



Appendix C-Approved OSHE Waiver Nursing, Pre-Nursing Sciences, Medical Assisting, Dental Assisting/Dental Radiology, and Phlebotomy programs.

Warren County Community College

May 13, 2020

Zakiya Smith Ellis, Secretary of Higher Education
Office of the Secretary of Higher Education
1 John Fitch Plaza, 10th Floor
P.O. Box 542
Trenton, NJ 08625-0542

Dear Madam Secretary:

Warren County Community College is requesting a waiver from the prohibition in Executive Order No. 104 that bars in-person instruction at institutions of higher education.

On behalf of Warren Community College, I am appealing to you for an exception to the gubernatorial ban on face-to-face instruction for our nursing and other health science education and training programs. Warren County Community College requests a waiver to allow the College to conduct in person instruction for ***Nurse Education, Pre-Nursing Sciences, Medical Assisting, Dental Assisting/Radiology, and Phlebotomy programs*** offered at its Washington and Phillipsburg Campus locations. Training in some of these programs was suspended due to the COVID 19 pandemic. Additionally, the College requests waivers to resume clinical instruction at our mentoring clinical sites upon approval from those healthcare institutions.

During these first few months of campus closure we have provided continuous, weekly remote classes via Go-To-Meeting that have kept our classes on schedule for the lecture portion of the curriculum. However, students must complete the competency-based, hands on training that is critical in developing their clinical skills in order to be deemed proficient and prepared for their role as essential members of the allied healthcare delivery team. Competency training and evaluation is also required by our accrediting and approval agencies, including the Accreditation Commission for Education in Nursing (ACEN), the New Jersey Board of Nursing (BON), the Commission on Accreditation of Allied Health Education Programs (CAAHEP), the Medical Assisting Education Review Board (MAERB), the New Jersey Department of Environmental Protection's Bureau of Radiologic Health (DEP/BRH), the Dental Assisting National Board (DANB) and the National Healthcareer Association (NHA). In person competency training required by accrediting agencies as a condition of licensure and certification has not been waived by these respective agencies.



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We expect that our graduates will be highly employable as essential healthcare workers, serving the local healthcare industry. We've recently graduated our 2019-2020 senior nursing cohort 10 days early, so they can be of service to our healthcare community at large, affording them an opportunity to gain emergency licensure, as recently permitted by the State of New Jersey. We feel that our nursing and other healthcare program graduates are in high demand and valued by the healthcare community during these unprecedented times.

Warren County Community College remains committed to providing our healthcare community with qualified graduates in a most expeditious manner, with the utmost of care in exercising proper social distancing and self-protection measures.



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This waiver application is for **Nursing, Pre-Nursing Sciences, Medical Assisting, Dental Assisting/Dental Radiology, and Phlebotomy programs.**

Describe training or guidance Warren County Community College will provide to students regarding appropriate precautions for self-protection as healthcare professionals.

NURSING

What type of training is provided for students in this program regarding precautions and self-protection?

Students in this program base much of their training on the proper use of PPE, proper handwashing, and other standard precautions that healthcare professionals use in the medical field while caring for patients. This includes, but is not limited to, knowledge of common communicable diseases, the chain of infection and transmission of disease, types of precautions, standard precautions, donning and doffing PPE, and typical signs and symptoms of communicable disease.

Students are informed of the SARS-CoV-19 virus and the COVID 19 disease transmission process through their didactic instruction and this information will be reinforced while performing classroom laboratory and clinical skills. Additionally, each mentoring hospital and healthcare institution will provide the same training and reinforcement as they would provide for their employees.

What do the professional/accrediting organizations/agencies say about training for healthcare professionals?

ACEN Standard Criterion 4.9 stipulates: *Student clinical experiences and practice learning environments are evidence-based; reflect contemporary practice and nationally established patient health and safety goals; and support the achievement of end-of-program student learning outcomes.* These end-of-student learning outcomes include gaining proficiency through clinical skills demonstration, practice, and skills test-offs. In accordance with the NJ Board of Nursing regulations, the nurse education program maintains contracts with numerous



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healthcare facilities to ensure clinical experiences that reflect current best practices and nationally established patient health and safety goals.

Any special training from the clinical site?

Each mentoring hospital setting will provide the same training and reinforcement as they would provide for their employees, following CDC and NJ Department of Health Guidelines as part of their onboarding orientation.

CDC guidance

All accessing the facility will follow guidance from the CDC, <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>. These guidelines, as well as the “Stop the Spread of Germs” poster, at <https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html>, are posted throughout the college property.

PRE-NURSING SCIENCES

What type of training is provided for students in this program regarding precautions and self-protection?

Students in the pre-nursing sciences are trained on the proper use of PPE, proper handwashing, and other standard precautions that healthcare professionals use in the medical field while caring for patients. This includes, but is not limited to, knowledge of common communicable diseases, the chain of infection and transmission of disease, types of precautions, standard precautions, donning and doffing PPE, and typical signs and symptoms of communicable disease.

Students are informed of the SARS-CoV-19 virus and the COVID 19 disease transmission process through their didactic instruction and this information will be reinforced while performing classroom laboratory and clinical skills.

What do the professional/accrediting organizations/agencies say about training for healthcare professionals?



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Pre-nursing sciences are a required component of the nurse education program. While didactic instruction can certainly be facilitated through remote/online delivery, the hands-on-learning experienced through the in-person sessions is an essential component of the learning experience.

ACEN Standard Criterion 4.4 stipulates: The curriculum includes general education course that enhance professional nursing knowledge and practice. Each of the pre-nursing sciences affords students an opportunity to practice laboratory skills that enhance professional nursing skills and practice.

Any special training from the clinical site?

N/A

CDC guidance

All accessing the facility will follow guidance from the CDC, <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>. These guidelines, as well as the "Stop the Spread of Germs" poster, at <https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html>, are posted throughout the college property.

MEDICAL ASSISTING

What type of training is provided for students in this program regarding precautions and self-protection?

Students in this program base much of their training on the proper use of PPE, proper handwashing, and other standard precautions that healthcare professionals use in the medical field while caring for patients. This includes, but is not limited to, knowledge of common communicable diseases, the chain of infection and transmission of disease, types of precautions, standard precautions, donning and doffing PPE, and typical signs and symptoms of communicable disease.

Students are informed of the SARS-CoV-19 virus and the COVID 19 disease transmission process through their didactic instruction and this information will be reinforced while performing classroom laboratory and clinical skills. Additionally, each mentoring outpatient ambulatory



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care setting will provide the same training and reinforcement as they would provide for their employees.

What do the professional/accrediting organizations/agencies say about training for healthcare professionals?

CAAHEP and MAERB require that students achieve all the psychomotor and affective competencies in the MAERB Core Curriculum through practice and competency testing prior to entering the externship rotation and for program completion. Supervision is still a necessary component of that achievement. **Standard III.C.3** requires participating in at least 160 contact hours in an ambulatory healthcare setting, demonstrating the knowledge, skills, and behaviors of the MAERB Core Curriculum in performing clinical and administrative duties.

Any special training from the clinical site?

Each mentoring outpatient ambulatory care setting will provide the same training and reinforcement as they would provide for their employees, following CDC and NJ Department of Health Guidelines as part of their onboarding orientation.

CDC guidance

All accessing the facility will follow guidance from the CDC, <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>. These guidelines, as well as the "Stop the Spread of Germs" poster, at <https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html>, are posted throughout the college property.

DENTAL ASSISTING/DENTAL RADIOLOGY

What type of training is provided for students in this program regarding precautions and self-protection?

Students in this program base much of their training on the proper use of PPE, proper handwashing, and other standard precautions that healthcare professionals use in the medical field while caring for patients. This includes, but is not limited to, knowledge of common communicable diseases, the chain of infection and transmission of disease, types of precautions, standard precautions, donning and doffing PPE, and typical signs and symptoms of communicable disease.



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Students are informed of the SARS-CoV-19 virus and the COVID 19 disease transmission process through their didactic instruction and this information will be reinforced while performing classroom laboratory and clinical skills. Additionally, each mentoring dental office will provide the same training and reinforcement as they would provide for their employees.

What do the professional/accrediting organizations/agencies say about training for healthcare professionals?

DANB's National Entry Level Dental Assist certification training program is competency-based, preparing students to perform 4-handed dentistry, practicing infection control, and demonstrating proficiency in dental radiologic procedures. Similarly, the NJ DEP/BRH's required components of dental radiologic laboratory instruction states that:

A school must develop and implement a laboratory curriculum that includes: (1) Instructor's demonstration of the activity/procedure to students, (2) Adequate time for students to practice the activity/procedure, while under the direct supervision of the instructor and (3) Evaluation of student proficiency of the activity/procedure by the instructor and recorded on forms approved by the Board.

Any special training from the clinical site?

Each mentoring dental office clinical setting will provide the same training and reinforcement as they would provide for their employees, following CDC and NJ Department of Health Guidelines as part of their onboarding orientation.

CDC guidance

All accessing the facility will follow guidance from the CDC, <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>. These guidelines, as well as the "Stop the Spread of Germs" poster, at <https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html>, are posted throughout the college property.

Describe steps Warren County Community College will take to adhere to NJ Department of Health guidance for healthcare professionals.

All programs will follow guidance provided by the NJ Department of Health Communicable Disease Service including all alerts and advisories.

The general Warren County Community College Infection Control Plan is as follows:

It is the goal of Warren Community College to provide a safe and healthy space for our students, faculty, and staff. We will be adding additional measures to our nursing and health



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science education training program policies and procedures in order to minimize the risk of transmission of any illness. Additional measures include:

A designated staff member will monitor and enforce this plan for each program

- Nursing: Pat Stypolkowski- the Director of Nurse Education
- Pre-Nursing Sciences: Dr. Anthony Perone-Area Chair
- Medical Assisting: Dr. Marianne Van Deursen, VP of Academics and Certified Medical Assistant –CMA (AAMA)
- Dental Assisting/Dental Radiology: Dr. Gerliz Garcia-Dental Assisting Instructor/Dentist
- Phlebotomy Program: Dianne Czar, RN- Program Coordinator Non-Credit Allied Health Programs

We will limit the number of individuals permitted in the training area at any given time. Staff will arrange students in the workspaces to minimize close contact. No activities will take place without these social distancing measures in place.

Additional Information requested 5/21/2020

What is WCCC's plan to ensure social distancing for students waiting to participate in the skills test?

- Students will be staged in a seating area approximately 20 feet from the immediate skills testing area, while maintaining a 6 foot distance from one another in that area.
- Students will be required to wear face masks in both staging and skills testing areas

What accommodations will WCCC offer to high-risk individuals?

- High risk individuals will be scheduled individually at a separate time when other cohort students are not in the building, with only one instructor assessing student competency.
- The instructor will be required to be symptom and temperature free, as assessed by the person designated to oversee that area.

WCCC will follow guidance by the CDC regarding high risk individuals

<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html>



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What is WCCC's plan to educate and restrict students on the sharing of equipment and personal items (i.e. safety glasses)?

- Students will be required to disinfect any equipment they use prior to and after use, following the same precautions previously taught for the healthcare environment, using industry standard disinfectant and alcohol wipes.
- The sharing of personal items will be restricted as there is an adequate supply so that students do not have to share personal items such as stethoscopes, safety glasses, PPE, and other items during lab sessions.
- Students will *not* share syringes, vacutainers, needles, laboratory testing strips, EKG testing pads, and laboratory testing vials, and all other single-use supplies, as they are all disposable.

Students and faculty will be instructed to follow proper respiratory hygiene, including:

- Covering coughs and sneezes with a tissue or your sleeve, not your hands
- Avoid touching your eyes, nose, and mouth
- Students will be required to wash their hands frequently. Handwashing will be required upon entry to the facility and at the conclusion of working before exiting the facility. Directions for proper handwashing are displayed at all sinks, clearly following the general rule of washing for at least 20 seconds, especially after coughing or sneezing. They will use alcohol-based sanitizer if soap and water are not available.
- All handwashing stations will be clean and functional, with soap, paper towels, tissues, and trash cans.
- Additional hand sanitizing stations that dispense alcohol based hand sanitizer, are installed at the main entrance of the facility and throughout the college.
- The instructors will constantly clean and disinfect high touch surfaces including all tables, medical devices, and training equipment.
- Disinfectant and alcohol wipes are located at all working areas. All tools and equipment will be wiped both prior to and immediately after use.
- Temperature checks will be taken of all students and faculty prior to and during instructional sessions.
- Anyone who is not feeling well will be sent home. Anyone who believes they are not fully well will be sent home. If anyone enters the facility and displays symptoms of illness, they will be requested (demanded) to leave. If they need to stay at the facility to wait for a ride they will be required to sit outside until their transportation arrives. That room will be sanitized immediately after the student departs.
- If someone displays symptoms and are asked to leave, all students working in that area will be asked to leave that workspace. Campus Operations and Public Safety will be



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notified, and areas will be cleaned immediately.

Additionally faculty, staff, and students will be required to adhere to the following policies. These policies will be provided to all students, faculty, and staff; and faculty will cover these policies with their students. Additionally, these policies will also be on display throughout the center and on our website. The instructional classrooms/labs will be monitored at all times by the VP of Academics and the designated persons above to ensure policies are being adhered to.

- No open water glasses will be permitted.
- No food permitted.
- All anatomical models and equipment must be wiped with an alcohol or disinfectant wipe both prior to and after use. This includes tabletops.
- Wear protective face mask and gloves at all times
- If you are not feeling well please stay home and get better. Our goal is to minimize any transmission of illness. Your help is greatly appreciated.

All accessing the facility will follow guidance from the CDC, <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>. These guidelines, as well as the "Stop the Spread of Germs" poster, at <https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html>, are posted throughout the college property.

Additional protocols special for each program

Nursing

Students in the Nursing program acquire extensive training in infection control protocol and the use of personalized protective equipment (PPE) as part of their regular curriculum. Nursing students are taught to follow CDC guidance at all times and abide by best practices as adopted by professional and regulatory agencies (ACEN and the NJBON) in clinical practice.

The nursing classroom and skills lab can accommodate up to 6 students at one time while maintaining social distancing requirements. For nursing skills test-offs and practice, a group of 20 students will rotate through scenarios, 1 to 2 students at a time, while maintaining social distancing requirements and with 1-2 instructors supervising and evaluating.

Pre-Nursing Sciences



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Students in the Pre-Nursing science courses will receive extensive training in infection control protocol and the use of personalized protective equipment (PPE) as part of their regular curriculum. Pre-Nursing science students are taught to follow CDC guidance at all times and abide by best practices as adopted by regulatory agencies (CDC and NJ Dept. Health).

The science labs can accommodate up to 24 students, however, enrollment in labs will be limited to only 7- 10 students per lab station and a total of only 15-20 students in each lab, in order to maintain adequate social distancing.

Medical Assisting

Students in the Medical Assisting program acquire extensive training in infection control protocol and the use of personalized protective equipment (PPE) as part of their regular curriculum. Medical Assisting students are taught to follow CDC guidance at all times and abide by best practices as adopted by professional and regulatory agencies (CAAHEP and MAERB) in clinical practice.

The skills lab can accommodate up to 6 students at one time while maintaining social distancing requirements. For clinical competency skills test-offs and practice, a group of up to 20 students will rotate through scenarios, 2-4 students at a time, while maintaining social distancing requirements and with 1- 2 instructors supervising and evaluating.

Dental Assisting/Dental Radiology

Students in the Dental programs acquire extensive training in infection control protocol and the use of personalized protective equipment (PPE) as part of their regular curriculum. Nursing students are taught to follow CDC guidance at all times and abide by best practices as adopted by professional and regulatory agencies (DANB and NJ DEP/BRH) in clinical practice.

The skills lab can accommodate up to 6 students at one time while maintaining social distancing requirements. A group of 12 total students can be accommodated per class, per day with 2-4 students rotating through skills practice and testing at one time, on a rotating basis, with 1 instructor supervising and evaluating.

Phlebotomy

Students in the Phlebotomy program acquire extensive training in infection control protocol and the use of personalized protective equipment (PPE) as part of their regular curriculum.



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Nursing students are taught to follow CDC guidance at all times and abide by best practices as adopted by professional and regulatory agencies (NHA) in clinical practice.

The skills lab can accommodate up to 6 students at one time while maintaining social distancing requirements. A group of 12 total students can be accommodated per class, per day with 2-4 students rotating through skills practice and testing at one time, on a rotating basis, with 1 instructor supervising and evaluating.

Describe the compelling rationale for continuing in-person instruction and potentially exposing individuals at the institution to COVID-19.

The nursing and all other health education programs at Warren County Community College listed in this waiver application have requirements that students must complete prior to entering the clinical phases of their training. Students must pass skill competencies that are taught and practiced during in-person skills sessions and assessed during in-person competency skills check off sessions.

There is a high demand for personnel in these specific jobs, as evidenced through the NJ Jobs Portal <https://jobs.covid19.nj.gov/>, which identifies over 400 current job openings in the allied health field of employment. Warren County Community College can provide the training programs to help address the shortage of personnel needed to fill these essential jobs in the healthcare industry, particularly contributing to the efforts to combating the COVID 19 Pandemic.

Students who are currently unemployed or underemployed can be sponsored through the NJ Department of Labor training grants for shorter-term workforce development training programs, such as Medical Assisting, Dental Assisting/Radiology, and Phlebotomy. These training grants are meant to specifically help retrain dislocated workers into the fields where the jobs currently exist. Our nursing and other health science programs are all considered in-demand occupations.

Describe why the instruction cannot be provided through either online instruction or distance education.

As mentioned above, these are very “hands-on” programs. We are rapidly exhausting the remote delivery of instructional materials. Initially, students observe demonstration of techniques, followed by an initial written assessment of the practices and procedures required to perform all clinical competencies. While students are coached through the demonstrations, competency-based, hands-on-training is essential to developing these



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competency skills; therefore, access to the training labs is essential to assess proficiency in all skill development.

Students do not have the appropriate assessment tools and equipment to perform skills in which they must be proficient prior to entering the clinical setting. Instructors are unable to assess each student's proficiency in performing competency skills using the online delivery of instruction. In-person interactions are still required in order to assess students' competency prior to being allowed into the clinical settings.

Additionally, it would be unsafe for students to utilize supplies and equipment and to perform tasks that involve needles, syringes, and other laboratory testing supplies without guidance and supervision. Students must be assessed on the ability to perform many clinical skills, including: patient assessment, obtaining vital signs, performing laboratory testing (such as blood testing and typing, urinalysis and microscopic urinalysis, etc), administering immunizations, performing venipuncture and phlebotomy, performing pulmonary function and EKG testing, and using anatomical models insert catheters, insert/start IVs, , etc.

Describe other options your institution has explored as an alternative to in-person instruction, including alternate forms of instruction or the postponement of academic programming, and provide an explanation for why these options were not adopted.

While our instructors have been remotely sharing their expertise and creatively delivering remote class instruction, you can only develop so far without actually performing certain skills described above, such as administering immunizations, participating in simulation exercises, obtaining vital signs, and practicing patient care skills.

For the past two months, students have completed the didactic portion of their instruction remotely, using a variety of online delivery formats. While didactic instruction can certainly be delivered online in a hybrid fashion, postponing clinical skills practice and assessment, now and in future semesters, will result in the unfortunate circumstance that WCCC will not be able to meet the needs of the healthcare community. Students must be prepared to perform these skills proficiently in order to become properly credentialed and employable during this time when their contribution to the healthcare system is considered an essential service.



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Set forth the precautions you will take to minimize the risk of COVID-19 exposure and spread to the student or students that your institution proposes to continue to serve through in-person instruction.

As mentioned above, it is the goal of Warren Community College to provide a safe and healthy space for our students, faculty, and staff. We will be adding additional measures to our nursing and health science education training program policies and procedures in order to minimize the risk of transmission of any illness. Additional measures include limiting the number of individuals permitted in the training area at any given time. Staff will arrange students in the workplaces to minimize close contact. No activities will take place without these social distancing measures in place.

Students and faculty will be instructed to follow proper respiratory hygiene, including:

- Covering coughs and sneezes with a tissue or your sleeve, not your hands
- Avoid touching your eyes, nose, and mouth
- Students will be required to wash their hands frequently. Handwashing will be required upon entry to the facility and at the conclusion of working before exiting the facility. Directions for proper handwashing are displayed at all sinks, clearly following the general rule of washing for at least 20 seconds, especially after coughing or sneezing. They will use alcohol-based sanitizer if soap and water are not available.
- All handwashing stations will be clean and functional, with soap, paper towels, tissues, and trash cans.
- Additional hand sanitizing stations that dispense alcohol based hand sanitizer, are installed at the main entrance of the facility and throughout the college.
- The instructors will constantly clean and disinfect high touch surfaces including all tables, medical devices, and training equipment.
- Disinfectant and alcohol wipes are located at all working areas. All tools and equipment will be wiped both prior to and immediately after use.
- Temperature checks will be taken of all students and faculty prior to and during instructional sessions.
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- If someone displays symptoms and are asked to leave, all students working in that area will be asked to leave that workspace. Campus Operations and Public Safety will be notified, and areas will be cleaned immediately.

Additionally faculty, staff, and students will be required to adhere to the following policies, which will be on display throughout the center and on our website. The instructional classrooms/labs will be monitored at all times by the VP of Academics and the designated persons mentioned below to ensure policies are being adhered to.

- No open water glasses will be permitted.
- No food permitted.
- All anatomical models and equipment must be wiped with an alcohol or disinfectant wipe both prior to and after use. This includes tabletops.
- Wear protective face mask and gloves at all times
- If you are not feeling well please stay home and get better. Our goal is to minimize any transmission of illness. Your help is greatly appreciated.

Designated oversight of program courses:

- Nursing: Pat Stypolkowski- the Director of Nurse Education
- Pre-Nursing Sciences: Dr. Anthony Perone-Area Chair
- Medical Assisting: Dr. Marianne Van Deursen, VP of Academics and Certified Medical Assistant –CMA (AAMA)
- Dental Assisting/ Radiology: Dr. Gerliz Garcia-Dental Assisting Instructor/Dentist
- Phlebotomy Program: Dianne Czar, RN- Program Coordinator Non-Credit Allied
- Health Programs

All accessing the facility will follow guidance from the CDC, <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>. These guidelines, as well as the “Stop the Spread of Germs” poster, at <https://www.cdc.gov/coronavirus/2019-ncov/communication/factsheets.html>, are posted throughout the college property