



COVID-19 Restart Plan

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Introduction

On March 16, 2020, Christine Valmy International School for Esthetics, Skin Care & Makeup (“Christine Valmy” or the “School”) temporarily closed its physical doors due to the mandate from Governor Cuomo and guidance from Mayor de Blasio. We have remained in “temporary distance education” status since that date, and through the time of this plan’s drafting. Our accrediting body, The Council for Occupational Education (“COE” throughout this document), granted us approval, based on federal guidelines, to operate virtually on May 11, 2020 (our initial-year accreditation with them was finalized in the end of April, 2020—prior to that, we were approved by our former accreditors, ACCSC, as of March 16, 2020); the School launched its temporary virtual platform on March 23, 2020. The federal government & our accreditors have approved temporary distance education through December, 31, 2020 (which could be reevaluated, if needed); additionally, the State of NY has approved temporary distance education and is recommending, per its new regulations, a mix of traditional in-person and remote classes.

As we prepare to step back into the “physical” world, slowly and deliberately, with our students and staff, many areas require exploration, revision and formal procedures, which this document will address, based on the Phase 4 Higher Education Guidelines, as published by the State of NY, Education Dept. on July 9, 2020. With their specific guidance, this plan took shape.

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I. Reopening

a. Capacity

The School intends to bring back students based on seniority and original schedule / graduation date. We will review where students currently stand in their clock-hour educational program. Those students with the highest number of hours, and least requirements outstanding, and based on originally scheduled graduation dates, will be the first to re-enter the building so we can complete their practical requirements and graduate them from their respective programs. These students, and their instructors, will be the ONLY members allowed to re-enter the School. The School will be closed to the public (clinic customers, School tours, etc.); much administrative personnel will continue to work remotely. Practical classrooms will be staggered with facial beds to distance them, at minimum, 6'. In order to maintain social distancing requirements, the School will repurpose theory classrooms, emptied of desks, as extra practical areas. **Those students who will NOT be returning to the building in the initial days of reopen will continue their temporary online distance education, as they are currently receiving.**

When we reopen the School will allow approximately 50 daytime students to return. During these first four weeks, we anticipate all 50 will graduate and leave the School. We will also have 29 evening Monday-Thursday 6- 9:30 students and 12 weekend students. We expect to welcome another 50 students after the 4 weeks. We intend to continue this schedule of "seniority in, graduates out" to clear the backup of students who only have practical/clinic hours remaining. Students will be required to don double-amounts of PPE at all times (face shields, masks and gloves) when touching other students/models (i.e.: facial or manicure); all inhabitants of the School (staff and students) will be required to wear face coverings at all times in the building. All student activity will be monitored under the supervision of their licensed instructors at all times.

Common areas: The School campus, aside from the classrooms, is completely open. Hallways are of large width to permit social distancing, the main lobby is spacious, without walls. There is one entrance to the

School. We will permit students/staff to enter from this doorway, one way. We will request students/staff to egress from the side stairwell, down four flights to the upper lobby where they can take an escalator the remaining floors to the street, to maintain one-way traffic into and out of the School. (Those with mobility or health issues only will be allowed to exit through the main entrance, with face covering in place.) The student lounge will be closed until further notice; all student time will be spent in their specific classroom, without wandering through the School—mobility will be limited. The School operates ladies' restrooms in the School facility; men's rooms are located on the same floor near the elevator. The School is currently the only tenant on the floor; the rest are on home operation due to COVID-19 – so the facilities will not be shared. The School does not operate residence halls. All common areas will be thoroughly cleaned from top to bottom with hospital grade disinfectant and continually cleaned by a staff of four maintenance personnel.

Offices: Office staff (student services, financial aid, enrollment) will continue to work mostly remotely—initial reopening of the School will be for students & instructors only with some administrative staff coming in occasionally during non-peak hours. Offices are individual and with windows to the exterior. Offices will not be used for meetings, so there will not be more than one person in an office at a time. Staff will be required to wear PPE. State of NY Interim Guidance for Office-Based Work during COVID-19 will be followed upon return to the School building.

Testing: The School intends to partner with a local testing company to test for active COVID-19 infection (active virus testing, from Abbott Labs) all returning faculty and students on reopen day, 7/27/2020, prior to entry into the School, and every two weeks thereafter for any new student cohorts entering the School environment. The cost will be borne by the School, not the students or staff members. Those who test positive after the approximate 10-minute period to receive results will be denied admittance and referred to their healthcare professional for further steps. Their status will be logged at the School and they will not be allowed entry without a doctor's note stating they are clear to be in public; the State Contact Testing number will be informed of the result to follow up with the student. In between COVID-19 testing times, daily temperature checks will be conducted and logged by the School. Per requirements, only student names & "pass/fail" records will be kept & individual temperatures will not be recorded. Anyone over 100°F will not be permitted to enter the School and referred to their personal physician for follow up; they will not be allowed admittance to the School without a doctor's note.

Availability of PPE: Christine Valmy has secured pallets full of PPE for use by students, staff & faculty. We currently have the following quantities in stock for a School for an overall enrollment of approximately 430 students and 40 person staff—however, we will be admitting under 75 at any one time into the School campus. We will have a comprehensive supply of the following items for the coming year:

- Disposable masks: 15,000 units
- Face shields: each student will be issued one to keep, at no cost to them: 3000 units
- Disposable gloves: 20,000 pairs in varying sizes (S-XL)
- Hand sanitizer at all stations and throughout the School.
- Moveable physical barriers/drapes to set up between facial beds and nail stations: 50

Quarantine & Isolation Capacity: One makeup classroom is being emptied of its contents and prepared as a quarantine unit, should a student or staff member come down with symptoms of ANY illness. The student will remain in this area while the local Department of Health is contacted; the nearest office is: 455 1st Avenue, (212) 447-2030, beside the Empire State Building.

Local Medical Capacity: The nearest hospitals to our School is: Mount Sinai West, at 1000 10th Avenue, New York, NY 10019 & N.Y.U Medical Center 424 East 34 Street. Hospitals are ready to see patients if of an urgent need, otherwise, students are requested to seek advice and counsel from their personal care physician first.

Safe Transportation: Our School does not have a residential campus. Students are responsible for their safe transport to and from School utilizing any public transportation of their choice, but being in full compliance with riding requirements as set by the State and City officials—namely the use of face coverings/PPE in public.

b. PPE

Distribution of face coverings to all staff and student populations: The School will provide, at its own cost, face coverings to all students. One plastic, reusable & cleanable, face shield will be distributed to each person on their first day of attendance. Disposable face coverings (surgical masks) and gloves will be available at all times. Students are allowed to wear their own face coverings, should they choose to do so, as long as the mouth and nose area are completely covered and it is worn properly and laundered often. Students will be required to use fresh gloves when performing treatments on each other. On the first day of class, students will receive instruction from their classroom teacher on the proper and required way to wear PPE in the School environment at all times. Any students who ignore face covering requirements will be dismissed from the premises.

On-site requirements: Face coverings will be required at all times by students and staff in the School campus. Any time a person will touch another (i.e.: during a facial or manicure), both mask and shield will be required by the practitioner. All facial services, student to student, will require the use of gloves by the practitioner. All instructors will be required to use gloves if they need to use their hands to instruct a student's technique. Face coverings will be required to enter the 1501 Broadway building, prior to entry to the School campus on the 7th floor; they are also required while riding the elevators. Elevator capacity has been decreased to riding alone or with no more than 4 persons at one time. Upon entrance to the School campus, students will be requested to hand sanitize with stations at the front door, prior to entry, after touching the elevator buttons. Hand sanitizer of 70% alcohol content, manufactured by Christine Valmy Inc., is in heavy supply throughout the School and all classrooms.

Training: All staff will be properly trained on the use, maintenance & safe disposal of PPE items. On the first day of each cohort return to the School building, a brief orientation about the COVID-19 regulation in the School environment will be reviewed in addition to the proper use of PPE and disinfection of classroom areas each student will be coming into contact with. Also, the cooperation of everyone "doing their part" to ensure a safe environment for all will be stressed.

c. Testing

As mentioned in item (a) above, the School & its testing provider will be administering Abbott Labs ID NOW COVID-19 testing for the active COVID-19 virus for ALL students and staff prior to initial admittance to the building. The tests develop in approximately 10 minutes; there will be no cost to the student or staff member. These tests will be conducted approximately every two weeks, as new cohorts of students return to the building. Any person with a positive result will not be allowed admittance to the School and be referred to their personal physician for further instructions. Those testing negative will be allowed to enter the building. Aside from testing, daily monitoring/screening will be conducted upon arrival to the School by temperature scan & initial screening questionnaire. If anyone registered 100°F or higher, they will not be allowed onto the campus and referred to their personal physician for monitoring. If registering a temperature below 100, they will be allowed into the School. In all cases, if a student is turned away from the School due to a positive test result or higher-than-average temperature, a doctor's note of clearance will be required to return to the School environment. The student may continue with distance education or take a leave of absence, depending on the severity of illness, after discussing options with the Student Services Advisor.

d. Residential Living

Christine Valmy International School is a day program/vocational school; we do not offer on-campus housing or residential options for students.

e. Operational Activity

Classes will operate on a modified format of traditional in-person and remote classes in the near term. All Esthetics students will continue theory and a portion of practical theory online, and will come to the School for the hands-on practice on each other. For the Nail Specialty courses, all students will continue partly online with some in person practice work. The teacher will continue to see and evaluate each of their work and progress. Students are required to show photos and videos of their work during class time. This way, the teachers can correct the students. Students will come into the School for the final practical preparation exam and state board preparation, when possible. Those Esthetics and Nails students with fewest hours remaining will be the first to return to the building for hands-on practice and completion of their course. Students will return to the building under their existing schedule of course hours (full-time or part-time – days, evenings, weekends, etc.). The general public will be prohibited from entering for services. Students will practice on mannequins or each other with the use of proper PPE. No theory classes (students in desk) will be given in the School building; only the practical component will be addressed until such time that we can go back to normal training that is fully on-site. The School will be reducing capacity to 50% of normal approved usage. At all times, everyone in the School will be required to wear a face covering. Marking/tape barriers designating 6' feet distances around bed/table areas in classrooms will be utilized as visual markers for physical boundaries to be observed.

f. Restart operations

To reopen the School building, owners and administrators have already begun the deep clean required. The School campus (and the greater floor 7) has been closed completely since March 16th, therefore most of the cleaning required was for dust and lack of use. In any event, teams of School-employed janitorial crews have already entered the building and scoured every corner of the School. All non-essential items were stored away. All surfaces have been cleaned with approved disinfectant cleaner, floor to ceiling. PPE was, and will continue to be, worn by all janitorial staff performing School sanitation. Since we do not own the building (the Paramount Building, Times Square), water quality for hand washing is building management-tested and maintained and was never shut off, however all water for human consumption is filtered & provided to all occupants of the School. Ventilation (HVAC system) has the air purifying filters of the highest quality available (pleated MERV 10) was never shut down, again, because we reside in a NYC high-rise; it will not need to be restarted. The School, however, has purchased portable UV light air purifiers and placed them strategically in the classrooms to purify the air as secondary precaution. The School also has windows that can be opened (for safety reasons) to provide additional building “fresh air” ventilation on the exterior walls.

g. Extracurriculars

Christine Valmy International School is a day program/vocational school; we do not offer extracurricular activities, like sports or clubs, however, we will not be offering any additional educational opportunities (like seminars or advanced education classes that often invite graduates and licensed appearance enhancement members from the general public) until the pandemic has been eradicated, or until high-alert status ceases.

h. Vulnerable Populations

Those students who would be part of the cohorts of students returning to the School building in the initial phases (i.e.: those students who have the fewest remaining hours to complete and requirements to perform in order to graduate) who are medically-compromised, are living with COVID-19 (either personally or in their home), reside with elderly family members or even have small children at home without alternate child care, due to still-limited availability of resources and school closures, would be considered vulnerable populations by the School. These students would be able to continue in the current temporary online format, as long as their studies allow, until they reach the maximum activity that can be performed online (ie: final practical/skills testing). At that point, a leave of absence would be discussed between Student Services and the student until such time the student feels comfortable returning to the in-school setting. The School is aware every student’s situation is different, and each has his/her own special needs during this pandemic; the School is very sensitive to accommodating each person in order to see they achieve successful graduation and completion of course requirements.

i. Hygiene, Cleaning & Disinfection

The School employs four full-time maintenance/janitorial personnel who have been trained in the use of disinfectants and cleaning products to be implemented in the School building, post-COVID-19. Janitorial staff wears complete PPE, including face covering, lab coats and gloves, and the use of disposable cleaning supplies (including paper towels) is required, wherever possible. Schedules of staff have been staggered to ensure maintenance will be conducted throughout all hours of the day – 8am – 10pm. All high-touch areas will be cleaned by maintenance staff every two hours (lobby, bathrooms, hallways, front desk) & classrooms every three hours. Trash receptacles are in every room and will be emptied hourly. In the interim for classroom purposes, students & instructors will continually clean and maintain sanitation on beds, machines, equipment, etc. Hand sanitizer is plentiful & sterilizers for equipment are located in each classroom. Alcohol disinfects mannequins. Sinks with running water and disinfectant hand soap are located in the bathrooms and in each classroom. All classroom laundry will be handled by School maintenance staff (bedding) and washed/dried in hot water, with bleach, in washer/dryers

Classrooms: Hand sanitizer dispensers will be located in each classroom and common area. Running water with ample quantities of soap and single-dispense paper towels are located at every sink. Alcohol-based solutions will be used to disinfect beds between uses. Linens will be stripped & beds remade between each student use. Mannequins and instruments will be sanitized between students. Face coverings will be required in each classroom, with diminished class sizes observed. 6' distance between beds with portable rolling carts/shields will be provided. Students will be requested to bring only ESSENTIAL items needed for their course work to the School, not large bags full of personal items.

Common areas: Students and staff will not be able to congregate in areas for social situations. All students will be required to remain in class & take their breaks or lunch outside the School building, whenever possible, to give them the opportunity to get fresh air. Common areas will be constantly cleaned as the walk-through areas (hallways, lobby); no seating will be utilized. Student break rooms will be closed temporarily and students are encouraged to remain in their classrooms. Restrooms will be cleaned regularly, including those outside our facility on the shared floor.

Signs are posted in conspicuous areas throughout the School reminding all campus inhabitants of best practices – 6' distancing, masks required, hand washing, etc. – in both English & Spanish language to encourage proper cleanliness at all times.

II. Monitoring

a. Testing Responsibility

Initial entry: As noted in item I(c), the School intends to test all students and staff on their first day of classes utilizing an outsider provider, with a procedure that is staggered approximately every two weeks

(as new cohorts of students re-enter the on-site environment). The Abbott Labs ID NOW COVID-19 instant test will give results in as little as 10 minutes, so there is no questioning the positive result of who is entering the School building. There is no cost to the student or staff member; the School is bearing the cost to maintain a safe educational environment. The test will be a requirement of admission back into the School; if a student or staff member refuses the test, they cannot attend and will need to join the other 'vulnerable populations' and remain in online education, for as long as is feasible, given their curriculum. If a student has had an active-virus COVID-19 test in the past three days, they can bring the official results of that test and have the on-site testing waived.

Daily screening: Also mentioned in item I(c) is the daily temperature check/screening that will be conducted as students/staff who have passed the initial COVID-19 test on day one and will continue to come back to the School each day. Anyone with a temperature registering 100°F or over will be denied entry to the School and referred to their physician for follow up. Student temperatures will not be recorded by law, however, student name/ID & "pass/fail" info will be retained and, if above the maximum allowed, the student will not be admitted into the School.

b. Testing Frequency & Protocols

All students & staff returning to the building will be COVID-19 tested on day one. As each new cohort returns to the School environment, a COVID-19 instant test will be required for entry. Testing will not be performed on each student multiple times, unless the student/staff member believes he/she was exposed to the virus or has travelled outside the states of NY/NJ/CT within the past week.

c. Early Warning Signs

In order to assure a safe school environment, the School will inform the Dept. of Health if more than 3 students/staff members from a cohort on any single-entry date test positive on the COVID-19 instant test. Since the amount of students/staff we intend to re-introduce will be far lower than usual, three positive results could indicate a greater trend the City will be interested in learning about.

d. Contact Tracing

The School intends to cooperate fully with the NY State Contact Tracing Program. Students will be informed prior to their return to the School building on the first day of school that: 1) the test will be occurring & delivered by an outside provider & 2) in the event of a positive COVID-19 test, the Contact Tracing hotline will be contacted and follow-up will be automatic. The student will need to be a good citizen and cooperate to his/her fullest in order to back-trace their steps to prevent future breakouts from occurring in our city.

e. Screening

All students & staff returning to the building each day will be temperature checked, prior to admittance. Classroom instructors will act as monitors of their students' health (if anyone is acting tired, or displaying any physical symptoms of ANY illness) and will report immediately to the School Director if less-than-normal individual behavior is being displayed. The student will be removed from class & re-scanned to check temperature in the designated quarantine room for specific protocol to commence.

Additionally, at the time of the COVID-19 test for initial entry on day one, the School will use a questionnaire to screen questions of specific importance including:

- 1) Knowledge of contact in the past 14 days of anyone with COVID-19 or similar symptoms;
- 2) If the person has HAD COVID-19 in the past 14 days;
- 3) If the person has experience COVID-19-like symptoms in the past 14 days.

Any answers in the affirmative would be denied admission until receiving a letter of clearance from their doctor.

III. Containment

a. Isolation & Quarantine

Christine Valmy International School does not provide on-campus residence to its students. We are a day school with additional evening and weekend hours; however, we close by 9:30 pm daily. Our school is not challenged with any residence-based isolation, medical care requirements or long-term quarantine issues; students reside in their homes. Any isolation will be considered temporary until the student is removed and the area of quarantine is disinfected.

The School has designated one classroom as a quarantine unit, should the need arise. All classroom items have been removed. Should a student be struck with symptoms of ANY illness during their school day, they will be requested to enter the quarantine room and await further instructions. Any staff entering the room will be required to don complete PPE – mask, visor, gloves & disposable gown. The local Dept. of Health will be contacted for further instructions &, once safe transport to the student's home/doctor has been arranged by their family, the student will be released from the School via the back-exit stairwell to the street level. If the student is gravely ill, having problems breathing or unconscious, 9-1-1 will be called immediately.

b. Hygiene, Cleaning & Disinfection

In the event of an isolation or quarantine situation, the School will remove the ill student to the isolation room. The classroom the student was previously located in before removal will be evacuated and immediately cleaned, top to bottom, using bleach-based solutions. Students & teachers will be relocated for the remainder of their school day and notified that an isolation incident has occurred and they have the option of continuing in the relocated classroom for the day or signing out and going home; at all times, students are encouraged to consult their personal physician for specific guidance and if immediate

testing would be recommended in their situation. With the required use of PPE in the School building, we are hopeful transmissions on premises will not occur.

Since students enter from the same area and report directly to their classrooms, there should be few common areas that will require complete disinfection. All bathrooms will be immediately cleaned, as well as the front entrance area.

Additionally, once the student is removed from the quarantine room, it will be cordoned off not to be touched for 24 hours BY ANYONE. After 24 hours, PPE-protected cleaning staff will use bleach-based disinfectants to clean the room, top to bottom. Another 24 hours will be required to pass before anyone can reenter the sanitized room for an additional quarantine situation, should it be needed.

c. Communication

This plan, prior to reopen, will be posted on our website as a PDF for those students who wish to read it in its entirety. Students will be informed, via email, where to find the information on our COVID-19 resource area; staff members will be sent an email with complete details, once approved by the State of NY Education Dept.

IV. Shutdown

a. Operational Activity

In the event that more than three students or staff members have entered the building and received a positive COVID-19 test after previously testing negative on day one, or through contact tracing, it can be demonstrated more the one student working beside another has contracted the virus while in the School building, the School will immediately cease operations for 2 days to perform a complete professional cleaning of the School. All students and staff will have to retake the COVID-19 test to return or wait 14 days.

b. Move-out

All students that attend Christine Valmy International School reside in their own homes; we do not operate housing for students.

c. Communication

In the event of a modification to the slow, deliberate roll-out plan we have organized, and the possibility of scaled-back operations or second physical location closure due to a COVID-19 outbreak at the School or NYC proper, all communications with students will be emailed directly to them and notices placed on our COVID-19 information page of the School website: <https://www.christinevalmy.com/coronavirus/>
These communications will include:

- Instructions
- Information about testing & daily screenings
- PPE requirements
- Signage at the School

- Entrance/egress requirements
- And where to go (web) for complete and continually updated information