



The Girls' Middle School

The Girls' Middle School COVID-19 Prevention Program (CPP)

Approved December 2020

The information contained in this document follows the guidelines provided by GMS legal counsel, Leibert, Cassidy, Whitmore, at the time of writing and adoption.

THE GIRLS' MIDDLE SCHOOL
COVID-19 PREVENTION PROGRAM (CPP)

I. PURPOSE

The purpose of the The Girls' Middle School's COVID-19 Prevention Program (CPP) is to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the School from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

II. SCOPE

This CPP applies to all School employees and vendors.

III. DEFINITIONS

For the purposes of the CPP, the following definitions shall apply:

“COVID-19” means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

“COVID-19 case” means a person who either: (1) Has a positive “COVID-19 test” as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a “COVID-19 case” when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

“Close contact COVID-19 exposure” means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” as defined here. This definition applies regardless of the use of face coverings.

“COVID-19 hazard” means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet

nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches that are new or not explained by another reason; (6) headache that is new or not explained by another reason; (7) loss of taste or smell that is new or not explained by another reason; (8) sore throat that is new or not explained by another reason; or (9) nausea, vomiting, or diarrhea that is new or not explained by another reason, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes, openings, or vents, which covers the nose and mouth.

“High-risk exposure period” means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

IV. PROGRAM

A. SYSTEM FOR COMMUNICATING WITH SCHOOL EMPLOYEES

1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at School Worksites and Facilities

The School's policy requires that employees immediately report to the Chief Business Officer, Elise DeYoung (edeyoung@girlsms.org) any of the following: (1) the employee's presentation of COVID-19 symptoms; (2) the employee's possible COVID-19 close contact exposures; and (3) a positive COVID-19 test result. Employees unable to report to the Chief Business Officer should report to Director of Facilities, Simone Hedinger (shedinger@girlsms.org). The School's policy requires that employees immediately report to Director of Facilities, Simone Hedinger (shedinger@girlsms.org) possible COVID-19 hazards at the School's worksites or facilities.

The School will not discriminate or retaliate against any employee who makes such a report.

2. Accommodations Process for Employees at Increased Risk of Severe COVID-19 Illness

The School's policy is to provide an accommodation request process for employees who can demonstrate that they are or may be at higher risk of severe illness from COVID-19.

The CDC identifies the following individuals as being at an increased risk of severe COVID-19 illness, as set forth in the CDC website:

<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html>.

School employees are encouraged to review the list of medical conditions and other conditions and factors identified by the CDC as placing an individual at increased risk of severe illness from COVID-19.

To request an accommodation under the School's policy, please follow the process outlined in [Appendix A: GMS Policies and Protocols for the Accommodation of Employees Who Are at High-Risk for Severe Illness from COVID-19](#) or reach out to the Human Resources Manager, Tammy Patton (tpatton@girlsms.org) for additional information.

3. COVID-19 Testing

The School will require that employees who report to work at School worksites or facilities be tested for COVID-19 regularly, as directed by the School. Testing regularity will be determined by an employees work assignment, the opening status of the school, the availability of testing, and the current state of community spread of the virus and will be communicated via email. Employees will submit the results of this testing to GMS through a secure, confidential portal.

Where the School requires that employees be tested, the School will inform employees for the reason that testing is required, which include reducing the likelihood of the COVID-19 virus being brought onto campus and assisting employees in monitoring their own health status.

The School will also inform employees of the possible consequences of a positive COVID-19 test, which will include, but is not limited to, a requirement that the employee not report for work at the School during the high-risk exposure period and satisfying the minimum quarantine criteria to return to work, as defined in Section IV.K.

When the School requires testing, the School has adopted policies and procedures that ensure the confidentiality of employee information. Specifically, the School will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

4. COVID-19 Hazards

The School will notify its employees and vendors of any potential COVID-19 exposure at a School worksite or facility where a COVID-19 case and employee were present on the same day.

The School will notify employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

The School will also notify employees of cleaning and disinfecting measures the School is undertaking in order to ensure the health and safety of the worksite or facility where the potential exposure occurred.

B. IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS AT SCHOOL WORKSITES AND FACILITIES

1. Screening Employees for COVID-19 Symptoms

The School has adopted screening protocols, which require that employees self-screen for COVID-19 symptoms. Employees acknowledge that GMS staff may conduct additional physical and visual screenings upon entry to the worksite and facility and may be asked to return home based on those findings.

School policy provides that employees will self-screen daily for COVID-19 symptoms prior to reporting to any worksite or facility.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms during a self-screen, the School's screening tool will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work, as set forth in Section IV.K.

If applicable, the Human Resources Manager will advise the employee of any leaves to which they may be entitled during this self-quarantine period.

Further, the School has adopted policies and procedures that ensure the confidentiality of employees and compliance with the CMIA. Specifically, the School will not disclose to other employees, except for those who need to know, the fact that the employee is experiencing symptoms associated with COVID-19.

3. The School's Response to COVID-19 Cases

In the event that a School employee tests positive for COVID-19 or is diagnosed with COVID-19 by a healthcare provider, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work set forth in Section IV.K.

The School's Human Resources Manager, will coordinate with the employee to utilize any leaves to which the employee may be entitled during this self-isolation period.

The School will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) the local health department; (2) Cal/OSHA; (3) employees who were present on the School's worksite or facility when the COVID-19 case was present; (4) the vendors whose employees were present at the School's worksite or facility; and (5) the School's workers' compensation plan administrator.

If possible, the School will interview the COVID-19 case in order to ascertain the nature and circumstances of any contact that the employee may have had with other employees during the high-risk exposure period. If the School determines that there were any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work set forth in Section IV.K.

The School has adopted policies and procedures that ensure the confidentiality of employees and compliance with the CMIA. Specifically, the School will not disclose to other employees, except for those who need to know, the fact that the employee tested positive for or was diagnosed with COVID-19. Further, the School will keep confidential all personal identifying information of COVID-19 cases or persons unless expressly authorized by the employee to disclose such information or as other permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The School conducted a workplace-specific assessment of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the School identified places and times when employees and individuals congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

As part of this process, the School identified potential workplace exposure to all persons at School worksites and facilities, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The School considered how employees and other persons enter, leave, and travel through School worksites and facilities, in addition to addressing employees' fixed workspaces or workstations.

As part of this process, the School treated all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.

Documentation of the School's assessment is available in [Appendix B: Workplace-Specific Identification of Hazards](#).

5. Maximization of Outdoor Air and Air Filtration

For indoor areas of the School's worksites and facilities, the School evaluated how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the worksites and facilities' existing ventilation systems.

The HVAC system has been updated with a MERV-13 filters in addition to already existing carbon filters. Each classroom is equipped with an HEPA filter air filtration system. The back doors are propped open during school hours and large drum fans have been placed to draw out air to create more air flow indoors.

6. Compliance with Applicable State and Local Health Orders

The School monitors applicable orders and guidance from the State of California and Santa Clara County Public Health related to COVID-19 hazards and prevention, including information of general application and information specific to the School's location and operations.

The School fully and faithfully complies with all applicable orders and guidance from the State of California and Santa Clara County Public Health.

7. Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls

The School will evaluate existing COVID-19 prevention controls at the workplace and assess whether there is a need for different and/or additional controls on a periodic basis. Evaluations occur following any public health order or mandatory directive from the State of California, Santa Clara County, or Cal/OSHA. In the absence of new public health guidance, evaluations of the School's COVID-19 prevention controls will occur quarterly.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment ("PPE").

8. Periodic Inspections

The School will conduct periodic inspections of its worksites and facilities as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the School's COVID-19 policies and procedures. Inspections occur following any public health order or mandatory directive from the State of California, Santa Clara County, or Cal/OSHA. In the absence of new guidance, inspections of the School's worksites and facilities will occur quarterly.

C. INVESTIGATING AND RESPONDING TO COVID-19 CASES AT SCHOOL WORKSITES AND FACILITIES

1. Procedure to Investigate COVID-19 Cases

The School has a procedure for investigating COVID-19 cases in the workplace in compliance with Santa Clara County's COVID-19 Designee program. As provided below, the procedure provides for the following: (1) the verification of COVID-19 case status; (2) receiving information regarding COVID-19 test results; (3) receiving information regarding the presentation of COVID-19 symptoms; and (4) identifying and recording all COVID-19 cases.

See [Appendix C: Santa Clara County Schools COVID Transmission Flowchart 10.7.20](#) for details regarding the recommended procedures outlined for Santa Clara County COVID-19 Designees.

The School's assigned Designee to Santa Clara County Public Health is Chief Business Officer, Elise DeYoung (edeyoung@girlsms.org). Director of Facilities, Simone Hedinger (shedinger@girlsms.org) is the School's alternate should the Designee be unable to perform the duties.

2. Response to COVID-19 Cases

As provided above at Section IV.B.3., in the event that an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work set forth in Section IV.K.

The School's responsibilities to respond to COVID-19 cases, as determined by Santa Clara County Public Health, are outlined in [Appendix C: Santa Clara County Schools COVID Transmission Flowchart 10.7.20](#).

a. Contact Tracing

If possible, the School will interview the COVID-19 case in order to ascertain the following information: (1) the date on which the employee tested positive, if asymptomatic, or the date on which the employee first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 cases recent work history, including the day and time they were last present at a School worksite or facility; and (3) the nature and circumstances of the COVID-19 case's contact with other employees during the high-risk exposure period, including whether there was any close contact COVID-19 exposure.

If the School determines that there were any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work set forth in Section IV.K.

For more information about the School's role in contact tracing, see [Appendix D: Santa Clara County Contact Tracing Responsibilities 10.7.20](#).

b. Reporting the Potential Exposure to Other Employees

The School will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) employees who were present at a School worksite or facility when the COVID-19 case was present; and (2) employees of vendors who were present at the School worksite or facility.

See [Appendix E: Sample Communications to Employees and/or Vendors Reporting Potential Exposure](#), and specifically links to the multiple scenario "Template Letters," for examples of communications that would be sent to employees who were present at the School worksite or facility and (if applicable) vendor employees who were present at the School worksite or facility when the COVID-19 case was present.

c. Free COVID-19 Testing for Close Contact Exposures

The School will ensure that COVID-19 testing is available at no cost to all employees who had potential close contact COVID-19 exposure at a School worksite or facility. Testing in Santa Clara County is currently free; if that accommodation changes, and employee insurance plans do not offer free testing, then employees will be eligible for reimbursement of reasonable expenses related to testing.

d. Leave and Compensation Benefits for Close Contact Exposures

The School's Human Resources Manager will provide employees with information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act (FFCRA), Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the School's own leave policies, and leave guaranteed by contract. The School will report this exposure to their Worker's Compensation Claims Administrator within three business days.

The School will continue to provide and will maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job.

The School may require that these employees use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

e. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure

The School will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

3. Confidential Medical Information

The School will protect the confidentiality of the COVID-19 case, and will not disclose to other employees, except for those who need to know, the fact that the employee tested positive for or was diagnosed with COVID-19.

The School will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employee to disclose such information or as otherwise permitted or required under the law.

D. CORRECTION OF COVID-19 HAZARDS AT SCHOOL WORKSITES AND FACILITIES

The School will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to the identification and evaluation of COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This also includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

Employees may report unsafe or unhealthy conditions, work practices, policies, and procedures to Director of Facilities, Simone Hedinger (shedinger@girlsmsg.org).

E. TRAINING AND INSTRUCTION OF EMPLOYEES

The training materials made available to employees can be found in [Appendix F: GMS Social Distancing Protocol Training](#).

1. COVID-19 Symptoms

The School provides employees training and instruction on the COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches that are new or not explained by another reason; (6) headache that is new or not explained by another reason; (7) loss of taste or smell that is new or not explained by another reason; (8) sore throat that is new or not explained by another reason; or (9) nausea, vomiting, or diarrhea that is new or not explained by another reason, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

The School monitors and adheres to guidance by the CDC, California Department of Public Health, and Santa Clara County Public Health concerning COVID-19 symptoms, including as provided at the following web addresses:

<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

<https://www.sccgov.org/sites/covid19/Documents/ReopeningofSantaClaraCountyK12Schools.pdf>

The School will advise employees in the event that these agencies make any changes to their guidance concerning such symptoms.

The School provides employees instruction on the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.

2. School's COVID-19 Policies and Procedures

The School provides regular updates to employees on the School's policies and procedures to prevent COVID-19 hazards at School worksites and facilities and to protect School employees. Employees can report a suspected COVID-19 hazard to Director of Facilities, Simone Hedinger (shedinger@girlsms.org).

3. COVID-19 Related Benefits

The School advised employees of the leaves to which they may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor

Code sections 3212.86 through 3212.88, the School's own leave policies, and leave guaranteed by contract.

Further, when an employee requires leave or is directed not to report to work by the School, the School will advise the employee of the leaves to which the employee may be entitled for that specific reason.

4. Spread and Transmission of the Virus that Causes COVID-19

The School advised employees that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may have no symptoms.

The School further advised employees of the fact that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including hand washing, in order to be effective.

5. Methods and Importance of Physical Distancing, Face Coverings, and Hand Hygiene

The School advised employees of the methods and importance of physical distancing, face coverings, and hand hygiene, including hand washing.

Specifically, the School trained and instructed employees on 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.

Further, the School trained and instructed employees on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment.

F. PHYSICAL DISTANCING

The School requires that all employees be separated from other persons by at least six (6) feet, except where the School can demonstrate that six (6) feet of separation is not possible and where there is momentary exposure while persons are in movement.

The School has adopted several methods by which it increases physical distancing including, but not limited to, the following: (1) providing employees the opportunity to telework or engage in other remote work arrangements; (2) reducing the number of persons in an area at one time, including visitors; (3) posting visual cues such as signs and floor markings to indicate where employees and others should be located or their

direction and path of travel; (4) adopting staggered arrival, departure, work, and break times; and (5) adjusting work processes or procedures to allow greater distance between employees.

When it is not possible for employees to maintain a distance of at least six (6) feet, the School requires individuals to be as far apart as possible.

G. FACE COVERINGS

1. Face Covering Requirement

The School provides face coverings to employees and requires that such face coverings are worn by employees and individuals at School worksites and facilities. Employees may also wear their own face covering provided that it adheres to the CDPH Guidance for the Use of Face Coverings referenced below.

School policy adheres to orders and guidance provided by the CDPH and the local health department, including as provided at the following web address:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

The School's policy on the use of face coverings ensures that they are worn over the nose and mouth when indoors, when outdoors and less than six (6) feet away from another person, and where required by orders from the CDPH or local health department.

The School's policy requires that face coverings are clean and undamaged. The School's policy allows for face shields to be used to supplement, not supplant, face coverings.

The School's policy provides for the following exceptions to the face coverings requirement:

1. When an employee is alone in a room that only they occupy and all doors are closed.
2. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside.
3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders (8 C.C.R. 5144 is available at the following web address: <https://www.dir.ca.gov/title8/5144.html>).

2. Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement

The School's policy requires that employees who are exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it. All employees on site must wear a face covering that prevents the exchange of airborne particles. Hearing impaired individuals will be accommodated through the School's provision of alternative communication devices.

3. Work from Home Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative

The School's policy requires that any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall work from home.

The School does not use COVID-19 testing as an alternative to face coverings or any other preventative measures, such as physical distancing, hand washing, or frequent sanitizing of surfaces.

4. Prohibition on Preventing Employees from Wearing Face Covering

The School does not prevent any employee from wearing a face covering when wearing a face covering is not required by this section, unless not wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

5. Communication to Non-Employees Regarding Face Covering Requirement

The School posts signage to inform non-employees that the School requires the use of face coverings by all visitors at School worksites and facilities.

6. Policies to Reduce COVID-19 Hazards Originating from Persons Not Wearing Face Coverings

The School has developed COVID-19 policies and procedures to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public, by denying access to School worksites and facilities. The School provides disposable face coverings to any employee or visitor requiring one.

These policies include requiring that employees and non-employees wear face coverings at School worksites and facilities, employees wear face coverings at other

times, providing face coverings for employees/visitors not wearing a face covering, denying access to School worksites or facilities for anyone refusing to wear a face covering, and observe proper hand hygiene.

Information provided to employees regarding methods and importance of physical distancing, face coverings, and hand hygiene can be found in [Appendix F: GMS Social Distancing Protocol Training](#).

H. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Installation of Solid Partitions Between Workstations Where Physical Distancing is Not Possible

At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the employer shall install cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.

The School's work spaces are placed at least 6' from one another. Each employee workspace in offices and in classrooms is equipped with clear acrylic partitions to reduce aerosol transmission between the employee and other persons.

2. Maximization of Outdoor Air

As provided above at Section IV.B.5., for indoor School worksites and facilities, the School has evaluated how to maximize the quantity of outdoor air.

Doors are propped open during hours of operation and fans placed as such to pull air out of the building.

The School's HVAC has been serviced and a MERV-13 filter has been installed in addition to the carbon filter. Furthermore, each classroom is equipped with an IQAir Cleanzone SL unit that includes a HEPA filter aimed to eliminate bacteria, viruses, and allergens from the indoor air. Each shared work space is equipped with an IQAir HealthPro aimed to eliminate bacteria, viruses, and allergens from the indoor air.

Further, for School worksites and facilities with mechanical or natural ventilation, or both, the School has maximized the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency ("EPA") Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

3. Cleaning and Disinfecting Procedures

The School's cleaning and disinfecting policy requires the following:

1. Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The School will inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
2. Prohibiting the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing will be minimized and such items and equipment shall be disinfected between uses by different people. Sharing of School vehicles will be minimized to the extent feasible, and high touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) shall be disinfected between users.[1]
3. Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

Further, the School requires that cleaning and disinfecting must be done in a manner that does not create a hazard to employees or vendors.

Additional site-specific details about the School's cleaning and disinfecting procedures can be found in [Appendix G: GMS Cleaning and Disinfecting Procedures](#).

4. Evaluation of Handwashing Facilities

In order to protect employees, the School evaluated its handwashing facilities in order to determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

The School has installed additional hand washing stations at the entrance to the school building. The School requires all employees to wash their hands with soap and water for at least 20 seconds at the following times:

- upon arrival
- prior to and after eating
- after using the restroom
- at dismissal time

Hand sanitizing is an option in the situations listed above only if hand washing is not available or practical. The School has installed wall mounted touchless hand sanitizer dispensers in each classroom and throughout the building in common areas. The School does not provide hand sanitizers with methyl alcohol.

5. Personal Protective Equipment (PPE)

The School's policy provides for PPE. Disposable masks, cloth masks, face shields, and disposable gloves are available for any employee who needs them. The PPE is available on a table outside on the turf during school hours and inside the main doors after school hours or when instruction is all remote.

The School evaluates the need for PPE, such as gloves, goggles, and face shields, to prevent exposure to COVID-19 hazards and provide such PPE as needed. The School inventories the PPE supplies on a regular basis and restocks on an as-needed basis. Bodysuits, N95 masks, and goggles are available if needed in an acute situation to prevent exposure to COVID-19 hazards. Additional PPE supplies are stored in the health center (previously the music room).

In accordance with applicable law, the School evaluates the need for respiratory protection when the physical distancing requirements, as provided herein, are not feasible or are not maintained.

In accordance with applicable law, the School will provide and ensure use of respirators in accordance when deemed necessary by Cal/OSHA through the Issuance of Order to Take Special Action.

In accordance with applicable law, the School will provide and ensure use of eye protection and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Information provided to employees regarding other engineering controls, administrative controls, and personal protective equipment (PPE) can be found in [Appendix F: GMS Social Distancing Protocol Training](#).

I. REPORTING, RECORDKEEPING, AND ACCESS

1. Reporting COVID-19 Cases to the Local Health Department

In accordance with applicable law, the School will report information about COVID-19 cases at the workplace to the local health department. Chief Business Officer, Elise DeYoung (edeyoung@girlsmsg.org), is the School's official Designee and liaison to Santa Clara County Public Health.

Further, the School will provide any related information requested by the local health department. Information regarding COVID-19 symptoms, exposure, positive test results, close contacts, or contact tracing that must be reported to Santa Clara County Public Health is outlined in [Appendix C: Santa Clara County Schools COVID Transmission Flowchart 10.7.20](#).

The COVID-19 Designee is responsible for identifying and reporting school-based Cases and Close Contacts to the county’s “Education Portal” within four hours of notification of a student or employee testing positive.

2. Reporting Serious COVID-19 Illnesses and Deaths to Cal/OSHA

In accordance with applicable law, the School will immediately report to Cal/OSHA any serious COVID-19-related illnesses or deaths of employees occurring at a School worksite or facility or in connection with any employment.

Further, in accordance with applicable law, the school will record any serious work-related COVID-19-related illnesses or deaths.

3. Maintenance of Records Related to the Adoption of the CPP

In accordance with applicable law, the School will maintain records of the steps taken to implement this CPP.

Initial development of the CPP was undertaken by Elise DeYoung (Chief Business Officer) Tammy Patton (Human Resources Manager), Simone Hedinger (Facilities Director), and Marjorie Lucks (Director of Special Projects) in early December 2020. Implementation of many aspects of the CPP were already in place at the time of writing, as the School is in compliance with applicable guidance and directives issued by the California Department of Public Health and Santa Clara County Public Health.

The CPP was reviewed and adopted by Laura Reeve, Elise DeYoung, Tammy Patton, Simone Hedinger, and Anna Hannan on December 16, 2020.

When changes are made to the School’s protocols, employees will be notified via email.

When changes are made to this COVID-19 Prevention Program document, they will be highlighted via Appendix K: Change Log for The Girls’ Middle School COVID-19 Prevention Program, found at the end of this document.

4. Availability of the CPP for Inspection

The School will make this written CPP available to employees on the School’s Staff Portal (staffportal.girlsms.org). Employee organizations at School worksites or facilities

and vendors may request access to this written CPP from Director of Facilities, Simone Hedinger (shedinger@girlsms.org).

Further, the School will make this written CPP available to Cal/OSHA representatives immediately upon request.

5. Records Related to COVID-19 Cases

The School will keep a record of and track all COVID-19 cases with the following information: (1) employee's name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.

In accordance with the Confidentiality of Medical Information Act ("CMIA") and applicable law, the School will keep the employees' medical information confidential.

In accordance with the CMIA and applicable law, the School will make this information available to employees with personal identifying information removed. The School will also make this information available as otherwise required by law. [Appendix H: GMS Worksite COVID-19 Case Reporting](#) contains a record of positive COVID-19 cases reported by employees working on site.

J. EXCLUSION OF COVID-19 CASES

1. Exclusion of COVID-19 Cases from School Worksites and Facilities

The School will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria provided for in Section IV.K. Additionally, COVID-19 cases will be encouraged to stay in close communication with their healthcare professional and will be provided with Santa Clara County Public Health Home Isolation and Quarantine Guidance, available in Appendix F.

2. Exclusion of Employees with Close Contact COVID-19 Exposures from School Worksites and Facilities

The School will exclude employees with close contact COVID-19 exposure from the workplace for 14 days after the last known close contact COVID-19 exposure. Additionally, employees with known close contact with a COVID-19 case will be encouraged to stay in close communication with their healthcare professional and will be provided with [Appendix I: Santa Clara County Home Isolation and Quarantine Guidelines](#).

3. Provision of Benefits to Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure

a. Employees Who Are Able to Telework During Isolation or Quarantine Period

The School will allow employees who are able to telework, and are able and available to work, to telework during the isolation or quarantine period. The School will provide these employees their normal compensation for the work that they perform for the School during the isolation or quarantine period.

b. Employees Who Are Unable to Telework During Isolation or Quarantine Period

The provision of benefits described below does not apply to either: (1) School employees who the School can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) School employees who are unable to work for reasons other than protecting employees and non-employees at School worksites and facilities from possible COVID-19 transmission. Such employees may still use paid time off for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.

For other employees, the School will allow employees who are unable to telework, but are otherwise able and available to work, to use paid time off in order to receive compensation during the isolation or quarantine period. The School may provide such employees who are unable to telework, but who do not have any paid time off available, {to use paid time off not yet accrued } paid administrative leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the School will maintain the employee's seniority and all other employee rights and benefits, including the employee's right to their former job status, during the isolation or quarantine period.

The School may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation. The School will review and update these provisions in accordance with changing laws and regulations.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable laws or School policies that provide employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the School will provide the excluded employee the information on benefits to which the employee may be entitled under applicable federal, state, or local laws.

This includes but is not limited to any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the School's own leave policies, and leave guaranteed by contract.

K. RETURN TO WORK CRITERIA

1. Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases

School policy requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any School worksite or facility until they satisfy each of the following conditions:

1. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
2. COVID-19 symptoms have improved; and
3. At least 10 days have passed since COVID-19 symptoms first appeared.

Minimum criteria to return to work for symptomatic cases are also outlined by Santa Clara County Public Health and available in [Appendix J: Santa Clara County Test Result Decision Tree](#).

2. Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases

School policy requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any School worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

Minimum criteria to return to work for asymptomatic COVID-19 cases are also outlined by Santa Clara County Public Health and available in [Appendix J: Santa Clara County Test Result Decision Tree](#).

3. COVID-19 Testing Not Required in Order to Return to Work

In accordance with CDC guidance concerning symptom-based strategies for the discontinuation of isolation, the School does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

4. Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official

If an employee is subject to an isolation or quarantine order issued by a state or local health official, School policy requires that the employee not report to any School worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

5. Allowance by Cal/OSHA for an Employee to Return to Work

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety.

In such cases, the School will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the School worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.

Appendices

[Appendix A: GMS Policies and Protocols for the Accommodation of Employees Who Are at High-Risk for Severe Illness from COVID-19](#)

[Appendix B: Workplace-Specific Identification of Hazards](#)

[Appendix C: Santa Clara County Schools COVID Transmission Flowchart 10.7.20](#)

[Appendix D: Santa Clara County Contact Tracing Responsibilities 10.7.20](#)

[Appendix E: Sample Communications to Employees and/or Vendors Reporting Potential Exposure](#) (see multiple scenario “Template Letters”)

[Appendix F: GMS Social Distancing Protocol Training](#)

[Appendix G: GMS Cleaning and Disinfecting Procedures](#)

[Appendix H: GMS Worksite COVID-19 Case Reporting](#)

[Appendix I: Santa Clara County Home Isolation and Quarantine Guidelines](#)

[Appendix J: Santa Clara County Test Result Decision Tree](#)

Appendix K: Change Log for The Girls’ Middle School COVID-19 Prevention Program (see next page)

Appendix K: Change Log for The Girls' Middle School COVID-19 Prevention Program

section number	date of change	description of change