

# COVID-19 Prevention Program (CPP)

## Belmont Oaks Academy

**Date: January 29, 2021**

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

### **Authority and Responsibility**

**Executive Director, Jennifer Khoury**, has 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.

### Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by reporting any potential hazard or threat immediately to the School's Covid-19 Point Person, Jennifer Khoury, executive Director.

### Employee screening

The School is currently contracting out for employee testing, contact tracing and self-screening services through Kyla.com:

- Kyla app monitors staff symptoms and vitals **daily** including temperature and weekly to collect information about employee's possible exposure to COVID outside the workplace.
- Prior to work each day, every employee is alerted through the app to report temperature and any symptoms they may be experiencing.
- If symptoms are present, the employee receives a doctor's consult right from the app.
- If doctor suspects COVID, they refer employee to a KYLA mobile COVID clinic for immediate testing.
- Additionally, the app does contact tracing and notifies possible infected employees to get tested.

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 severity of the hazard will be assessed, and correction time frames assigned, accordingly by the School's Maintenance Director, Dennis Reams. Notification and follow-up measures taken to ensure timely correction will be reported immediately to Executive Director, Jennifer Khoury.

## 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:

- Recess and outdoor activities are staggered so that each cohort is assigned to a specific play area for the week. Cohorts will not combine at any time.
- Staggered arrival, departure, work, and break times for students and staff.
- Closing all common areas such as staff lounges and shared indoor break spaces.
- With small numbers of students per cohort, student desks are spaced as far apart as possible with a minimum of 6 ft. distance between and all student and staff desks are equipped with acrylic desk shields as an added barrier of protection.
- Students will eat all snacks and lunch at their desk.
- When student masks are off for eating or drinking, teachers will be at their desk behind their desk shield.
- All K-5<sup>th</sup> grade students must use the designated drop-off and pick-up zones at their designated times.
- Parents and caregivers are to always remain in their car.
- All students and staff are to maintain a 6 ft. distance while moving around campus and in all common areas such as hallways and walkways.
- During the time of Covid-19, until further notice, only students and staff will be allowed to enter buildings and classrooms.
- Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.
- Reference section 3205(c)(6) for details

### 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. If an employee witnesses another employee not abiding by the School's face covering policies, they shall report information to the COVID19 Point Person, Jennifer Khoury at [jennifer@mmboa.org](mailto:jennifer@mmboa.org) or EXT 48.

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

- When an employee is alone in a room.
- While eating and drinking indoors, provided employees are at least six feet apart and outside air supply to the area has been maximized to the greatest extent possible.
- While eating or drinking outside, provided employees are at least six feet apart.
- 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.

### Engineering controls

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. Prior to the opening of the school each day, maintenance staff turn on facility fans, HVAC units, air purifiers and opens windows and classroom doors.

- Consistent throughout our campus buildings and classrooms are MERV 13 or 16 filters for HVAC and/or filtration systems. These filters filter out of the air the following: pollen, dust, dust mites, mold, bacteria, smoke, smog, AND virus carriers.
- In addition, each classroom will be equipped with a GermGuardian 4in1 Air Purifying System as an additional component of air cleaning.

## COVID-19 Air Quality Policies

Regarding COVID-19, MMBOA follows the guidance of the [SMCPHD](#) and the [CDC](#) who emphasize the importance of circulating fresh, outdoor air, as well as using filtration systems. The school's HVAC filters have MERV16 filters. Each classroom has fans along with air purifiers with HEPA filters and UV light sanitizers. From the CDC: ensure ventilation systems operate properly *and* increase circulation of outdoor air as much as possible, for example by opening windows and doors. [California state](#) guidance tells us to use opportunities to reduce time spent indoors by bringing children outside as much as possible.

We monitor the Air Quality Index (AQI) throughout the day using ratings and descriptions from the [EPA](#) to inform our decisions regarding whether to keep the school open, stay indoors, go outside with low impact play, or play freely.

MMBOA is also part of a network of air quality sensors hosted by PurpleAir and has its own one near campus. You can see the sensor [HERE](#). These sensors are updated more frequently than the EPA sensors, which allows us to assess local air quality trends around our campus in a timelier fashion. On smoky days we convert the purple air AQI, using the Lane Regional Air Protection Agency (LRAPA) formula, to get more accurate and current readings. The LRAPA can be enabled on the Purpleair readings on their website. Please see this [article](#) to understand how we use information from both the EPA and the Purpleair network.

With all this in mind, MMBOA will use the following guidelines :

- **Very Unhealthy** -- (**purple zone >200**): School will be closed. MMBOA will remain closed until the EPA AQI is predicted to drop into the orange zone.
- **Unhealthy** (**red zone >150**): If this is forecast by the EPA for the following day, **school will be closed**. We will remain closed until the EPA AQI is predicted to be in the orange zone. If both the EPA and Purpleair (LRAPA enabled) AQI are above 150 for at least 15 minutes during the school day, the doors and windows will be closed and students kept indoors. Parents will be notified via email and can choose to pick up their students early during specific pick-up windows only\*.
- **Unhealthy for sensitive groups** (**orange zone >100**): The windows and doors will remain open and students can go outside for 15 to 30 minutes, but activities will be low-impact
- **Moderate** (**yellow zone >50**): Outside activities are ok; teachers will monitor children
- **Good** (**green zone**): All outside activities ok!

Please note that if we have a sudden and very dramatic change in air quality in the morning and it increases quickly into the red or purple zone during the school day, the campus will close for the day.

## Cleaning and disinfecting

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

### Shared tools, equipment and personal protective equipment (PPE)

The School stocks quantities of individual PPE that is not shared such as disposable face masks and gloves and readily available and distributed to each classroom, office space or work area.

Desktop phones are not to be shared. Classroom intercom phones should only be used by one teacher. In the event the phone must be used by another teacher, the teacher is to use a Clorox wipe to disinfect the phone prior to use and after.

Classroom shared surfaces such as counters or worktables are to be wiped or sprayed with disinfectant that is supplied in each room by the teacher prior to each use. All classrooms are fogged daily, mid-day with Hypochlorous Acid. All bathrooms, doors, doorknobs, handrails, etc. are disinfected mid-day by the maintenance staff. Each night the janitorial staff wipe and disinfect all flat surfaces and areas that are used each day such as bathrooms, doors, handrails, etc.

All classroom materials that are shared such as books, toys, computers, etc. are disinfected after each use either by the teacher or maintenance staff. All playground structures and toys are disinfected in between each classroom cycle and or stable group.

### **Cleaning and Disinfection:**

- Teachers and on-site maintenance staff will be cleaning and sanitizing all common use and high touch areas multiple times daily (manipulatives, door knobs, light switches, sink handles, counter and desk tops, desks, chairs, cubbies, etc.).
- All bathrooms will be cleaned mid-day as usual (floors, sinks, toilets, dispensers, handles, etc.).
  - Cleaning products used according to the directions on label and in accordance with disinfectant on EPA's list of products that are affective against coronavirus.
  - Cleaning materials are stored out of reach of children and proper ventilation is ensured when using these products.
- Cleaning of the entire campus will be conducted by our janitorial service at the end of the day when students and staff have gone home.
- A deep clean/sanitization will be conducted by our janitorial service between Group A and Group B days on campus (students' desks, chairs, countertops, all high touch areas, bathrooms and play structures)

### **Daily Campus Cleaning/Sanitizing (Maintenance Department):**

- 6:00 am - Clean and sanitize outdoor equipment.
- 11:00 am - Sanitization of all high touch areas (doorknobs, light switches, handrails gates, etc.).
- 12:45 pm – Clean and sanitize all restrooms (toilets, countertops, sinks, fixtures, dispensers, doorknobs, light switches and floors).

### **Nightly Janitorial Service:**

- Vacuum/mop all floor areas.
- Empty and sanitize trash, recycle, and compost bins.
- Sanitization of all high touch areas (doorknobs, light switches, handrails gates, etc.)
- Classroom sanitization of chairs, desks, table, and counter tops, sinks, fixtures and dispensers.
- Clean and sanitize all restrooms (toilets, countertops, sinks, fixtures, dispensers, doorknobs, light switches, and floors).
- Creation and successful implementation of drop-off and pick-up procedures.
- Creation and Implementation of schoolwide health and safety policies during the time of Covid-19.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, the following has been implemented:

- All students and staff Students will be instructed to wash their hands multiple times throughout the day for at least 20 seconds each time (upon arrival to their classroom, prior to snacks and lunch, returning to classroom from P.E. and/or recess, and prior to leaving campus for the day).
- Each Elementary classroom has its own sink, touchless soap, and hand sanitizer dispensers.
- Touchless hand sanitizing stations placed at entrances to buildings.
- Hand sanitizer used is Ethyl Alcohol based.

- Multiple “Healthy Habits” time slots have been allocated to each class schedule throughout the day to allow for scheduled handwashing throughout the academic day.

### **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. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

- **Maintenance staff wear NIOSH Approved respirators while fogging the facility.**

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

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

## **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:

- Employees should report COVID-19 symptoms and/or potential hazards to the School’s designated COVID 19 Point Person, Jennifer Khoury at [jennifer@mmboa.org](mailto:jennifer@mmboa.org) or EXT 48.
- All employees are free to 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.
- Monthly COVID 19 testing provided on-site during work hours. The School assumes all costs for monthly on-site testing through KYLA.
- 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.
- 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 will be immediately communicated to our employees via email.

## **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:
  - 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.

### **Staff Training:**

- All faculty and staff participated in a “Return to Work and Covid-19 Informational and Safety Training” Zoom meeting prior to returning to campus for classroom set-up and in-service days. Topics covered as follows:
  - The School’s rules and policies around on-campus operations with respect to Covid-19 as detailed in this plan and waiver request.
  - Effective implementation and knowledge of the Four Pillars in efforts to significantly reduce community spread within the School so that in-person learning can be sustained with integrity.
  - Provided notices for the following:
    - Social Distancing
    - Cough Etiquette
    - Symptoms of Coronavirus
    - Cleaning for Covid-19
    - Payroll timekeeping sheets and staff daily health screening questionnaire
    - Infectious Disease Control Policy – all faculty and staff to sign copy and return
    - Employee rights, paid sick leave and expanded family and medical leave due to Covid-19 related illness
  - Arrival to work and student pick-up and drop-off procedures for faculty and staff.
  - Mask requirements and hygiene protocols.
  - Daily School and classroom cleaning including expectations for faculty and staff.
  - Staff room limitations and outside break areas for faculty and staff
  - Office needs for copying and supplies; faculty and staff not permitted in main office. Each class will have a designated copy and supply box placed outside of main door for copying and supply needs.
  - Technology platform training for Google Classroom, Classkick, etc.

**Appendix D: COVID-19 Training Roster** will be used to document this training.

### **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 for 14 days 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 have demonstrated that the COVID-19 exposure is work related. This will be accomplished by the following:
  - Each employee has been provided the Employee Rights Notice along with the Notice is posted throughout the school. If an employee is diagnosed with Covid-19 they will be provided the DWC-1 Worker’s Compensation Claim Form and the EDD’s DE 2320 information. The school

reports all Covid-19 positive employee cases per CA SB 1159 to the Worker's Compensation Carrier.

- Providing employees at the time of exclusion with information on available benefits.

### Communication Plans:

- The School maintains a database with email addresses, home and mobile telephone numbers, home address of parents as well as emergency contacts.
- Every Thursday, schoolwide updates and information regarding important dates, events and activities is delivered via email to parents/guardians and staff via email. These emails are also available archived on the School website under the Parent Portal section.
- Following the guidance of the Pandemic Recovery Framework, the School will take the following actions accordingly:

**Confirmed Case:** (A case refers to a person who tests positive.)

- Communicate with the School community that a confirmed Case has been identified and outline the actions being taken.
- In consultation with the San Mateo County Health Department, determine necessity to close the entire campus or certain areas of the campus for a prescribed amount of time.
- Take immediate action to sanitize and disinfect the School property impacted by the case.

**Confirmed Contact:** (A contact refers to a person who has come in close contact with a case.)

- Notify the School immediately and remain away from campus.
- Consult with San Mateo County Health Department.
- Take immediate action to sanitize and disinfect the School property impacted by the contact.
- Communicate with our school community that a confirmed contact has been identified and outline the actions being taken.
- Per the County Health guidelines, self-quarantine at home for 14 days.

**Suspected Contacts to Contact:** (Contacts to Contact are people who may have been in proximity to a contact.)

- Any member of our school community (students, family members and staff), who suspect that they may be identified as a Contact to a Contact, must notify the School immediately.
- MMBOA Administration will gather necessary information to determine whether a 14 day quarantine will be required before returning to school.

## **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.
    - 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 School will continue to take direction and lead from San Mateo County Health Department.
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Name: Jennifer Khoury  
*Jennifer Khoury*

Title: Executive Director  
Date: January 29, 2021

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## Appendix B: COVID-19 Inspections

[This form is only intended to get you started. Review the information available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/) for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
<b>Administrative</b>			
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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

## 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:** [enter date]

**Name of person conducting the investigation:** [enter name(s)]

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

**Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):**

<b>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:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

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

## Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

## Additional Consideration #1

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

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section [3205.1](#) 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 COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
  - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
  - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
  - We will provide additional 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:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - 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.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

#### **Notifications to the local health department**

- Immediately, but no longer than 48 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.

## Major COVID-19 Outbreaks

**[This section will need to be added to your CPP should your 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 twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our 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**.

### 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 Employer-Provided Housing**

N/A – Belmont Oaks Academy does not have Employer-Provided Housing.

## **Additional Consideration #4**

### **COVID-19 Prevention in Employer-Provided Transportation to and from Work**

N/A – Belmont Oaks Academy does not have Employer-Provided Transportation to and from work.