RE: Cal/OSHA Board Adopts Emergency Regulations Regarding COVID-19

#### Effective November 30, 2020.

SCCSIG Joint Pool Association Members.

On November 19, 2020, pursuant to emergency rulemaking authority, the California Occupational Safety and Health Standards Board ("OSHSB") adopted <u>temporary regulations</u> regarding measures that all employers must undertake in order to prevent the spread of COVID-19 in the workplace ("emergency regulations").

The emergency regulations take effect today, November 30, 2020, and apply to all employers and places of employment, with very limited exceptions (such as businesses where all employees work remotely, or only one employee is employed who does not have contact with others). Therefore, schools and colleges must take immediate action to ensure that their policies and practices conform to and comply with the new regulations. Most significantly, employers must prepare, implement, and maintain a written COVID-19 Prevention Program ("CPP"), as described below.

The emergency regulations supplement general and industry-specific guidance that the Division of Occupational Safety and Health ("Cal/OSHA") has provided since the beginning of the present public health emergency.

#### **Preamble**

This is a fillable template that the District may complete to ensure compliance with the COVID-19 Emergency Temporary Standard. Instructions in blue font enclosed in brackets indicate where to enter worksite-specific information. Additional editing will be warranted, as needed, to ensure the written program is customized to actual workplace conditions and characteristics.

With very few exceptions, all employers and places of employment including public schools are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)).

California Public School Districts are not required to use this specific CPP, they may create their own program or use another CCP template from another resource. Districts can also create a written CCP by incorporating this program into their existing Injury and Illness Prevention Program (IIPP), if desired. We encourage the Districts to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this CPP alone does not ensure compliance with the emergency temporary standards. To use this CPP effectively, the person(s) responsible for implementing the CPP should carefully review the following on a regular basis for updates, alerts, amendments and new regulations as they may develop, change or be modified:

All of the required elements within your CPP can be referenced in the following CCR, Title 8 sections:

• 3205, COVID-19 Prevention

- 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
- 3205.2, Major COVID-19 Outbreaks
- 3205.3, Prevention in Employer-Provided Housing
- 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
- The four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.

The additional guidance materials available at the following links...

- www.dir.ca.gov/dosh/coronavirus/
- https://www.sccsig.org/
- <a href="https://www.keenan.com/COVID-19">https://www.keenan.com/COVID-19</a>
- http://ascip.org/covid-19/
- https://www.sccgov.org/sites/covid19/Pages/home.aspx
- <a href="https://www.sccoe.org/reopening-schools/Pages/default.aspx">https://www.sccoe.org/reopening-schools/Pages/default.aspx</a>
- https://www.cdc.gov/coronavirus/2019-nCoV/index.html

Note: It is recommended that your CPP become part of your IIPP (Injury Illness Prevention Plan).

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# **CPP**

# **COVID-19** Prevention Program

### What is Corona Virus Disease (COVID-19)

On February 11, 2020 the World Health Organization <u>announced</u> an official name for the disease that is causing the 2019 Novel Corona Virus outbreak, first identified in Wuhan China. The new name of this disease is Corona Virus disease 2019, abbreviated as COVID-19.

There are many types of human coronaviruses including some that commonly cause mild upper respiratory tract illnesses. COVID-19 is a new disease, caused by a Novel (or new) Corona Virus that has not previously been seen in humans. The name of this disease was selected following the World Health Organization's (WHO) best practice for naming of new human infectious diseases.

### How Does the Virus Spread (COVID-19)?

The virus that causes COVID-19 is thought to spread mainly from person to person through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths and/or noses of people who are nearby or possibly be inhaled into the lungs. Spread is more likely when people are in close contact with one another (within about 6 feet).

COVID-19 seems to be spreading easily and sustainably in the community (community spread) in <u>many affected geographic areas</u>. Community spread means people have been infected with the virus in an area, including some who are not sure how or where they became infected.

It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or eyes. This is not thought to be the main way the virus spreads, but the Center for Disease Control and Prevention (CDC) is still learning more about how this virus spreads.

COVID-19 Prevention Program (CPP) for MORGAN HILL UNIFED SCHOOL DISTRICT (MHUSD)

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

Date: December 9, 2020

### **Authority and Responsibility**

Anessa Espinosa, Director of Facilities and Noel Weeks Santa Clara County Health Department COVID Coordinator have overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

### **Identification and Evaluation of COVID-19 Hazards**

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the Appendix A: Identification of COVID-19 Hazards form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- Create site-level Safety Teams
- Conduct site audit to review/resolve the procedures and processes on this checklist
- Based on site audit, create a list of needed items to ensure compliance with safety measures

#### **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by participating on a local site safety team and by conducting recommended health screening for students and staff (form attached).

### **Employee screening**

Employees will self-screen and take their temperature before entering the facility according to CDPH guidelines. Touchless thermometers are provided at each workplace front office.

#### Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B**: **COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

The Health & Safety Task Force has created a list to be used by the Site Safety Teams to ensure safe and healthy work conditions, practices and procedures are being met based on the MHUSD's School Site Safety Measure Checklist (attached).

#### **Control of COVID-19 Hazards**

### **Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

### Arrival/departure

- Buses-ensure appropriate unloading procedures (front of bus to back of bus, on individual at a time) to allow for distancing.
- Utilize as many entrances and exits on campus as can be supervised appropriately to decrease crowding at entry and exit points. Campuses remain closed except to students and staff. Access points are only open for student and staff entrance at the start of the day and open for student and staff exit at the end of the day.
- Designate routes for entry and exit and create clear signage and directional arrows.
- Instruct drivers to remain in their vehicles when dropping off or picking up students. When in-person
  drop-off is needed, a single parent or caregiver will call the front office for instructions on how to
  proceed. Offices are closed for walk-in assistance; however, phone numbers are posted on the front
  door so that a visitor can call to request curbside assistance.
- Mark spaces six feet apart for students waiting outside to be picked up. Ensure release times allow for each cohort to wait for pickup appropriately distanced from one another.
- Provide supervision to disperse student gatherings and ensure distancing during school arrival and departure.
- Train those supervising to encourage students and any accompanying adults to engage in safe behaviors, including wearing a face covering and staying six feet apart from others while traveling to school.
- Provide marks on the ground six feet apart where students can stay distanced while waiting for school to begin and end each day.
- Check bicycle racks and add signage or block areas to encourage maintaining distance from each other.

#### Classroom setting

#### Elementary schools

Students will be screened prior to entry on campus and will remain six feet apart from others as they

proceed to their classrooms.

- Ensure cohorts of students and staff remain stable for the entire school day while on campus.
- Review schedules, including recess and lunch to ensure students do not mix with other stable classroom cohorts.
- Space student desks at least six feet apart.

### Middle and High schools

Space student desk at least six feet apart.

#### **All Schools**

- Class sizes should be only the size which would allow for maintaining six feet apart of desks when indoors.
- Distance teacher and staff desks at least six feet away from students' desks to minimize the risk of adult-to-child and child-to-adult disease transmission.
- Assign stable seating arrangements for students to ensure that close contacts within classrooms are minimized and easily identifiable.
- Consider moving classrooms or other activities to outdoor spaces and other larger spaces to allow for greater distancing between students.
- Train staff and students to maintain at least six feet of distance from each other.
- Instruct staff to leave windows and doors, if possible open during occupancy.
- Remove or mark for non-use furniture and equipment in the classroom to facilitate six feet of distancing and to reduce high-touch surfaces.
- Student desks face same direction (not facing each other).
- Ensure adequate supplies to eliminate need for sharing of high-touch materials (art supplies, equipment, electronic devices, etc.) or limit use of supplies and equipment to one group of students at a time and clean and disinfect between uses.
- Verify a system to keep students' belongings separate so that students do not come in contact with other students' belongings.
- Place markings on classroom floors to facilitate physical distancing and ensure desks remain in place.
- All staff has been informed to reach out to the front office if classroom cleaning and disinfecting supplies are running low: hand sanitizer, paper towels, disinfecting spray, soap for classrooms with sinks.

#### Non-Classroom setting

Staff Break Rooms, Offices and Workspaces are modified to avoid gathering (stack chairs, maximum

occupancy signs, six feet distance between seated workstations).

- Restrooms: Ensure certain groups of students assigned to use certain restrooms and that adequate supervision of restrooms to avoid congregation and maintain physical distancing.
- Libraries: Closed until further notice, but individual teachers may select materials for classroom use.
- Cafeterias: Serve meals in classrooms or outdoors, instead of cafeterias.
- Physical Education, Playgrounds and Recess: Conduct activities outdoors with appropriate physical
  distancing within cohorts. Hold outdoor activities in separated areas designated by class and/or
  staggered throughout the day, in favor of physical activities that require less contact with surfaces and
  allow for physical distancing by placing markings on the ground.
- Follow latest CDC guidance regarding opening or closing of playgrounds.
- Cohort based supervision while out at recess and lunch (elementary).
- Ensure to schedule staff supervision to ensure social distancing (playgrounds, eating areas, restrooms)
- Create small-sized first aid kits for yard supervisors to carry that include: hand sanitizer, face coverings, gloves.
- Lockers: Eliminate use of all lockers.
- Hallways: Create schedules or procedures for movement through hallways to avoid crowding.
   Examples: stagger passing times or establish designated one-way walking/passage areas.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

#### **Face Coverings**

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Students and staff are required to have their own face covering. Should a student and/or staff member come without one or it's lost during the day, a face covering will be provided in the office.

- Create expectations and provide training that everyone must wear a face covering at all times while on campus.
- Face coverings must be worn during indoor physical conditioning and training or physical education classes. Activities that require heavy exertion may be conducted outside in a physically distanced manner without face coverings. Activities conducted inside should be those that do not require heavy exertion and can be done with a face covering. Students should take a break from exercise if any difficulty in breathing is noted and should change their face covering if it becomes wet and sticks to the student's face and obstructs breathing.
- Identify students who may be excluded from face covering requirement, including: (1) anyone who has
  trouble breathing or is unconscious, incapacitated, or otherwise unable to remove the covering without

assistance and (2) students with special needs who are unable to tolerate a face covering, as approved by SPED Director and team. Each site shall explore accommodations, including remaining in distance-learning, for students unable to safely wear a face covering.

- Post age-appropriate signage and place signs at appropriate height for the little ones in high visibility areas to remind students and staff that face coverings are required.
- Create a communication plan to all staff and families regarding expectations for use of face coverings at school and how to wash them.
- Create age-appropriate brief lessons to educate students on the rationale and proper use of face coverings.
- Parents should be reminded to send an additional clean mask with the child each day.
- Ensure that plastic face shields have been ordered and are on-site for any staff member who requests to wear a clear face shield in addition to their face covering.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis, including an accommodation to work remotely with verification by physician of necessity to keep face uncovered.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept
  at least six feet apart. Any employee not wearing a face covering, face shield with a drape or other
  effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all
  other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

### **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- Circumstances where the amount of outside air needs to minimized due to other hazards, such as heat and wildfire smoke.
- Where it is possible. increase filtration efficiency to the highest level compatible with the existing ventilation system.
- Increase the number of filter changes throughout the year.
- HVAC units will go on at least one hour before school begins and remain on at least one hour when school ends for the day.
- Allow for doors and windows to remain open when students are present.

### Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces:

- Ensuring adequate supplies are available for each site.
- Spray disinfectant and paper towels are available for each classroom and office space in order to regularly disinfect (at least daily) frequently touched hard spaces pursuant to CDC guidance (tables, desks, chairs, door handles, light switches, phones, copy/fax machines, restroom surfaces and playground equipment).
- Remove cloth and porous surface items that are difficult to clean and disinfect (pillows, rugs, bean bag chairs, etc.).
- Daily sanitizing of all classrooms and restrooms. Sanitizing may include the use of electrostatic sprayers.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

- Notify Noel Weeks, District's Santa Clara County Department of Health COVID Coordinator weeksn@mhusd.org.
- Communicate that parents/guardians must notify school administration immediately if the student or staff tested positive for COVID-19 or if one of their household members or non-household close contacts tested positive.
- Upon the site receiving notification that a staff member or student has tested positive for COVID-19 or been in close contact with someone who has, contact Noel Weeks and Human Resources IMMEDIATELY.
- Students/staff who test positive and have completed isolation requirements as recommended by COVID Coordinator Noel Weeks, do not require a medical note or a negative test prior to returning to school/work.

PPE must not be shared, e.g., gloves, goggles and face shields etc.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by using the spray disinfectant and paper towels provided to each classroom and wipe down all surfaces and/or items after each use.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

#### Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Create brief age-appropriate lessons (video, home room, PA, etc.) to teach and reinforce proper handwashing and sanitizing techniques.
- Post age-appropriate signage and place signs at appropriate height for the little ones in high visibility areas to remind students and staff of proper handwashing techniques.
- Free-standing handwashing stations will be installed around the campus.
- Ensure adequate supplies at each sink including soap and paper towels.
- Ensure hand sanitizer is available in high traffic locations for staff and student use. Staff and students should use hand sanitizer whenever entering and exiting the classroom or office space.

- Create hand washing or sanitizing protocols for al transitions (arrival, entering class, after recess/lunch, returning from restroom, etc.)
- Encouraging and allowing time for employee handwashing.
- Encouraging employees to wash their hands for at least 20 seconds each time.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

### **Investigating and Responding to COVID-19 Cases**

This will be accomplished by using the Appendix C: Investigating COVID-19 Cases form.

Employees who had potential COVID-19 exposure in our workplace will be:

- Offered COVID-19 testing information locations.
- Contacted by COVID Coordinator Noel Weeks for each suspected or confirmed case of COVID. All
  guidance regarding isolation, quarantining, and returning will be directed by her.
- Communicate with students and staff that they will need to get tested or provide a note from a medical
  provider after they develop one or more COVID-19 symptoms OR if one of their household members
  or non-household close contacts tested positive for COVID-19.
- Contact Human Resources for information regarding leave benefits.

### **System for Communicating**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Symptoms and possible hazards should be reported to site administration/office staff and Noel Weeks.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Human Resources will send regular communications to all employees with information on obtaining free COVID-19 testing. Staff and students can also contact their health care provider for locations.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. The District is working with Santa Clara Schools Insurance Group to administer self-testing.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-

- 19 policies and procedures.
- The District is emailing all staff and/or individual staff members for any updates, outbreaks and/or changes that the Santa Clara County Health Department is issuing.

### **Notification Requirements**

AB 685 — Notice Obligations for COVID-19 Exposures in the Workplace and Cal/OSHA Enforcement Changes (Effective Jan. 1, 2021)

AB 685 prescribes notice requirements on employers in the event of a COVID-19 exposure in the workplace, enhances reporting requirements to local health authorities in the event of a COVID-19 outbreak, and expands the Division of Occupational Safety and Health of California's (Cal/OSHA) authority to shut down worksites deemed to be an "imminent hazard" due to COVID-19 and issue "serious violation" citations.

Under AB 685, private and public employers who receive notice of a potential exposure to COVID-19 must do the following within one business day:

- Provide written notice to all employees, and the employers of subcontracted employees, who were on the premises at the same worksite as the "qualifying individual" within the infectious period that they may have been exposed to COVID-19.
- Provide written notice to the exclusive representative (union), if any, of the employees above.
- Provide all employees who may have been exposed and their exclusive representative, if any, with information regarding COVID-19-related benefits to which they may be entitled, including but not limited to worker's compensation, COVID-19-related leave, and paid sick leave, as well as the employer's antidiscrimination and anti-retaliation policies.
- Provide notice to all employees, the employers of subcontracted employees, and the exclusive representative, if any, of the disinfection and safety plan that the employer plans to implement and complete, per CDC guidelines.

The written notice provided to employees may include, but is not limited to, personal service, email or text message if it can reasonably be anticipated to be received by the employee within one business day of sending and shall be in both English and the language understood by the majority of the employees.

AB 685 also imposes reporting obligations on employers who are notified of a COVID-19 outbreak, as defined by the CA Department of Public Health. Within 48 hours of learning of the outbreak, employers must notify the local public health agency in the jurisdiction of the worksite of the names, number, occupation and worksite of qualifying individuals, as well as the employer's business address and NAICS code of the worksite where the qualifying individuals worked. Following the reporting of an outbreak, the employer must continue to give notice to the local health department of any subsequent laboratory-confirmed cases of COVID-19 at the worksite.

The new law also adds a section to the Labor Code which specifically provides that Cal/OSHA can shut down or prohibit operations at a worksite when, in the opinion of Cal/OSHA, a worksite or operation "exposes workers to the risk of infection" of COVID-19 so as to constitute an imminent hazard. In addition, it eliminates the requirement that Cal/OSHA provide to the employer its notice of intent (1BY) to issue a "serious violation" citation for COVID-19 related hazards. This means that employers no longer have a "15-day window" to respond to the notice with evidence to support their defense before a citation can be issued. This provision of the bill will expire on January 1, 2023.

This bill amends sections 6325 and 6432 of the Labor Code and adds section 6409.6 to the Labor Code

### Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - o COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment
   face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- The District has created documents that have been shared with District staff which includes COVID exposure frequently asked questions, reopening school action plan, site health and safety check list and formed a Healthy Safety Task Force and Site Safety Teams.

Appendix D: COVID-19 Training Roster will be used to document broad communications and information sources.

### **Exclusion of COVID-19 Cases**

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace per CDC and public health guidance after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by through Human Resources and the applicable leave acts.
- Providing employees at the time of exclusion with information on how to best communicate with Human Resources regarding leave benefits.

### Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the Appendix C: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

### **Return-to-Work Criteria**

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - o COVID-19 symptoms have improved.
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work
  until a minimum of 10 days have passed since the date of specimen collection of their first positive
  COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

The update IIPP/COVID 19 Plan has been approved by the Morgan Hill Unified School District Safety Committee with contributions from the District's Health & Safety Task Force.

### **Appendix A: Identification of COVID-19 Hazards**

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation	the evaluation:	the	conducting	Person
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Date:

Name(s) of employee and authorized employee representative that participated:

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

### **Appendix B: COVID-19 Inspections**

Review the information available at <u>www.dir.ca.gov/dosh/coronavirus/</u> for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace.

#### Date:

Name of person conducting the inspection:

#### Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

### **Appendix C: Investigating COVID-19 Cases**

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

#### Date:

### Name of person conducting the investigation:

Employee (or non- employee*) name:	Occupation (if non- employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):	Date investigation was initiated:	
Was COVID-19 test offered?	Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:	Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:	Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	

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Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
	Date:		
All employees who may have had COVID- 19 exposure and their authorized representatives.	Names of employees that were notified:		
	Date:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Names of individuals that were notified:		

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

<sup>\*</sup>Should an employer be made aware of a non-employee infection source COVID-19 status.

Appendix D: COVID-19 Training/Communication/Resources Roster

Date:

Person that conducted the training:

Communication/Resource	Date/Location	Person Responsible

Note: Additional copies of this sheet may be necessary.

### **Additional Consideration #1**

### Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

### **COVID-19 testing**

- We will provide information for free COVID-19 testing to all employees who have been exposed in the workplace. COVID-19 testing will be provided at no cost to employees.
- COVID-19 testing consists of the routine screening as well as recommended testing following a possible exposure. We will provide information on testing when deemed necessary by Cal/OSHA.

### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria requirements, and local health officer orders if applicable.

### Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP Investigating and Responding to COVID-19 Cases.

### COVID-19 investigation, review and hazard correction

In addition to our CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
  - Leave policies
  - COVID-19 testing
  - o Insufficient outdoor air
  - Insufficient air filtration
  - Lack of physical distancing

#### Updating the review:

- Every thirty days during the pandemic
- In response to new information or to new or previously unrecognized COVID-19 hazards.
- When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.

- Improving air filtration.
- o Increasing physical distancing as much as possible.
- Respiratory protection.

### Notifications to the local health department

- Immediately, but no longer than 24 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

### Additional Consideration #2

### **Major COVID-19 Outbreaks**

This section applies to the Morgan Hill USD should the workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

#### **COVID-19 testing**

We will provide regular information about COVID-19 testing to all employees, with specific notices going out to those present at an exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria, and any relevant local health department orders.

### Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP Investigating and Responding to COVID-19 Cases and comply with Santa Clara County Public Health reporting guidelines for schools.

#### **COVID-19 hazard correction**

In addition to the requirements of our CPP Correction of COVID-19 Hazards, we will take the following actions:

· In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum

Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.

- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

### Notifications to the local health department

We will comply with the requirements of our Multiple COVID-19 Infections and COVID-19 Outbreaks-Notifications to the Local Health Department.

### Additional Consideration #3

### **COVID-19 Prevention in Student Provided Transportation to and from campus**

#### Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

#### Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP Physical Distancing and Face Coverings are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the
  operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any
  passengers are provided and wear a face covering in the vehicle as required by our CPP Face
  Coverings.

### Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

### Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

#### Ventilation

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

### Hand hygiene

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.