

**Milton Academy**  
**COVID-19 School Policies**  
**January 2021**

**Policy Statement:** Milton Academy is implementing social distancing, cleaning, and hygiene policies effective immediately in an effort to minimize the spread of COVID-19 in our community. There are significant [health risks](#) associated with COVID-19. These policies apply to students, parents, faculty, and staff.

- 1. Masks and face coverings:** Students, faculty, and staff must wear face masks when in shared spaces with other people
  - Face masks must be worn in all shared spaces and all classes, including physical education. Masks must be worn in classrooms, hallways, bathrooms, and outside on pathways and when exercising on fields, unless during designated mask breaks or while eating
  - Fabric face masks are acceptable and must be worn in accordance with CDC guidance:
    - Wash your hands before putting on your mask
    - Put it over your nose and mouth and secure it under your chin
    - Try to fit it snugly against the sides of your face
    - Make sure you can breathe easily
    - CDC does not recommend use of masks or cloth masks if they have an exhalation valve or vent
  - Fabric face masks must be washed and dried according to [CDC guidance](#).
  - Milton will have disposable masks available upon entry into academic buildings and workspaces for students, faculty, and staff who do not have a fabric masks
- 2. Physical distancing:** Students, faculty, and staff should maintain six feet of distance between each other at all times unless a different instruction is provided (e.g., greater distance may be required for dining, physical education, and athletic activities).
  - Desks will be separated by six feet and students will sit facing forward
- 3. Occupancy limits:** Milton will abide by all state and local regulations with respect to occupancy limits.
  - All shared bathrooms have been reduced to 50 percent capacity and every other stall and every other sink will be used
- 4. Common areas and kitchen areas:**
  - Public kitchen areas are to be used at limited capacity consistent with posted guidance
  - Other common spaces will be closed unless approved by the division principal or an Administrative Council (Ad Council) member
- 5. Traffic patterns:** Students, faculty, and staff should follow all traffic patterns and foot paths, as indicated on campus including:

- One-way foot traffic in all buildings and staircases, identified by arrows that flow in one direction
  - Entrances and exits will be through different doors as indicated by signs
  - These patterns should be followed even if no one else is in the space.
- 6. Contact Tracing:** Limit movement between buildings as much as possible to ensure accurate tracing if necessary
- Lower School students will remain in their classrooms with their teachers
  - Middle School students will remain in their classrooms for most of their academic requirements and teachers will move from classroom to classroom
  - Upper School students will move from classroom to classroom and will be assigned to specific spaces during their free periods
  - Upper School and Middle School students and all faculty and staff must use swipe cards to access buildings
  - Upper School and Middle School students will have assigned seating in classrooms and must sit in those assigned seats for each class
  - If faculty or staff are entering a building that does not have a swipe card access, the employee must document that information in a log
- 7. Dining:** Students, faculty, and staff should eat facing forward and be at least six feet away from another individual while eating
- If eating inside, masks should be removed for eating and then put back on immediately
  - Outside eating will be available for students depending on the weather
    - When eating outside, at least six feet of distance must be maintained between students and students may not sit directly across from each other.
    - If students are sitting 10 or more feet apart they may sit in a circle.
- 8. Bus:** Students must sit distantly and wear face masks on the school bus.
- Students must wear masks while boarding and traveling on the bus
  - Students will sit one per bench in assigned seats, on alternating sides of the bench (window vs aisle seat)
  - Siblings may share the same bench
  - The bus will be filled from the back to the front for trips to school (students boarding at the first stops proceed all the way to the back)
  - For trips from school, students will sit dependent on their stop (students who get off at the last stop would sit at the back of the bus)
  - Windows open (weather permitting) to improve air circulation
  - No eating or drinking is allowed
- 9. Group gatherings and meetings:** Students, faculty, and staff must maintain six feet of distance during all group gatherings and meetings.
- Remote meetings and gatherings are encouraged
  - Meetings held indoors may have no more than three participants without explicit permission from the principal or an Ad Council member
  - Outdoor meetings where a distance of six feet can be maintained are permitted and encouraged

**10. Vehicles:**

- Employees who are using vehicles on campus will need to drive separately,
- If necessary, a Campus Safety officer will drive students to Faulkner Health Center.
  - Students and officers will wear face masks
  - Students will sit in the rear of the vehicle, behind the passenger seat
  - Windows will remain open at least six inches at all times during a transport
  - Vehicles will be cleaned by an electrostatic cleaner before and after vehicle use

**11. Hygiene and cleaning:** Hygiene protocols are being implemented to minimize the spread of COVID-19.

- All spaces will have hand sanitizer and supplies for disinfecting surface areas
  - Cleaners will wipe down surface areas and high-touch areas (doorknobs, light switches) in classroom spaces regularly
  - Students will wipe down their personal workspaces during the course of the day at the direction of their classroom teachers
- All sinks will have soap, hand sanitizer, and paper towels
  - Hand sanitizer will be available throughout campus buildings, including academic buildings and office spaces
  - If a bathroom is missing any of these supplies, please alert your teacher (students) or manager (employees)
- Signs will be posted around campus, including in bathrooms, to remind students, faculty, and staff to regularly wash their hands and of proper handwashing etiquette
- In addition, high-touch areas such as doorknobs, light switches, and restrooms will be regularly sanitized throughout campus by properly trained contracted cleaning staff

**12. Visitors:** Until otherwise notified, visitors are not permitted in campus buildings

- Ad Council may allow visitors under specific circumstances
- Parents are not permitted in buildings at this time

**13. Travel:** All community members who have recently traveled must abide by the [Commonwealth of Massachusetts guidelines](#), including the need to quarantine.

- Students and employees will be asked to attest to their compliance with the travel guidelines in their daily health attestation

## Student Health Attestation Policy

**Policy Rationale:** To minimize the risk of transmission of COVID-19 on campus, Milton Academy requires all students to attest each day that they do not have any signs or symptoms associated with COVID-19.

### Daily Attestation Procedures:

1. Milton requires all students, with the exception of fully remote students, to attest to their health prior to coming to campus each day.
  - Day students will attest through the use of the **WorkSafe/Live Safe** health attestation program
  - Boarding students will attest according to the policy of their individual house
  - Each school day, students in grades 9-12 must attest to their health
  - Parents of students in grades K-8 must attest to their child's health
2. Students must not come to school if they have any of the following signs or symptoms of COVID-19\*:
  - Fever (100.0° Fahrenheit or higher), chills, or shaking chills
  - Cough (not due to other known cause, such as chronic cough)
  - Difficulty breathing or shortness of breath
  - New loss of taste or smell
  - Sore throat
  - Headache *when in combination with other symptoms*
  - Muscle aches or body aches
  - Nausea, vomiting, or diarrhea
  - Fatigue, *when in combination with other symptoms*
  - Nasal congestion or runny nose (not due to other known causes, such as allergies) *when in combination with other symptoms*

**\* unless the director of nursing has received medical clearance from the student's primary care physician**

3. Each school day, day students in grades 9–12 or parents of students in grades K–8 must attest through the use of the **Work Safe** application that they are not aware that they (or their child) have been in close contact (within six feet for at least 15 minutes) with someone who has been diagnosed with COVID-19 within the last 14 days.
4. This attestation must be completed prior to the student's interaction with Milton Academy's on-campus programs, either boarding the bus or arriving on Milton's campus.
5. If the student has any signs or symptoms of COVID-19, as defined in this policy, or has been in close contact with someone who has been diagnosed with COVID-19 within the past 14 days, the student **may not** come to Milton's campus (day students) or attend classes (boarding students). Instead, the student should follow the attendance procedures established for the division. In addition,

- Boarding students must contact the duty person before 8 a.m. for further instructions
  - Day students must notify their health care provider of sign(s) or symptom(s)
    - A student who exhibits signs or symptoms of COVID-19 may return to campus **with the approval of a healthcare provider only once the following two conditions are met:**
      1. The student is symptom-free, including fever free, for 24 hours without any fever-reducing medication AND
      2. At least 10 days have passed since symptoms first appeared
    - A student who has been a close contact may return to campus after 14 days and a negative COVID test.
6. The director of nursing monitors student health attestations regularly. The director of nursing, or designee, follows up with those individuals who do not complete the attestation **or** who report any COVID-19 signs or symptoms.
- If the student regularly does not complete the attestation process, if the student refuses to complete the attestation process, or if the student does not complete the attestation process honestly, the student will be asked to leave campus
    - The COVID-19 Coordinator will review attestation compliance and if there is a pattern of not properly completing the attestation form, the student may be excluded from campus and subject to discipline

## **COVID-19 Positive Case Protocol for Milton Academy**

COVID-19 is an evolving virus that requires us to continually review our protocols and ensure they are consistent with the latest public health, governmental, and medical guidance. Our Health Center Team, led by Dr. Areej Hassan, attending physician at Boston Children's Hospital and assistant professor of pediatrics at Harvard Medical School, and Peg Reardon, director of nursing, will periodically update and adjust COVID-19 protocols.

This policy provides information about the guiding principles used to determine the actions that Milton will take if there is a COVID-19-positive student or employee on campus, including isolation, quarantine, and reporting protocols. Protocols regarding quarantine, isolation, and case reporting are guided by public health professionals, medical professionals, and confidentiality.

### **When will Milton Academy move to remote learning for a COVID-19 positive case?**

The Massachusetts Department of Public Health and the Milton Board of Health will guide our decisions regarding the closure of any part or all of our campus. However, the following are circumstances where we may need to move to remote learning for a division or the School:

1. Infections occur in multiple divisions, especially if these cannot be traced to a single individual
2. Multiple infections occur in one area of the school that suggests the possibility of community spread within the School
3. Multiple infections occur in different classroom cohorts within a division
4. An off-campus activity is linked to a COVID-19 case and multiple community members participated in that activity (e.g., a party)
5. An increase in cases in Milton or surrounding area that demonstrates a significant risk of community spread

### **What will happen if there is a COVID-19 positive case that does not require the school to move to remote learning?**

1. Any COVID-19 positive test result that Milton Academy receives from its testing protocol is automatically reported to the Massachusetts Department of Public Health
2. Our COVID-19 Coordinator reports all COVID-19 positive test results that we receive for those who are on campus and while school is in session to the Milton Board of Health. The Milton Board of Health guides necessary next steps for notification, quarantine, and isolation
3. Public health guidance may change during the course of the year. With this in mind, the following guidelines are a premise for decisions in January but may be modified as recommended by public health experts, medical experts, and government guidance:
  - If a student or employee tests positive for COVID-19 within a classroom cohort in the Lower School or Middle School, the cohort will be quarantined and instructed

- to receive appropriate medical attention. The school nurse will notify parents.
- If a student in the Upper School sits adjacent to another student who tests positive for COVID-19, the school nurse will notify parents so they can quarantine their child and seek appropriate medical attention for their child
  - If a student who is riding the bus sits adjacent to someone who tests positive for COVID-19, the school nurse will notify parents so they can quarantine their child and seek appropriate medical attention for their child
  - If an adult in the Upper School tests positive for COVID-19, the school nurse will notify as quickly as possible the parents of all students who had close contact (within six feet for 15 minutes in 24 hours or sat adjacent) with that adult within 48 hours of the adult's positive test so parents can quarantine their child and seek appropriate medical attention for their child
  - After initial contact tracing, a school nurse will notify the parents of any student who is identified as a close contact (within six feet for 15 minutes or more) of a student or adult who has tested positive for COVID-19 so that they can quarantine their child and seek appropriate medical attention

### **Division-wide and School-wide communication protocols**

1. The director of nursing and COVID-19 coordinator will notify parents and employees within a division if there is a student or adult who tests positive for COVID-19 in that division
2. The COVID-19 coordinator and director of nursing may notify parents and employees of other positive test results when circumstances indicate that is necessary (e.g, cases in multiple departments or divisions or several cases in one area of the school that impacts the whole community)
3. The director of nursing will post these notices regularly to MyMilton so that information can be accessed by families in our secure portal
  - Please note: these notices will **not** provide identifying information in order to protect the confidentiality of COVID-19 positive students and employees
4. If a member of a staff department tests positive for COVID-19, the department head will notify their department
  - Notification will be made to close contacts so that quarantine can start
  - The assistant director of human resources will post notices about COVID-19 positive employees on the ADP portal
  - Please note: these notices will **not** provide identifying information in order to protect the confidentiality of COVID-19 positive students and employees
5. The COVID-19 Coordinator will notify the Milton Board of Health of any positive case to ensure proper reporting and to facilitate contact tracing
6. The head of school will send a notification to all parents and employees if there is a whole school closure due to COVID-19

**COVID-19 Policy**  
**Protocol for Positive COVID-19 Test for Students**

**Policy Rationale:** To minimize the risk of transmission of COVID-19 on campus, Milton Academy has a notification and tracing policy to manage any student who is diagnosed with COVID-19.

**Student Responsibility:**

Students must comply with the COVID-19 testing protocols determined by Milton Academy.

**School Responsibility:**

1. If a student tests positive for COVID-19, the director of nursing or designee will immediately notify the following people:
  - The student's legal guardian(s)
  - The student's division head
  - The student
  - The COVID-19 Coordinator
  
2. If the student is informed about the diagnosis while at Milton Academy, the School will isolate the student and ensure that the student receives proper medical care. To accomplish this, the student will either immediately isolate in a campus isolation room until a nurse is able to see them or proceed to Faulkner Health Center
  - Day students will remain in the isolation room until a parent or legal guardian is able to take them home. An adult caretaker from Milton will remain with the student until the student leaves campus with a parent or legal guardian
  - Boarding students will proceed to Faulkner Health Center, with an adult caretaker, where the student will be assisted by a nurse, examined, and taken to an isolation space in Faulkner
  
3. Boarding students who are diagnosed with COVID-19 will remain in Faulkner only as directed by Milton's consulting physicians from Children's Hospital
  - Students who are not able to travel home will remain in isolation in one of Milton's dedicated isolation rooms in Faulkner
  
4. Any student who requires significant medical care to address COVID-19 symptoms will be transported to a hospital

**Procedures to follow if a student tests positive for COVID-19:**

1. As soon as possible, and while the student is in isolation, the director of nursing, or designee, will investigate where the student has been on campus.

- The student will be interviewed to confirm as much information as possible, including those who may have been in close contact with the student.
  - The investigation will include tracing the student's whereabouts on campus using data from the Milton Academy building access system and from assigned seating charts as well as interviews with the student's teachers, activity leaders, and coaches
2. The COVID-19 Coordinator, or designee, will contact the Milton Board of Health to inform them about the positive diagnosis and follow any instructions provided by the Director or designee.
  3. Individuals with whom the student has been in close contact (students, parents, and employees) will be notified by the director of nursing or designee that they have been in close contact with someone who has tested positive for COVID-19 and must follow quarantine guidance as provided by the Board of Health. Please note that Milton Academy may exclude students and employees from campus for a longer period of time than is recommended by the Board of Health.
    - Close contact is defined as:
      1. Any person who has been within six feet for at least 15 minutes in a 24-hour period with the individual who tests positive for COVID-19
      2. In the Lower School and Middle School, any student who is a part of the same learning cohort
      3. In the Upper School, any individual whose desk is adjacent to the COVID-19 positive student or adult
    - Close contacts will be placed into quarantine, with day students and boarding students who live within driving distance of Milton returning home
    - Boarding students who are unable to return home for their period of quarantine will remain in a quarantine room in Faulkner Health Center or another identified location for the duration of their quarantine
  - The legal guardians of any students with whom the infected person has had close contact will also be notified by a school nurse
  - Milton Academy will provide the appropriate contact information to the Board of Health with student names and contact information for their parent for any student who is considered to be a close contact of an individual diagnosed with COVID-19
  - The name of the diagnosed individual will not be revealed without the permission of the student and their parents
    4. Based on the assessment of and in consultation with public health authorities, the chief human resources and risk officer and the head of school will evaluate the need for evacuating any part of campus.
      - If an evacuation in the Lower School, Middle School or Upper School is necessary, the division principal will notify the parents and employees of the division
      - If an evacuation of the entire campus is necessary, the head of school will notify the parent and employee community

5. Following public health guidance, targeted cleaning will be performed on any areas that the COVID-19 positive student has occupied.
6. Further disinfecting and sanitizing will be conducted in accordance with public health guidelines by contracted Milton cleaning staff.

### **Confidentiality of information and Communication Protocol:**

1. Information about a positive case on campus will be shared as necessary to maintain the safety of the Milton Academy community and protect the confidentiality of the student.
  - Two individuals will automatically be notified about any positive case and have the authority to determine others who need to know the identity of the COVID-19 diagnosis
    - Todd Bland, head of school
    - Deborah O'Toole, chief human and risk resources officer
  - Parents of students who are considered to be close contacts will receive a phone call from a school nurse notifying them that their student has been in close contact with an individual who has tested positive for COVID-19. Parents will be advised to seek medical attention and quarantine.
  - Parents will receive a follow up letter from the director of nursing with detailed instructions about seeking medical attention and quarantine.
  - Parents within the division where the infection occurs will receive an email communication from the health center that a student has been diagnosed with COVID-19 and is being quarantined.
    - This communication will be maintained on the secure MyMilton portal so that it is accessible to parents in other divisions
  - The head of school will notify the parent and employee community if it is necessary to vacate the whole school and move to remote learning for any period of time.
2. All information about a COVID-19 diagnosis will be maintained confidentially by the Health Center in the student's medical file. Information about the COVID-19 diagnosis will not appear in a student's academic record.

### **Discontinuance of Isolation and Return to School**

Students may discontinue isolation and return to school after a positive COVID-19 diagnosis once they have completed the protocols recommended by the Centers for Disease Control and Prevention (CDC)/Department of Public Health and once they provide documentation that they have been medically cleared by a healthcare provider.

- Symptomatic students may adhere to the symptom-based strategy recommended by the CDC:
  - At least 10 days have passed since symptom onset

- At least 24 hours have passed since resolution of fever without the use of fever-reducing medication
- Other symptoms have improved
- Asymptomatic students will need to follow the test-based strategy delineated by the CDC.
  - Persons infected with SARS-CoV-2 who never develop COVID-19 symptoms may discontinue isolation and other precautions 10 days after the date of their first positive RT-PCR test for SARS-CoV-2 RNA

## Employee Health Attestation Policy

**Policy Rationale:** To minimize the risk of transmission of COVID-19 on campus, Milton Academy requires all employees to attest each day that they do not have any signs or symptoms associated with COVID-19.

### Daily Attestation Procedures:

1. Milton requires all employees, with the exception of fully remote employees, to attest to their health each day through the use of the **WorkSafe/Live Safe** health attestation program.
  - Each work day employees must attest to their health before 8 am or at least 60 minutes before the start of their shift for those who work afternoon or evening hours
2. Employees must not come to school if they have any of the following signs or symptoms of COVID-19\*:
  - Fever (100.0° Fahrenheit or higher), chills, or shaking chills
  - Cough (not due to other known cause, such as chronic cough)
  - Difficulty breathing or shortness of breath
  - New loss of taste or smell
  - Sore throat
  - Headache *when in combination with other symptoms*
  - Muscle aches or body aches
  - Nausea, vomiting, or diarrhea
  - Fatigue, when in combination with other symptoms
  - Nasal congestion or runny nose (not due to other known causes, such as allergies) *when in combination with other symptoms*

**\* unless the human resources office has received medical clearance from the employee's primary care physician**

3. Each school day, employees must attest through the use of the **Work Safe/Live Safe** application that they are not aware that they have been in close contact (within six feet for at least 15 minutes) with someone who has been diagnosed with COVID-19 within the last 14 days.
4. This attestation must be completed prior to the employee's interaction with Milton Academy's on-campus programs.
5. If the employee has any signs or symptoms of COVID-19, as defined in this policy, or has been in close contact with someone who has been diagnosed with COVID-19 within the past 14 days, the employee **may not** come to Milton's campus. Instead, the employee should follow the attendance procedures established for the department or division.

- In addition, employees must notify their health care provider of sign(s) or symptom(s)
  - An employee who exhibits signs or symptoms of COVID-19 may return to campus **with the approval of a healthcare provider only once the following three conditions are met:**
    - The employee is symptom-free, including fever free, for 24 hours without any fever reducing medication AND
    - At least 10 days have passed since symptoms first appeared AND
    - The employee has received a negative COVID test
  - Employees may work remotely during their quarantine
6. The assistant director of human resources monitors health attestations daily; the assistant director of human resources, or designee, follows up with those individuals who do not complete the attestation **or** who report any COVID-19 signs or symptoms.
- If the employee regularly does not complete the attestation process, if the employee refuses to complete the attestation process, or if the employee does not complete the attestation process honestly, the employee will be asked to leave campus.
    - The COVID-19 Coordinator will review attestation compliance and if there is a pattern of not properly completing the attestation form, the employee will be subject to discipline

## **COVID-19 Policy**

### **COVID-19 Positive Test Protocol for Employees**

**Policy Rationale:** To minimize the risk of transmission of COVID-19 on campus, Milton Academy has a notification and tracing policy to manage situations when an employee is diagnosed with COVID-19.

#### **Employee Responsibility:**

1. An employee must **immediately** inform Emily Cincotta, assistant director of human resources, at [emily\\_cincotta@milton.edu](mailto:emily_cincotta@milton.edu) or 617-898-2287 that they have been diagnosed with COVID-19 or is actively seeking a medical diagnosis of COVID-19.
  - If the employee is informed about the diagnosis while at Milton Academy, the employee will leave campus immediately or will isolate in the nearest campus isolation room until the employee is able to leave campus.
  - The assistant director of human resources will notify the employee's manager and the COVID-19 Coordinator that the employee will be absent.

#### **Procedures to follow if an employee tests positive for COVID-19:**

1. As soon as possible, the COVID-19 Coordinator, or designee, will investigate where the employee worked and traveled on campus.
  - The employee will be interviewed to confirm as much information as possible (including areas on campus where the employee was physically present within the past 14 days and all employees/students with whom the employee may have had close contact during that time)
  - The investigation will include tracing the employee's whereabouts using data from the Milton Academy building access system and sign in logs for entrances to buildings with the use of a key
2. The COVID-19 Coordinator, or designee, will contact the director of the Milton Board of Health to inform them about the positive diagnosis and follow any instructions provided by the board of health.
  - Individuals with whom the employee has been in contact (students and their parents or employees) will be notified that they have been in contact with someone who has tested positive for COVID-19
    - The name of the diagnosed individual will not be revealed without their permission
  - Individuals who have been in close contact (within six feet for more than 15 minutes in a 24 hour period) with the employee diagnosed with COVID-19 will be notified that they must quarantine in accordance with board of health guidelines and be off campus for 14 days
3. Based on their assessment and in consultation with public health authorities, the chief human resources and risk officer and the head of school will determine the safest course of action, which could include evacuating or vacating any parts of campus
  - If an evacuation of Milton Academy is necessary, the Milton Academy community will be notified by the Head of School

- If campus or a portion of campus is closed as a result of a positive COVID-19 diagnosis, all employees with remote work capabilities will be expected to work from home while the office is closed. Each employee should consult with their manager for additional instructions as to remote work and related expectations.
4. The employee's work area will be vacated and targeted cleaning will be performed of the area following public health guidance.
  5. Further disinfecting and sanitizing will be conducted in accordance with public health guidelines by contracted Milton cleaning staff.

**Confidentiality of information:**

1. Information about a positive case on campus will be shared only as necessary to maintain the safety of the Milton Academy community.
  - Two individuals will automatically be notified about any positive case and have the authority to determine others who need to know the identity of the COVID-19 diagnosis
    - Todd Bland, head of school
    - Deborah O'Toole, chief human resources and risk officer
2. All information about the employee diagnosed with COVID-19 will be maintained confidentially in a separate medical file. This information will not be maintained in the employee's personnel file.

**Employee Discontinuance of Isolation and Return to Work:**

Employees may discontinue isolation and return to work after a positive COVID-19 diagnosis once they have completed the protocols recommended by the CDC/DPH and once they provide documentation that they have been medically cleared by a health care provider.

- Symptomatic employees may adhere to the symptom-based strategy recommended by the CDC.
  - At least 10 days have passed since symptom onset and
  - At least 24 hours have passed since resolution of fever without the use of fever-reducing medication and
  - Other symptoms have improved
- Asymptomatic employees will need to follow the test-based strategy delineated by the CDC.
  - Persons infected with SARS-CoV-2 who never develop COVID-19 symptoms may discontinue isolation and other precautions 10 days after the date of their first positive RT-PCR test for SARS-CoV-2 RNA

### **When will Milton Academy move to remote learning for a COVID positive case?**

The Massachusetts Department of Public Health and the Milton Board of Health will guide our decisions regarding the closure of any part or all of our campus. However, there are several circumstances where we anticipate closing the division or the School:

1. Infections occur in multiple divisions, especially if these cannot be traced to a single individual
2. Multiple infections occur in one area of the school that suggests the possibility of community spread within the School
3. Multiple infections occur in different classroom cohorts within a division
4. An off campus activity is linked to a COVID-19 case and multiple community members participated in that activity (e.g., party)
5. An increase in cases in Milton or surrounding area that demonstrates a substantial risk of community spread