

**West Covina Unified School District  
COVID-19 Prevention Program**

**January 2021**

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This COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

**Date:** January 2021

## **AUTHORITY AND RESPONSIBILITY**

Michael Seaman – Assistant Superintendent of Human Resources 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 and their authorized employee representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying direct supervisor.

### **Employee Screening**

We screen our employees by having them self-screen according to the CDPH guidelines. Ensure face coverings are used during screening by both screeners and employees, and if temperatures are measured, non-contact thermometers are used.

## **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 severity of the hazard will be assessed and correction time frames assigned accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

## **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:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements
- Reducing the number of persons in an area at one time, including visitors
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel
- Staggered arrival, departure, work, and break times
- Adjusted work processes or procedures to allow greater distance between employees

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; 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. Face coverings are provided to all employees. Should one encounter non-employees not wearing a face covering one will be provided.

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 at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.



- 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.

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.

### Engineering Controls

For situations where we cannot maintain at least six feet between individuals: Solid partitions are installed where needed.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by ensuring ventilation systems are properly working and adjusted.

### Cleaning and Disinfecting

We clean and disinfect all frequently touched surfaces daily and make available additional cleaning supplies to all employees throughout the work day.

Should we have a COVID-19 case in our workplace an outside service will be used to disinfect all exposed areas.

### Shared Tools, Equipment and Personal Protective Equipment (PPE)

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must not be shared, to the extent feasible. If items are shared, employees are directed to disinfect the item immediately following 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:

- Providing employees with an effective hand sanitizer and prohibiting hand sanitizers that contain methanol (i.e., methyl alcohol)
- Encouraging employees to wash their hands for at least 20 seconds each time

## 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 and Appendix D: Potential COVID-19 Exposure Contact Tracing.

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

- Informed of where there is available COVID-19 testing at no cost during their working hours
- The information on benefits described in Training and Instruction and Exclusion of COVID-19 Cases, below, will be provided to them

## **SYSTEM FOR COMMUNICATING**

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

- Employees should report COVID-19 symptoms and possible hazards to their supervisor or Human Resources department at 626-939-4600.
- That employees can report symptoms and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness may request reasonable accommodations.
- Employees of potential exposure will receive communication of available testing sites.
- 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, contractors and individuals in contact with our workplace) may be exposed to may be communicated through daily emails, trainings, and district policy and procedures.



## **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.

## **ISOLATION OF COVID-19 CASES AND QUARANTINE OF CLOSE CONTACTS**

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

- Ensuring COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding all 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've demonstrated that the COVID-19 exposure is work related. This will be accomplished by:
  - Allowing them to work remotely when they can fulfill their duties from home
  - If determined COVID-19 exposure, related filing of worker's compensation claim will commence.
- Providing employees at the time of exclusion with information on available benefits.

## REPORTING, RECORD KEEPING, 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, to authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Appendix C: Investigating COVID-19 Cases information will be used to keep a record of and track all COVID-19 cases.
- Appendix D: Potential COVID-19 Exposure Contact Tracing information will be used to keep a record of and track all close contacts of COVID-19 cases.

## RETURN-TO-WORK CRITERIA

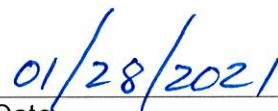
- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 10 days have passed since COVID-19 symptoms first appeared or positive test results.
  - COVID-19 symptoms have improved.
  - COVID-19 case has not had a fever of 100.4 or higher without the use of fever-reducing medications for at least 24 hours just prior to return to work
- 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.

Assistant Superintendent of Human Resources

Title of owner or top management representative



Signature



Date



## APPENDICES

**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: \_\_\_\_\_

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

Date: \_\_\_\_\_

Name of person conducting the inspection: \_\_\_\_\_

Work location evaluated: \_\_\_\_\_

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			
<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			
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:** \_\_\_\_\_

COVID-19 Case Investigation Information			
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):	
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>		
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:	
	Names of employees that were notified:	
Was local health department notified?		Date:

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

## Appendix D: Potential COVID-19 Exposure Contact Tracing

Name/Title of Person Being Traced: \_\_\_\_\_

Date Form was Completed: \_\_\_\_\_

Date I was within 6 feet (with or without a mask) of this person	Duration (Total number of minutes during a 24-hour period)	Name/Title of the Person Involved	Location/Task Where Contact was Made



## Appendix E: Definitions

COVID-19	Coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)
COVID-19 Case	<p>A person who:</p> <ol style="list-style-type: none"><li>(1) Has a positive “COVID-19 test” as defined in Section 3205</li><li>(2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or</li><li>(3) Has died due to COVID-19, in determination of a local health department or per inclusion in the COVID-19 statistics of a county.</li></ol> <p>A person is no longer a “COVID-19 case” in this section 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.</p>
COVID-19 Exposure	Being within 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” defined by this section. This applies regardless of the use of face coverings.
COVID-19 Hazard	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(s) exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on a person 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	Fever of 100.4 degrees Fahrenheit or higher, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, nausea or vomiting, or diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

COVID-19 Test	<p>A viral test for SARS-CoV-2 that is:</p> <ul style="list-style-type: none"> <li>(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</li> <li>(2) Administered in accordance with the FDA approval or FDA Emergency Use Authorization as applicable.</li> </ul>
Exposed Workplace	<p>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, waiting areas. The exposed workplace does not include buildings or facilities not entered by COVID-19 case.</p> <p>Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of COVID-19 case as defined by Labor Code Section 6409.6(d)(5), which states:</p> <p>“Worksite” means the building, store, facility, agricultural field, or other location where a worker worked during the infectious period. It does not apply to buildings, floors, or other locations of the employer that a qualified individual did not enter. In multiworksite environment, the employer need only notify (per AB685) employees who were at the same worksite as the qualified individual.</p>
Face Covering	<p>A tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.</p>
High-Risk Exposure Period	<p>The following time period:</p> <ul style="list-style-type: none"> <li>(1) For persons who develop COVID-19 symptoms: from 2 days before they first develop symptoms until 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</li> <li>(2) For persons who test positive who never develop COVID-19 symptoms: for 2 days before until 10 days after the specimen for their first positive test for COVID-19 was collected.</li> </ul>

## **ADDITIONAL CONSIDERATIONS**

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

This section of the 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 recommend COVID-19 testing to all employees in our exposed workplace.

#### **Isolation and Quarantine of COVID-19 cases**

We will ensure COVID-19 cases and employees who had COVID-19 exposure are isolated and quarantined in the workplace according to our CPP and local health officer orders if applicable.

#### **Investigation of workplace COVID-19 illness**

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

#### **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.



**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 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.