareness training. Newly hired staff will receive this training in addition to Olweus Bullying Prevention Program training. It is expected that all permanent school personnel regularly working directly with students receive this training within their first year of employment. Training will also be offered to employees who are not regularly and/or directly working with students (i.e. seasonal employees, per diem employees, etc.), and their participation will be encouraged.

The content of the training includes protocol to be followed in the event of an incident. Each school has personnel training in the Threat Assessment model, so a timely and appropriate response is made once a student exhibits behavior that would warrant a response or investigation.

Building administrators, counselors and social workers are available daily for consultation with staff, students, parents and community members. Building parent-teacher organizations provide opportunities for the free exchange of ideas and concerns. Class meetings, as prescribed in the Olweus Bullying Prevention Program, also offer opportunities for dialogue regarding school climate and behavior. PTO organizations and student government organizations (secondary) discuss related matters at meetings.

Middle School students (grades 6, 7 & 8) are assigned to grade level teams that have a common core of four teachers and planning time on a daily basis. Students have the same administrator and counselor over three years.

High School students (grades 9, 10, 11, & 12) are assigned to one of three separate building houses where they will have the same homeroom teacher, counselor, house principal and secretarial support staff for four consecutive years.

These configurations enhance the comfort level of students and parents in reporting situations of concern to an appropriate and responsible adult.

Section 2: GENERAL EMERGENCY RESPONSE PLANNING

A. Training, Drills, and Exercises

Opportunities for initial training for staff have included instruction programs presented jointly by both the New York State and Orchard Park Police agencies on separate conference days for secondary, elementary and SRP staff members. Building safety committees have applied this background to both building and program needs unique to each age level of both students and building configurations. Building staff meetings have helped to bring the total staff together to discuss building decisions.

The District will provide the following trainings annually. New employees will be assigned to attend these trainings in accordance with their role in the district, and in consultation with the District Safety Coordinator/Assistant Superintendent for Curriculum and Instruction and the employee's direct supervisor.

- Emergency Response Protocol training
- Olweus Bullying Prevention training
- Stop the Bleed training
- Mental Health Awareness
- District Safety Committee and Building Safety Teams may participate in additional training, including:
 - PREPaRE crisis prevention and intervention
 - Threat Assessment Training, based on the Virginia Threat Assessment Model
 - FEMA Incident Command Structure training
- Select groups of employees receive specialized trainings, including:
 - Monitors undergo annual training in situational awareness, procedures, deescalation techniques and emergency response
 - Crisis Prevention & Intervention (CPI)
 - Mass injury and casualty response (school nurses)

In terms of drills, each building is required to conduct separate drills and exercises each year with the students and staff, with the cooperation and participation of the Orchard Park Police and fire officials when debriefing is part of the process. (Shelter in place, lockdown, evacuation, relocation, district-wide early dismissal). Each building will be required to keep a log of training offered and drills conducted.

The District may utilize the following procedures to respond to an emergency:

1. Emergency Closing/School Cancellation

a. The Superintendent or his/her designee has the authority to close school. An internal coordinated communication plan has been established to notify local media stations designated by the Board of Education.

- b. When school is closed, all related activities, including athletic events and student activities will be suspended for that day and evening.
- c. The following media stations will be notified:
 - WBEN, radio
 - WGRZ, television
 - WIVB, television
 - WKBW,television
- d. Note: the District has specific detailed plans, which will not be publically shared in this document.

2. Early Dismissal

- a. Typically this will only be used when announced ahead of time so parents can plan for early arrival of children. An early exit at the high school may only be done to allow more driving time for buses and to purposely allow middle and elementary runs to remain as close to schedule as possible. Unscheduled early dismissals will be conducted by evacuating to another district building with public notification by radio and television.
- b. Note: the District has specific detailed plans, which will not be publically shared in this document.

3. Evacuation

- a. In the event of an imminent emergency that requires evacuation of the building, the building principal or his/her designee may activate these procedures. In the event of an imminent emergency, standard fire evacuation procedures will be used.
- As time permits, students will prepare for an evacuation, including retrieving coats, lunches, books, etc.
- c. The building principal or designee will coordinate with district office and transportation.
- d. Note: the District has specific detailed plans, which will not be publically shared in this document.

4. Shelter in Place

- a. Shelter in Place is utilized when students and staff are required to remain indoors, perhaps for an extended period of time, because it is safer inside the building/room than outside.
- b. Should weather threaten transportation, use of media will be used to alert parents to the delay of district transportation. Individual district staff will provide

- care to include food and water while retaining staff to handle the supervision of students held in the building until transportation home is possible.
- c. Note: the District has specific detailed plans, which will not be publically shared in this document.

5. Hold in Place

- a. An internal incident or administrative matter, such as students fighting in a hallway, maintenance issue or medical emergency that requires staff and students movement be limited, a Hold in Place may be initiated.
- b. Note: the District has specific detailed plans, which will not be publically shared in this document.

6. Lockdown

- a. While the principal or his/her designee generally initiates the aforementioned procedures, anyone can initiate a lockdown. In the event of an imminent emergency that requires specific lockdown procedures, a lockdown can be initiated by anyone in the building at any time. An individual yells, "Lock Down, Lock Down," and anyone able to do so will call the main office so an announcement can be made.
- b. Note: the District has specific detailed plans, which will not be publically shared in this document.

7. Lockout

- a. A lockout is the response to an actual or perceived threat from outside the school building.
- b. Note: the District has specific detailed plans, which will not be publically shared in this document.

B. Implementing School Security

Building administrators have the authority to determine the following:

- 1. Entrance and hall monitoring practices based upon building configurations, locked doors and age level of students
- 2. Visitor, substitute sign in and identification badge use

- 3. Planning and timing of secondary school drug searches using police dogs
- 4. Recommendations to the district-wide safety committee, the administrative cabinet and superintendent of schools
- 5. The timing of custodial building checks during the weekend as well as during the week

Vital Educational Agency Information

Each building has prepared building schedules, class lists by periods, staff rosters, and their daily school day locations, parent home and work phone numbers, plus lists of telephone numbers of district and building officials needed to implement the safety plan.

Section 3: RESPONDING TO THREATS AND ACTS OF VIOLENCE

In the event of a violent incident, potential incident, or intruder on school grounds (direct or implied threats), the building office staff or administrator will contact the Orchard Park Police at 911 or 662-6444. The superintendent's office will immediately be notified if another level of help is needed or if the seriousness of the situation (scope or intensity) would warrant it.

A. The Orchard Park Central School District has policies and procedures for responding to implied or direct threats of violence by students, teachers, other school personnel and visitors to the school. Board of Education policies are on file and accessible via the District website to all school personnel. In addition, corresponding Administrative Regulations supplement some policies to provide additional detail for school administrators.

Policies related to school safety include:

- 1. District Code of Conduct
- 2. Policy 7313: Student Suspensions
- 3. Policy 7360: Weapons in School
- 4. Policy 7320: Alcohol, Drugs, and Other Substances (Students)
- 5. Policy 6150: Alcohol, Drugs, and Other Substances (Personnel)
- 6. Policy 7551: Sexual Harassment of Students
- 7. Policy 6121: Sexual Harassment of District Personnel
- 8. Policy 7550: Dignity for All Students
- 9. Policy 7552: Bullying: Peer Abuse in Schools
- 10. Policy 7540: Suicide

B. Communication

The district makes use of the following methods of communication for all school facilities within the district:

1. Regular telephone system/cell phone system with numbers as follows:

Person	Position	School Phone	Cell (confidential)
David Lilleck	Superintendent	(716) 209-6280	confidential
Lisa Krueger	Asst. Supt. of Curriculum	(716) 209-6236	confidential

Dr. Dean Ramirez	Asst. Supt. of Personnel	(716) 209-6239	confidential
Jeff Petrus	Asst. Supt. of Business	(716) 209-6209	confidential
Dave Hack	Director of Athletics/P.E.	(716) 209-6208	confidential
Bill Bosinski	Director of Facilities	(716) 209-6207	confidential
Joe Haier	Transportation Supv.	(716) 209-6237	confidential
Mike Connors	Grounds Supervisor	(716) 209-6455	confidential
Julianne Becker	Public Relations	(716) 209-6222	confidential

- 2. District-wide radio system
- 3. Telephone (VOIP) speaker system
- 4. Building intercom (High School, Middle School, Eggert, Ellicott, South

Davis and Windom)

5. Building internal radio system – multi channel (non FCC registered)

Parent Communications & Public Communications

Depending on the nature of the incident and the most effective method of communications, District-wide parent communications may occur by use of the following communication tools:

- 1. Mass text notifications to families
- 2. Mass audio notifications to families (i.e. "robocalls")
- 3. Mass email notifications to families
- 4. Individual phone calls, emails to families

In the event of a general notification, the following communication tools may be utilized.

- 5. District website
- 6. Local media (radio, television, newspaper)
- 7. District social media (Facebook, Twitter)

As part of the Incident Command Structure, a Communication Liaison will be designated.

Depending on the nature of the incident, communications with non-public schools and the Erie 2 BOCES Alternative Education school on Baker Road may occur. Their contact information is as follows.

School	Contact
Erie 2 BOCES Alternative Education School 3330 Baker Road Orchard Park	Mr. Tim Lasky, Principal Cell: confidential Office: (716) 662-0135 ext. 6003
Nativity of Our Lord	Mrs. Colleen Scott, Principal
43 Argyle Place	Cell: confidential
Orchard Park	Office: (716) 662-7572
St. John Vianney	Ms. Christine Hider
2950 Southwestern Blvd.	Cell: confidential
Orchard Park	Office: (716) 674-9232

C. Situational Response

Plans have been developed through the district committees that deal with the following situations:

- 1. Intruder, violence, hostage *
- 2. Biological, hazardous material *
- 3. School bus accident

- 4. Bomb threat *
- 5. Natural weather related early dismissal, school cancellation
- 6. Fire
- 7. Suspicious mail (arriving at central office sorting station)

The district staff, including teachers, school-related personnel and school administrators, have been trained in de-escalation techniques by the New York State and Orchard Park Police at past seminars held on superintendent's conference days. Follow up sessions will be held at both the district and building level when staff and presenters are mutually available. An outline of early warning signs has been given to staff along with an appropriate response protocol.

In all cases the building principal or designee is immediately informed of the situation via staff members who may notify the superintendent of implied or direct threats. This may also involve immediate contact of Orchard Park Police or the monitoring of the situation before police are initially called.

^{*} Part of Building Plan

D. Response Protocols:

In cases of intruders (hostages), biological hazard, or bomb threats, a specific response protocol is outlined for the building level, which integrates a district response team involvement.

Depending upon the nature of the situation, the following people (agencies) are in charge as follows:

- 1. Intruder, violence or hostage threat: highest ranking responding Orchard Park Police Officer.
- 2. Biological, hazardous material or radiological threat: highest ranking fire official Orchard Park Fire District.
- 3. Bomb threat: Building principal or ranking district office administrator.

Procedures to safeguard staff include shut downs, lockdowns (secondary), level I and level II (elementary) actions at the building level, building evacuation, or site evacuation by district transportation.

Crime scene management, as outlined on the attachment, will be utilized to protect the potential crime scene by preserving evidence.

Procedures to inform parents include use of the local radio and television media as well as direct telephone calls to parents where only building personnel or response team member involves a few people.

Use of the Orchard Park Central District Fire Station, other peripheral fire halls, and the district office will allow parents to convene at a local site within the district for timely information updates.

Responses to arriving parents will be based on the best information made available approximately every half hour. Most information will come from local command posts set up by the appropriate agencies in charge at the site of the occurrence.

Local Government Response

As a result of multiple meetings with local police, disaster and fire officials, group plans have been made in advance for appropriate responses of those agencies. Debriefings occur with police and EMS personnel after drills. Calls for assistance would be coordinated through the Orchard Park Chief of Police and/or town supervisor's office if requested by the Superintendent or one of his assistants.

5. Resource Coordination

Vehicles & Transportation

Use of the district's bus fleet and drivers, maintenance staff and trucks, as well as large group facilities at the schools in the district will provide opportunities for transportation, evacuation procedures and evacuation sites, as well as control of traffic around district facilities affected by the problem. Food and water are available to support all building individuals for approximately three days.

Coordinating District Resources and Manpower

Through the district-level Response Team, offices of the Superintendent, Assistant Superintendents, Director of Health, Physical Education & Athletics, and Supervisor of Buildings & Grounds, appropriate decisions are made to supplement procedures established with local police, fire officials and emergency response agencies.

All administrators are trained in the FEMA Incident Command Structure and utilize this coordination and communication structure to ensure internal communications and communications with outside organizations (i.e. law enforcement, first responders, media, etc.) are coordinated.

SECTION 4: POST-INCIDENT COORDINATION & COMMUNICATION

- A. District Support for Buildings. Through the efforts of the Assistant Superintendent of Curriculum and Pupil Services, a post crisis team plan has been developed to supplement the building level post incident efforts.
- B. Disaster Mental Health Services. The district wide post incident team may consist of additional counselors from other district schools, along with psychologists and social workers from our district's department of pupil services. Referrals for both individual and small group counseling beyond the school efforts will be made to the appropriate community agencies when additional or long term recovery is needed.

SECTION 5: BUILDINGS COVERED BY THE DISTRICT SAFETY PLAN

Building	Address	Admin/Principal	Telephone
Eggert Elementary	3580 Eggert Rd Orchard Park	Missy Szczesniak	(716) 209-6215
Ellicott Elementary	5180 Ellicott Rd Orchard Park	Diana Nigro	(716) 209-6278
South Davis Elementary	51 S. Davis Rd Orchard Park	Jeff Dolce	(716) 209-6246
Windom Elementary	3870 Sheldon Rd Orchard Park	Philip Johnson	(716) 209-6279
Middle School (gr. 6-8)	60 S. Lincoln Ave Orchard Park	Aaron Grupka	(716) 209-6220
High School (gr.9- 12)	4040 Baker Rd Orchard Park	Jon Wolf	(716) 209-6242
District Office	2240 Southwestern Blvd.West Seneca	David Lilleck	(716) 209-6280
District Transportation	2240 Southwestern Blvd.West Seneca	Joe Haier	(716) 209-6237 or 6238
D.O.Conference & Learning Center	2240 Southwestern Blvd. West Seneca	Lisa Krueger	(716) 209-6236 or
Buildings & Grounds Office	3901 N. Freeman Rd. Orchard Park	Bill Bosinski	(716) 209-6207

OPCSD Continuation of Operations Plan

~Amendment to the District Safety Plan~

January 2021

Background

In response to the COVID-19 pandemic, Governor Cuomo signed into law Chapter 168 of the Laws of 2020 that requires public employers, including public school districts, to adopt a continuation of operations plan in the event that the governor declares a public health emergency involving communicable disease. The legislation amends subdivision 2 of section 2801-a of New York Education Law to require that District Safety Plans include protocols for responding to a declared public health emergency involving a communicable disease that are "substantially consistent" with the provisions of section 27-c of the Labor Law.

Note: The Governor's Approval Memo indicates there will be a technical chapter amendment to this bill, which will push out the due date the plans are due to April 1, 2021. There may be additional changes added to the language at that time.

Promulgation

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and I of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. This plan has been developed with the input of the Orchard Park Central School District Central Office Administrators, Principals Association, Teachers' Association, and School Related Personnel labor unions, as required by the amended New York State Labor Law.

No content of this plan is intended to impede, infringe, diminish, or impair the rights of us or our valued employees under any law, rule, regulation, or collectively negotiated agreement, or the rights and benefits which accrue to employees through collective bargaining agreements, or otherwise diminish the integrity of the existing collective bargaining relationship. This plan has been approved in accordance with requirements applicable to the agency, jurisdiction, authority, or district, as represented by the signature of the authorized individual below.

Attestation

As the authorized official of the Orchard Park Central School District, I hereby attest that this plan has been developed, approved, and placed in full effect in accordance with S8617B/A10832 which amends New York State Labor Law section 27-c and New York State Education Law paragraphs k and I of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable, to address public health emergency planning requirements.

Signed on this day:
Date:
By: Matthew McGarrity
Signature:
Superintendent of Schools

Table of Contents

Topic	Page Number
Definitions	29
Purpose	29
Scope	30
Situation Overview	30
Planning Assumptions	30
Concept of Operations	31
Mission Essential Functions	32
Essential Functions & Essential Positions	33
Reducing Risk Through Remote Work & Staggered Shifts	36
Remote Work Protocols	36
Staggered Shifts	36
Personal Protective Equipment (PPE)	37
Cleaning & Disinfection	38
Staff Exposures	40
Employee and Contractor Leave	42
Documentation of Work Hours and Locations	42
Housing for Essential Employees	43

Definitions

Communicable disease: shall mean an illness caused by an infectious agent or its toxins that occurs through the direct or indirect transmission of the infectious agent or its products from an infected individual or via an animal, vector or the inanimate environment to a susceptible animal or human host.

Contractor: shall mean an individual performing services as party to a contract awarded by the state of New York or any other public employer defined in paragraph b of this subdivision.

Essential employee: shall refer to a designation made that a public employee or contractor is required to be physically present at a work site to perform his or her job.

Non-essential employee: shall refer to a designation made that a public employee or contractor is not required to be physically present at a work site to perform his or her job.

Personal protective equipment (PPE): shall mean all equipment worn to minimize exposure to hazards, including gloves, masks, face shields, foot and eye protection, protective hearing devices, respirators, hard hats, and disposable gowns and aprons.

Public employer or employer: shall mean the state of New York, a county, city, town, village or any other political subdivision or civil division of the state, a public authority, commission or public benefit corporation, or any other public corporation, agency, instrumentality or unit of government which exercises governmental power under the laws of this state, provided, however, that this subdivision shall not include any employer as defined in section twenty-eight hundred one-a of the education law.

Retaliatory action: shall mean the discharge, suspension, demotion, penalization, or discrimination against any employee, or other adverse employment action taken against an employee in the terms and conditions of employment.

Purpose

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and I of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. These laws were amended by the passing of legislation S8617B/A10832 signed by the Governor of New York State on September 7, 2020, requires public employers to adopt a plan for operations in the event of a declared public health emergency involving a communicable disease. The plan includes the identification of essential positions, facilitation of remote work for non-essential positions, provision of personal protective equipment, and protocols for supporting contact tracing.

Scope

This plan was developed exclusively for and is applicable to the Orchard Park Central School District. This plan is pertinent to a declared public health emergency in the State of New York which may impact our operations; and it is in the interest of the safety of our employees and contractors, and the continuity of our operations that we have promulgated this plan.

Situation Overview

On March 11, 2020 the World Health Organization declared a pandemic for the novel coronavirus which causes the COVID-19 severe acute respiratory syndrome. This plan has been developed in accordance with amended laws to support continued resilience for a continuation of the spread of this disease or for other infectious diseases which may emerge and cause a declaration of a public health emergency.

The health and safety of our employees and contractors is crucial to maintaining our mission essential operations. We encourage all employees and contractors to follow the CDC Guidance for Workplace Safety.

The fundamentals of reducing the spread of infection include:

- Using hand sanitizer and washing hands with soap and water frequently, including:
 - After using the restroom
 - o After returning from a public outing
 - After touching/disposing of garbage
 - o After using public computers, touching public tables, and countertops, etc.
- Practice social distancing when possible;
- If you are feeling ill or have a fever, notify your supervisor immediately and go home;
- If you start to experience coughing or sneezing, step away from people and food, cough or sneeze into the crook of your arm or a tissue, the latter of which should be disposed of immediately;
- Clean and disinfect workstations at the beginning, middle, and end of each shift;
- Other guidance which may be published by the CDC, the State Department of Health, or County health officials

Planning Assumptions

This plan was developed based on information, best practices, and guidance available as of the date of publication. The plan was developed to largely reflect the circumstances of the current Coronavirus pandemic but may also be applicable to other infectious disease outbreaks.

The following assumptions have been made in the development of this plan:

- The health and safety of our employees and contractors, and their families, is of utmost importance;
- The circumstances of a public health emergency may directly impact our own operations;
- Impacts of a public health emergency will take time for us to respond to, with appropriate safety measures put into place and adjustments made to operations to maximize safety;
- The public and our constituency expects us to maintain a level of mission essential operations;
- Resource support from other jurisdictions may be limited based upon the level of impact the public health emergency has upon them;
- Supply chains, particularly those for personal protective equipment (PPE) and cleaning supplies, may be heavily impacted, resulting in considerable delays in procurement;
- The operations of other entities, including the private sector (vendors, contractors, etc.), non-profit organizations, and other governmental agencies and services may also be impacted due to the public health emergency, causing delays or other disruptions in their services;
- Emergency measures and operational changes may need to be adjusted based upon the specific circumstances and impacts of the public health emergency, as well as guidance and direction from public health officials and the governor;
- Per S8617B/A10832, 'essential employee' is defined as a public employee or contractor that is required to be physically present at a work site to perform their job;
- Per S8617B/A10832, 'non-essential employee' is defined as a public employee or contractor that is not required to be physically present at a work site to perform their job.

Concept of Operations

The Superintendent of Schools of the Orchard Park Central School District, their designee, or their successor holds the authority to execute and direct the implementation of this plan. Implementation, monitoring of operations, and adjustments to plan implementation may be supported by additional personnel, at the discretion of the Superintendent of Schools.

Upon the determination of implementing this plan, all employees and contractors of Orchard Park Central School District shall be notified by email, with details provided as possible and necessary, with additional information and updates provided on a regular basis. Employees, parents, and Board trustees will be notified of pertinent operational changes by way of email notification. Other interested parties, such as vendors, will be notified by phone and/or email as necessary. The public relations coordinator will maintain communications with the public and constituents as needed throughout the implementation of this plan.

The Superintendent of Schools, their designee, or their successor will maintain awareness of information, direction, and guidance from public health officials and the Governor's office, directing the implementation of changes as necessary.

Upon resolution of the public health emergency, the Superintendent of Schools, their designee, or their successor will direct the resumption of normal operations or operations with modifications as necessary.

Mission Essential Functions

When confronting events that disrupt normal operations, the Orchard Park Central School District is committed to ensuring that essential functions will be continued even under the most challenging circumstances.

Essential functions are those functions that enable an organization to:

- 1. Maintain the safety of employees, contractors, and our constituency;
- 2. Provide vital services;
- 3. Provide services required by law;
- 4. Sustain quality operations;
- 5. Uphold the core values of the Orchard Park Central School District.

The Orchard Park Central School District has identified as critical only those priority functions that are required or are necessary to provide vital services. During activation of this plan, all other activities may be suspended to enable the organization to concentrate on providing the critical functions and building the internal capabilities necessary to increase and eventually restore operations. Appropriate communications with employees, contractors, our constituents, and other stakeholders will be an ongoing priority.

Essential functions are prioritized according to:

- The time criticality of each essential function;
- Interdependency of a one function to others;
- The recovery sequence of essential functions and their vital processes.

Priority 1 identifies the most essential of functions, with priority 4 identifying functions that are essential, but least among them.

Essential Functions

The Orchard Park Central School District has determined the following functions are deemed essential to the fulfillment of our mission.

Role	Detail and Rationale
District Administration & Clerical Support	Required to ensure the fulfillment of our educational mission and continuity of the response efforts in the event of a public health emergency.
Building Administration & Clerical Support	Required to ensure the fulfillment of our educational mission and continuity of the response efforts in the event of a public health emergency.
Buildings & Grounds	If schools are directed to provide meals to students and families as outlined above custodians and laborers will be essential in maintaining the safety of our schools and workplace. Snow removal, daily sanitation and cleaning, etc. will be necessary if personnel are working within our schools food meal or instructional resource distribution.
Business Office	Essential functions are, at minimum, payroll and accounts payable. Dependent on the public health emergency, purchasing (of supplies and equipment) and accounts payable may serve essential functions.
Food service	If schools are directed to provide meals to students and families that are eligible to receive free and/or reduced meal, personnel will be essential for this purpose.
Health services	May be essential in contact tracing, testing, reporting requirements and monitoring health of individuals on campus.
Information Technology	Provides all hardware and software for the school system. Maintains critical communication tools including the network, email and phone system. While IT is an essential function of the organization, these positions can mainly work from a remote location and may be required to occasionally be onsite for equipment maintenance, repair and/or to exchange an inoperable device for a student, teacher or staff member.
Instruction & Student Support Services	As an educational organization, our primary mission is the education of our students. Equally important is supporting the special education and mental health

	needs of our students. While it is important to articulate that mission, with the evolution of our technological resources many of these functions can shift to a staggered schedule or fully remote program where teleconferencing, distance learning and other tools are utilized to fulfill our primary mission.
Personnel	Ensuring compliance with regulation, policy, and legal requirements to ensure safety and continuation of the workforce needed to operate the District.
Safety & Security	Ensuring the safety and security of the campuses.
Transportation	If schools are directed to provide meals to students and families as outlined above, or if schools are directed to provide a continuity of instruction, transportation personnel will be essential for the distribution of meals and/or instructional resources, such as technological devices.

Essential Positions

The Orchard Park Central School District has determined the following positions are deemed essential due to the nature of the duties, the equipment needed to perform their duties, and/or the highly confidential nature of their duties that cannot be performed off-site, which are critical to the fulfillment of our mission. Note: while some functions and associated personnel may be essential, some of these can be conducted remotely and do not need to be identified in this section.

Role	Title(s)	Detail and Rationale
Food servic e	 Food Service Manager Food service employees Limited number of teacher aides for food service support 	Food service manager is responsible for accepting food deliveries and overseeing inventory. Food service employees and teacher aides are needed for meal preparation and distribution.

Trans portati on	 Transportation Supervisor Transportation clerical Bus drivers Bus aides Mechanics 	Transportation supervisor is responsible for overseeing drivers, the safety of our bus fleet, and onsite operations of the transportation department. Transportation clerical maintain communications with drivers, supporting the safety of drivers. Bus drivers and bus aides are critical in meal and instructional resource delivery. Mechanics are critical to the maintenance of our bus fleet.
Buildings & Grounds	 Superintendent of Buildings and Grounds Custodians Cleaners Laborers 	The Superintendent of Buildings and Grounds prioritizes the duties of the department and oversees all staff. Custodian and cleaners are critical to the safety (sanitation, cleaning and disinfecting) of schools fulfilling the essential functions. Laborers are critical to the maintenance of the facilities.
Busin ess Office	 Assistant Superintendent of Business Payroll Accounts Payable Accounts Receivable 	While payroll and other business office functions are essential to the organization, these positions can occasionally work from a remote location. There are times, due to the highly confidential nature of their work or the fiscal controls and procedural nature of a duty necessitates on-site work. During such occasions, staggered schedules will be considered to reduce density of people in the workplace.

Reducing Risk Through Remote Work and Staggered Shifts

Through assigning certain staff to work remotely and by staggering work shifts, we can decrease crowding and density at work sites and on public transportation. Administrators and supervisors will develop alternate/temporary schedules during a communicable disease public health emergency reflective of the priority to reduce density in the workplace, while maintaining the function and mission of the organization.

Remote Work Protocols

Non-essential employees and contractors able to accomplish their functions remotely will be enabled to do so at the greatest extent possible. Working remotely requires:

- 1. Identification of staff who will work remotely;
- 2. Approval and assignment of remote work;
- 3. Equipping staff for remote work, which may include:
- a. Internet capable laptop
- b. Necessary peripherals
- c. Access to VPN and/or secure network drives
- d. Access to software and databases necessary to perform their duties
- e. A solution for telephone communications
- i. Note that phone lines may need to be forwarded to off-site staff

Administrators and supervisors will analyze his/her department to identify staff who will work remotely and the equipment needed to successfully and efficiently work off-site.

Staggered Shifts

Implementing staggered shifts may be possible for personnel performing duties which are necessary to be performed on-site but perhaps less sensitive to being accomplished only within core business hours. As possible, administrators and supervisors will identify opportunities for staff to work outside core business hours as a strategy of limiting exposure.

Regardless of changes in start and end times of shifts, the Orchard Park Central School District will ensure that employees are provided with their typical or contracted minimum work hours per week in accordance with collective bargaining agreements and/or laws and regulations.

Staggering shifts requires:

- 1. Identification of positions for which work hours will be staggered;
- 2. Approval and assignment of changed work hours.

Administrators and supervisors of each department will alter schedules and/or create temporary schedules to provide for a reduction in workforce onsite as practicable and with consideration of chain of command and supervision of employees, building access and utilities (i.e. temperature control outside of normal business hours).

Personal Protective Equipment (PPE)

The use of personal protective equipment (PPE) to reduce the spread of infectious disease is important to supporting the health and safety of our employees and contractors.

PPE which may be needed can include:

- Masks
- Face shields
- Gloves
- Disposable gowns and aprons

Note that while cleaning supplies are not PPE, there is a related need for cleaning supplies used to sanitize surfaces, as well as hand soap and hand sanitizer. The Coronavirus pandemic demonstrated that supply chains were not able to keep up with increased demand for these products early in the pandemic. As such, we are including these supplies in this section as they are pertinent to protecting the health and safety of our employees and contractors.

The District will maintain an inventory of PPE as advised by the CDC. During the Coronavirus pandemic, the expectation was to have an inventory of six months worth of PPE. Additionally, we will utilize trusted vendors (i.e. those recommended by Erie County Department of Health) to ensure our ability to replenish PPE as needed.

Protocols for providing PPE include the following:

1. Identification of need for PPE based upon job duties and work location;

2. Procurement of PPE:

- a. As specified in the amended law, public employers must be able to provide at least two pieces of each required type of PPE to each essential employee and contractor during any given work shift for at least six months;
- b. Public employers must be able to mitigate supply chain disruptions to meet this requirement;
- 3. Storage of, access to, and monitoring of PPE stock:
 - a. PPE must be stored in a manner which will prevent degradation;
 - b. Employees and contractors must have immediate access to PPE in the event of an emergency;
 - c. The supply of PPE must be monitored to ensure integrity and to track usage rates.

The Superintendent of Buildings and Grounds will work with administrators and supervisors to determine the inventory needed to support the organization based on the number of employees, and with consideration of those working on-site versus those working off-site.

Cleaning & Disinfection

CDC/public health guidelines will be followed for cleaning and disinfection of surfaces/areas.

Present guidance for routine cleaning during a public health emergency includes:

- As possible, employees and contractors will clean their own workspaces in the beginning, middle, and end of their shifts, at a minimum.
 - a. High traffic/high touch areas and areas which are accessible to the public/constituents will be disinfected at least hourly.
 - b. identify who, by position/title, is responsible for cleaning common areas, and the frequency of such
- Staff tasked with cleaning and disinfecting areas will be issued and required to wear PPE appropriate to the task.

- 3. Soiled surfaces will be cleaned with soap and water before being disinfected.
- 4. Surfaces will be disinfected with products that meet EPA criteria for use against the virus in question and which are appropriate for that surface.
- Staff will follow instructions of cleaning products to ensure safe and effective use of the products.

The Orchard Park Central School District outlined the following protocols for during the summer of 2020 in our Reopening Plan to safely reopen schools during the COVID-19 pandemic. These guidelines will be considered and implemented, as appropriate, during communicable disease public health emergencies.

Cleaning/Disinfecting Procedures (as outlined in the Orchard Park Central School District Reopening Plan, August 2020)

The following guidelines were established during the COVID-19 pandemic in 2020, and may serve as a framework for safe operations during a public health emergency involving a communicable disease. It is the expectation of the Orchard Park Central School District that disinfecting should never be done by children (i.e. wipes, spray bottles for desks). Additionally, cleaning and disinfecting will be manually tracked and recorded through daily cleaning logs, outlining pre-arrival cleaning, cleaning done during the school day, and procedures for cleaning after the school day.

- Pre-Arrival/Arrival of Students
 - Clean and disinfect areas used by groups before the start of the school day (i.e. YMCA)
- During the School Day
 - Clean and disinfect high touch areas such as door handles, stair railings, elevator buttons, etc. after arrival and mid-day. All staff will support cleaning efforts, including classroom teachers and teacher aides to the extent practicable.
 - Bathrooms will be cleaned and disinfected frequently during the school day
- Lunches
 - Cafeterias If the cafeteria is used for lunch periods
 - Tables will be wiped down and disinfected by cafeteria monitors after each lunch period
 - Garbage will be emptied after each lunch period
 - Classrooms if eating in classrooms, cleaning to protect students with life threatening food allergies
 - During the school day, shared spaces will be cleaned between usage (i.e. desks)
 - Teachers will tie up garbage bags and leave them in the hall after lunch where custodial staff can then pick them up.
- After the School Day

- Daily procedures for cleaning and disinfecting will be completed in all student and staff areas to prepare for the next day
 - Routine cleaning includes:
 - Clean all high touch items such as light switches, door knobs, handrails, desk tops, counters, handles, faucets, etc.
 - Dust mop and/or wet mop floors
 - Empty trash receptacles and replace liners
 - Clean restrooms
 - Dust
 - Vacuum carpeted areas
- Disinfecting will occur after routine cleaning is completed
 - Spray disinfecting should not be done when the space is occupied by children. If there are adults in the room, they should be advised that disinfecting is about to occur and given the opportunity to leave.
- Playgrounds and Outdoor Areas
 - Hand sanitizing station(s) will be at playground entrance areas. Students will sanitize
 hands before/after use. Similarly, when accessing other outdoor learning spaces, hand
 sanitizing stations will be available outdoors or as students exit the building.
 - Maintain per CDC guidelines for outdoor areas: Outdoor areas generally require normal routine cleaning and do not require disinfection. Spraying disinfectant on sidewalks and in parks is not an efficient use of disinfectant supplies and has not been proven to reduce the risk of COVID-19 to the public. You should maintain existing cleaning and hygiene practices for outdoor areas. The targeted use of disinfectants can be done effectively, efficiently and safely on outdoor hard surfaces and objects frequently touched by multiple people.

Staff Exposures

Staff exposures are organized under several categories based upon the type of exposure and presence of symptoms. Following CDC guidelines, we have established the following protocols:

- 1. If employees or contractors are exposed to a known case of communicable disease that is the subject of the public health emergency (defined as a 'close contact' with someone who is confirmed infected, which is a prolonged presence within six feet with that person):
 - a. Potentially exposed employees or contractors who do not have symptoms should remain at home or in a comparable setting and practice social distancing for the duration advised by current CDC/public health guidance for the communicable disease in question.
 - b. As possible, these employees will be permitted to work remotely during this period of time if they are not ill.

- c. The Assistant Superintendent for Personnel, in conjunction with the School Physician, is responsible for ensuring these protocols are followed.
- d. See the section titled Documentation of Work Hours and Locations for additional information on contact tracing.
- 2. If an employee or contractor exhibits symptoms of the communicable disease that is the subject of the public health emergency:
 - a. Employees and contractors who exhibit symptoms in the workplace should be immediately separated from other employees, customers, and visitors. They should immediately be sent home with a recommendation to contact their physician.
 - b. Employees and contractors who exhibit symptoms outside of work should notify their supervisor and stay home, with a recommendation to contact their physician.
 - c. Employees should not return to work until they have met the criteria to discontinue home isolation per CDC/public health guidance and have consulted with a healthcare provider.
 - d. Orchard Park Central School District will not require sick employees to provide a negative test result for the disease in question or healthcare provider's note to validate their illness, qualify for sick leave, or return to work; unless there is a recommendation from the CDC/public health officials to do so.
 - e. CDC criteria for COVID-19 provides that persons exhibiting symptoms may return to work if at least 24 hours have passed since the last instance of fever without the use of fever-reducing medications. If the disease in question is other than COVID-19, CDC and other public guidance shall be referenced.
 - f. The Assistant Superintendent for Personnel, in conjunction with the School Physician, is responsible for ensuring these protocols are followed.
- 3. If an employee or contractor has tested positive for the communicable disease that is the subject of the public health emergency:
 - a. Apply the steps identified in number 2, above, as applicable.
 - b. Areas occupied for prolonged periods of time by the subject employee or contractor will be closed off.
 - i. CDC guidance for COVID-19 indicates that a period of 24 hours is ideally given before cleaning, disinfecting, and reoccupation of those spaces will take place. If this time period is not possible, a period of as long as possible will be given. CDC/public health guidance for the disease in question will be followed.
 - ii. Any common areas entered, surfaces touched, or equipment used shall be cleaned and disinfected immediately.
 - iii. See the section on Cleaning and Disinfection for additional information on that subject.

- c. Identification of potential employee and contractor exposures will be conducted:
 - If an employee or contractor is confirmed to have the disease in question, appropriate position or title or their designee should inform all contacts of their possible exposure. Confidentiality shall be maintained as required by the Americans with Disabilities Act (ADA).
 - ii. Apply the steps identified above, as applicable, for all potentially exposed personnel.
 - iii. The Assistant Superintendent for Personnel, in conjunction with the School Physician, is responsible for ensuring these protocols are followed.

We recognize there may be nuances or complexities associated with potential exposures, close contacts, symptomatic persons, and those testing positive. We will follow CDC/public health recommendations and requirements and coordinate with our local public health office for additional guidance and support as needed.

Employee and Contractor Leave

Note: In the 2020 COVID-19 pandemic, additional federal and state benefits were made available to employees to deter ill individuals from reporting to work, to provide benefits to individuals deemed close contacts and/or under Department of Health mandated quarantines. The *Families First Coronavirus Response Act of 2020*, for example, extended specific paid sick leave to employees. The Orchard Park Central School District will comply with any and all current leave requirements and benefits for our employees and contractors in accordance with state and federal law.

Additional provisions may be enacted based upon need and the guidance and requirements in place by federal and state employment laws, FMLA, executive orders, and other potential sources.

Contractors, either independent or affiliated with a contracted firm, are not classified as employees of the Orchard Park Central School District, and as such are not provided with paid leave time by name of public employer, unless required by law.

Documentation of Work Hours and Locations

In a public health emergency, it may be necessary to document work hours and locations of each employee and contractor to support contact tracing efforts. Identification of locations shall include on-site work, off-site visits. This information may be used by the Orchard Park Central School District to support contact tracing within the organization and may be shared with local public health officials.

Examples of methods of tracking attendance, work hours and locations include:

- Attendance records and timesheets
- Access control records
- Teacher/aide/student daily schedules.

Housing for Essential Employees

There are circumstances within a public health emergency when it may be prudent to have essential employees lodged in such a manner which will help prevent the spread of the subject communicable disease to protect these employees from potential exposures, thus helping to ensure their health and safety and the continuity of the Orchard Park Central School District's essential operations.

If such a need arises, hotel rooms are expected to be the most viable option. If hotel rooms are for some reason deemed not practical or ideal, or if there are no hotel rooms available, the Orchard Park Central School District will coordinate with the Town of Orchard Park emergency management office to help identify and arrange for these housing needs. The Operations Liaison, as outlined in our Incident Command Structure for emergency response, will be responsible for this function.