COVID-19 Assessment
October 09, 2020

EBI Project #: 6820000150

Prepared for:
National Board of Examiners in Optometry
200 S. College Street, Suite 2020
Charlotte, NC 28202
October 9, 2020

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Subject: COVID-19 Assessment  
National Board of Examiners in Optometry  
200 South College Street, Charlotte, NC  
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Dear Mr. Pierce,

Attached please find EBI's report following the COVID-19 Assessment that was performed at the National Center of Clinical Testing in Optometry located in the BB&T Office Building, 200 South College Street in Charlotte, North Carolina.

Thank you for the opportunity to prepare this Report and assist you with this project. Please call us if you have any questions or if EBI Consulting may be of further assistance.

Respectfully Submitted by;

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# Table of Contents

OVERVIEW – COVID-19 ........................................................................................................................................... 2  

1.0 PRIOR TO EMPLOYEES RETURNING TO WORK ................................................................................. 3  

2.0 BB&T OFFICE BUILDING GENERAL SPACES .................................................................................. 4  

3.0 PRIOR TO CANDIDATES ARRIVING FOR TESTING ..................................................................... 4  

4.0 CANDIDATES ARRIVING FOR TESTING ...................................................................................... 4  

5.0 NCCTO .................................................................................................................................................. 5  

6.0 ENHANCED CLEANING PRACTICES ............................................................................................ 5  

7.0 EMPLOYEE PARTICIPATION ........................................................................................................... 6  

8.0 CONCLUSIONS .................................................................................................................................... 6  

9.0 LIMITATIONS AND DISCLOSURE ................................................................................................. 6
OVERVIEW – COVID-19

The National Board of Examiners in Optometry (NBEO) is an independent, non-governmental, non-profit organization that administers examinations for optometric licensure in the United States and is accepted internationally. Their testing facility, called the National Center of Clinical Testing in Optometry (NCCTO), is on the 20th floor of the 22-Story BB&T Office Building located on 200 South College Street in Charlotte, North Carolina. NBEO has 16 full-time staff members and a number of part-time standardized patients used to conduct examinations. The NCCTO typically receives over 2,500 candidates from all over the United States and Canada annually.

COVID-19
Charlotte, North Carolina was a region hit by the Corona Virus (COVID-19) pandemic. The government implemented a shutdown of “non-essential” businesses on approximately March 30, 2020. Prior to this government order, NBEO closed the NCCTO and paused all testing on March 16, 2020. Also, on March 16, 2020, all full-time NBEO staff were instructed and equipped to work remotely. In early May, NBEO staff deemed critical to the operations of the NCCTO were allowed to return to work on-site. Among other things, these critical staff members implemented multiple safety protocols and conducted training in preparation for resuming testing in the NCCTO.

As the number of new COVID-19 incidents decreases, state officials have set up a gradual process to restart the state’s economy and ease COVID-related restrictions. The phase-in plan prioritizes businesses considered to have a greater economic impact and inherently low risks of infection for the workers and customers, followed by other businesses considered to have less economic impact, and those that present a higher risk of infection spread. Due to the importance of NBEO’s ability to examine candidates for licensure and subsequent entry into the optometry profession, the NCCTO re-opened on May 18, 2020. Reopening occurred with multiple safety measures to keep candidates, standardized patients, and staff healthy. The NCCTO currently facilitates testing of between 25-45 candidates per day, staggered through three separate sessions. Each session accommodates 8-14 candidates. The candidates rotate between a series of testing rooms to complete their practical examination with the standardized patients. A standardized patient is a part-time NBEO employee carefully recruited and trained to take on the characteristics of a real patient, thereby affording the candidate an opportunity to be evaluated on learned skills in a simulated clinical environment.

This document assesses the current controls in place by the BB&T Center and NBEO and offers practical best practices to continue operating safely, including: physical distancing, ventilation and utilities, enhanced cleaning procedures, employee wellness and training, communication to candidates and staff.
1.0 PRIOR TO EMPLOYEES RETURNING TO WORK

- All full-time NBEO employees worked remotely until early May 2020. NBEO provided the equipment (laptops, scanner, printers, etc.) necessary for staff to work from home.
- Beginning in early May, NBEO employees critical to the operation of the NCCTO returned to work on-site. All other staff members continue to be required to work remotely.
- Before returning to work, NBEO provided pre-opening virtual orientation and written documentation to employees to ensure they understand and feel confident in managing the physical distancing and hygiene aspects of their role, including reminding visitors of the NCCTO’s safety requirements. Upon returning to work on-site, NBEO staff and standardized patients reviewed all safety protocols and signed a document acknowledging and agreeing to abide by these protocols.
- NBEO provided:
  - Clear direction on the new policy changes in response to COVID-19
  - Location of disinfectants for employee use, mask, gowns and gloves
  - Education on the common symptoms of COVID-19
  - Guidance to stay away from the workplace
  - What actions to take if they become unwell
  - New protocols when interacting with candidates
- NBEO designated a Wellness Screener and required a daily wellness check upon arrival for all individuals (i.e., employees, candidates, and visitors) entering the NCCTO. Anyone who reports having a fever of 100.4° F or above or is otherwise sick is denied entry into the NCCTO. They are required to stay home until cleared for physical return to the NCCTO by their medical provider and can provide evidence of a negative COVID test. Anyone who develops any symptoms of COVID-19 while onsite is asked to leave and must provide documentation from their medical provider before they may return to the NCCTO.
- Employees have access to disinfectants, and other needed supplies, including necessary personal protective equipment (PPE) such as disposable non-latex gloves, and face masks. Other PPE (e.g., gowns, goggles, face shields, N95/KN95 respirators) is available as needed. Employees have the option of bringing their own facemask as well. Additionally, necessary employees were trained on how to don and doff N95/KN95 respirators.
- Signs were clearly posted throughout the suite reminding employees and visitors of the need to social distance and to wear face coverings.
- Markers were placed on the floor, six feet apart, designating where people must stand in various areas of the NCCTO and during various phases of the testing process.
- No more than 4 visitors are allowed in the elevator lobby at one time.
- NBEO had hand sanitizer stations available throughout the NCCTO. Touch free hand sanitizer dispenser stations and hand sanitizer containers were placed in convenient locations, such as at entrances, exits, near elevators, and restrooms.
- All staff, board, and exam committee and council meetings are currently conducted virtually.
- The testing rooms and the offices of the critical NCCTO staff are the only areas being used in the NCCTO.
- Employees are required to socially distance whenever possible. Employees are encouraged to call colleagues as opposed to visiting their offices. Employees are required to eat lunch in private rooms or in rooms large enough for social distancing.
- Water fountains are equipped with paper cups and the refrigerator is continually stocked with water bottles.
- NBEO provided pre-opening orientation to all standardized patients (SPs) to ensure they understand and feel confident in managing the physical distancing and hygiene aspects of their role. SPs were informed of the following:
  - All SPs are always required to wear mask while in the suite.
• A wellness check is required upon arrival, including temperature checks and a COVID-19 questionnaire. Temperature checks are required every three hours and logged in the “Wellness Screening Log for Employees, Contractors, and Guests Document”.
• SPs are required to leave if they feel sick at any time. If they are sick, they are required to provide proper medical documentation before they may return to the NCCTO.
• SPs must social distance, unless they are required to interact with the candidates. Masks are always required for all SPs and candidates.
• SP break area seats are limited and spaced over six feet to promote social distancing.

2.0 BB&T OFFICE BUILDING GENERAL SPACES

• Signs were clearly posted throughout the corridors and elevators notifying visitors of the need to social distance and to wear face coverings.
• Retail stores and restaurants in the building are closed or their hours are reduced. Thus, the building has approximately 80% less foot traffic than prior to the pandemic.
• Building management established a daily wellness check upon arrival for all maintenance staff, security personnel, vendors and custodians.
• All building tenants are notified if a positive test was reported in the building and of the location in the building where the individual with the positive test spent time.
• The building elevators had signs limiting the number of riders permitted on the elevator at one time. Elevator lobbies had markers on the floor, six feet apart, designating where people must stand while waiting for the elevator.

3.0 PRIOR TO CANDIDATES ARRIVING FOR TESTING

• NBEO regularly posts updated information on its webpage (https://www.optometry.org/index.cfm) under the COVID-19 Health and Safety Updates link.
• Students have a choice within their last year of optometry school of when to take the exam. NBEO has relaxed its rescheduling protocols so that any candidate may reschedule his/her selected examination date with no penalty. Thus, if a candidate has a fever at or above 100.4° F or is otherwise sick and is therefore prohibited from entering the NCCTO, the candidate has the flexibility to reschedule the examination without penalty.
• Testing candidates have the option to bring their own mask or N95/KN95 respirators. Masks are available for all testing candidates if needed.
• Testing candidates are aware of the wellness check upon arrival, such as temperature checks and a COVID-19 questionnaire.
• All candidates are emailed two weeks prior to their scheduled testing date. They receive the following items:
  o NBEO’s Safety Protocol Communication detailing COVID-19 Policy Changes;
  o NBEO’s Face Covering Statement, Release, and Waiver of Claims; and
  o NBEO’s Candidate Release of Liability and Assumption of Risk.

4.0 CANDIDATES ARRIVING FOR TESTING

• Signs were clearly posted throughout the Elevator Lobby notifying visitors of the need to social distance by placing markers on the floor, six feet apart, and designating where people must stand while waiting to be checked in or waiting for the elevator.
• NBEO’s Wellness Screener greeted all visitors in the elevator lobby. Candidates are only permitted to arrive 10 minutes before their scheduled entrance time. If a candidate arrives early, they are asked to leave the facility and return 10 minutes before their scheduled entrance time. This is to prevent lingering in the elevator lobby.
• The Wellness Screener performs a wellness check on all visitors, employees and testing candidates by using a digital forehead thermometer. If someone’s temperature is equal to or over 100.4° Fahrenheit (F), another staff member rechecks the person with an oral thermometer. The visitor is turned away if their temperature still reads equal to or over 100.4° F. The Staff member dons N95/KN95, gloves, lab coat, and face shield while assessing the candidate with the oral thermometer.
• The forehead thermometer is confirmed for accuracy against the oral thermometer.

5.0 NCCTO

• The BB&T building is equipped with High Efficiency Particulate Air grade filters. The HVAC uses 100% outside air to eliminate the potential of infected air being recirculated throughout the building.
• Signs were clearly posted throughout the NCCTO notifying candidates, staff, and visitors of the need to social distance. In addition, there were markers on the floor, six feet apart, designating where people must stand while waiting to be checked out.
• Hand sanitizer stations were readily available throughout the NCCTO. Touch free hand sanitizer dispenser stations and hand sanitizer containers were placed in convenient locations, such as at entrances, exits, near elevators, and restrooms.
• All staff wear masks throughout their shifts. They maintain social distancing while interacting with candidates throughout the check-in and check-out process.
• An air flow fan was placed in the reception area near the reception desk to create more air flow while candidates momentarily remove their masks in order to capture a required photograph.
• Shields were custom fabricated and fitted on the slit lamps to provide a physical barrier between the SPs and the candidates.
• Breakroom chairs were removed or spaced to encourage social distancing.
• Office spaces for remote employees are closed. Shared equipment, such as photocopiers, etc., are provided cleaning and sanitizing solutions.
• Conference rooms are limited to only key meetings in which attendees can maintain six-foot distances from one another. Seats are arranged to not sit directly opposite each other across the conference room table. Conference rooms, tables, chairs and phones in common areas are sanitized before and after each use.
• NBEO’s Control Room has personnel manning all the cameras to aid in monitoring the wearing of masks of candidates and employees.
• If a COVID-positive individual is determined to have been present at the NCCTO, NBEO takes appropriate steps, including contacting a remediation company to conduct prompt cleaning, if necessary.

6.0 ENHANCED CLEANING PRACTICES

• All common areas and offices used daily are cleaned by staff throughout the day and in the evening using disinfectant products that meet EPA’s criteria for use against SARS-CoV-2. Unused offices and spaces are thoroughly disinfected weekly.
• Sanitation disposable wipes are used on each table or/and all non-porous high-touch surfaces throughout the day and each night.
• High-touch surfaces in examination rooms (e.g., desktops, tables, chairs, equipment, tools, doorknobs, faucet handles, light switches, etc.) are wiped down and disinfected before and after each encounter by the Standard Patients assigned to that room. Therefore, each testing room is sanitized 10-14 times per day. Sanitizing wipes are provided and stored in each area.
• Each night the NCCTO is fogged with an EPA N-list disinfectant by an Ultra-Low Velocity Fogger. Interior doors are left open with fans operating in the hallway throughout the night to facilitate airflow.

7.0 NBEO PARTICIPATION

Employees are provided with sanitizing wipes to clean high-touch surfaces such as their desktops, conference room tables, breakroom tables, before and after each use. All NBEO staff are trained to be vigilant to ensure that all safety measures are being followed.

8.0 CONCLUSIONS

The National Board of Examiners in Optometry has the duty to serve the public and the profession of optometry by administering exams even during these difficult times. EBI is of the opinion that, NBEO has effectively balanced their mission with their obligation to keep their staff and testing candidates safe by developing and implementing new policy changes in response to COVID-19. Additionally, NBEO is still actively exploring ways to ensure the safety and wellbeing of their candidates and staff. EBI has no recommendations for additional protocols, procedures, or precautions.

I would like to thank Dr. Jill Bryant, Executive Director, and Mr. Chris Pierce, Operations Administrator for their hospitality and assisting me with this assessment.

9.0 LIMITATIONS AND DISCLOSURE

EBI is not aware of any literature that specifically assesses the risk of SARS-CoV-2 transmission during optometry testing or provides guidelines to determine whether standard precautions adequately protect optometrist personnel when providing eye treatment. This assessment uses the latest safe practices guidance from various industries from the Center of Disease Control and Prevention, the American Industrial Hygiene Association, and the American Conference of Governmental Industrial Hygienist.

The information presented in this report relates to conditions present in the NBEO/NCCTO facility at the time of the assessment and also relies on information provided by site personnel at the time of the assessment and may not necessarily reflect conditions present at other times or locations. This report is intended to be used in its entirety for the purposes of National Board of Examiners in Optometry. NBEO may share this report or the contents thereof with third parties in NBEO’s sole discretion, including, but not limited to, by publishing the contents of the report on its website and/or through communications with candidates, employees, or other stakeholders, at NBEO’s sole risk and without liability to EBI Consulting. Any use of this document or portions of this report out of context or any application of this report for purposes other than those explicitly expressed above is done at the user’s sole risk.