

COVID-19 Campus Safety Plan (CSP)

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COVID-19 Prevention Program (CPP)

Statement of Authority and Responsibility: The Director of Finance and Operations 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 that employees receive answers to questions about the program in a language which they understand and are comfortable using to communicate.

In addition, all employees are responsible for using safe practices, following all directives, policies, procedures, and protocols, and assisting in the maintenance of a safe work environment.

Date Reviewed: January 15, 2021



I. <u>PURPOSE:</u>

The purpose of the 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 except for employees who are teleworking.

III. <u>DEFINITIONS:</u>

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; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) 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" 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 or openings, 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 their supervisor or to the Health Administrator/School Nurse or Director of Finance and Operations any of the following: (1) the employee's presentation of COVID-19 symptoms; (2) the employee's possible COVID-19 close contact exposures; (3) 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. <u>Accommodations Process for Employees at Increased Risk of</u> Severe COVID-19 Illness

The School's policy is to provide an accommodation 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, employees may make a request with their supervisor or the Director of Finance and Operations. Once requested by an employee, the School will engage in an iterative process with the employee to discuss the efficacy and reasonableness of possible accommodations.

3. COVID-19 Testing

The School may require that employees who report to work at School worksites or facilities be tested for COVID-19.

Where the School requires that employees be tested, the School will inform employees for the reason that testing is required.

The School will also inform employees of the possible consequences of a positive COVID-19 test, which may 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 criteria to return to work, as defined in Section IV.K.

Where the School requires testing, the School has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act ("CMIA"). 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 other permitted or required under the law.

Current practice is for the School to test weekly to screen for asymptomatic or presymptomatic cases, in order to exclude cases that might otherwise contribute to inschool transmission. Testing is done under the supervision of our Health Administrator who regularly informs employees of the scheduled test dates, proper procedures for testing, and any other testing related issues. All on-site employees are tested under this program. Employees are not required to test through the School, but, if tested elsewhere, must present proof of a negative test result to work on site.

4. COVID-19 Hazards

The School will notify employees and employers of subcontracted employees 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. <u>Screening Employees for COVID-19 Symptoms</u>

The School has adopted screening procedures, which include the use of a health screening protocol (RUVNA) for COVID-19 symptoms which must be completed daily prior to coming to campus. This protocol screens for all COVID-19 symptoms and requires a temperature check for an employee to be cleared to report to the campus.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms either through the RUVNA health assessment or direct communication with a supervisor or other School administrator, 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, as set forth in Section IV.K.

The School 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 will advise the employee of any leaves to which they 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 employee organizations that represent employees at the School worksite or facility; (5) the employers of subcontracted employees who were present at the School's worksite or facility; and (6) 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 has conducted and continues to conduct regular workplace-specific assessments 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 might 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 and designed specific protocols and procedures to mitigate or eliminate these exposures.

As part of this process, the School also identified potential workplace exposure to all other persons at School worksites and facilities, including employees of other entities, members of the public, customers or clients, and independent contractors. The School considered how employees and these other persons enter, leave, and travel through School worksites and facilities and, in response, re-designed traffic flows and facilities use.

Finally, the School addressed possible exposures in or around employees' fixed workspaces or workstations by staggering work hours, adding partitions, and encouraging remote work.

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

5. <u>Maximization of Outdoor Air and Air Filtration</u>

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. In all cases where upgraded filtration could be implemented and sterilization technologies added to the School's systems, the School made those changes. The School tests these systems regularly and continually investigates possible upgrades and modifications to its systems to improve air exchange and filtration.

6. Compliance with Applicable State and Local Health Orders

The School monitors applicable orders and guidance from the State of California and the local health department 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 the local health department. To ensure such compliance, the School regularly notifies its key personnel of any significant or relevant changes to these orders to ensure that its program evolves and remains in compliance.

7. <u>Evaluation of Existing COVID-19 Prevention Controls and</u> Adoption of Additional Controls

Periodically, 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.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, sanitary options (hand washing stations), 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.

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. 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.

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.

3. 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.

Contact tracing will be the primary responsibility of the Health Administrator.

4. 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) subcontracted employees who were present at the School worksite or facility.

5. Free COVID-19 Testing for Close Contact Exposures

The School will provide COVID-19 testing at no cost to employees during their working hours to all employees who had potential close contact COVID-19 exposure at a School worksite or facility. This testing will be administered by our Health Administrator.

6. <u>Leave and Compensation Benefits for Close Contact Exposures</u>

The School will provide these 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 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.

7. <u>Investigation to Determine Whether Workplace Conditions</u> <u>Contributed to COVID-19 Exposure</u>

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 based on that investigation, make any changes necessary to mitigate exposure to COVID-19 hazards.

8. 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 (who will only be identified as an "individual in the cohort or community") 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 in writing 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, sanitary facilities, administrative controls, and personal protective equipment (PPE).

E. TRAINING AND INSTRUCTION OF EMPLOYEES

1. <u>COVID-19 Symptoms</u>

The School provided 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; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, 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 concerning COVID-19 symptoms, including as provided at the following web address: https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html

The School will advise employees in the event that the CDC makes any changes to its guidance concerning such symptoms.

The School provided employees instruction on the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms. This instruction is emphasized in regular communications with all employees.

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. These updates are provided through remote meetings, School wide e-mails, and a continuously updated FAQ documents available to all employees on the school's local network.

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 of the 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. This advice is repeated at regular intervals in multiple communications to employees.

5. <u>Methods and Importance of Physical Distancing, Face</u> <u>Coverings, and Hand Hygiene</u>

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, and distributing six foot long sticks throughout the campus to illustrate the appropriate physical distance at all times; (4) adopting staggered arrival,

departure, work, and break times; and (5) adjusting work processes or procedures, such as reducing production speed, 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 of various types and sizes to employees and requires that such face coverings are worn by employees and individuals at School worksites and facilities.

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, and not supplant face coverings.

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

- **a.** When an employee is alone in a room.
- **b.** While eating and drinking at the workplace, provided employees are at least six (6) feet apart with outside air supply to the area, and if indoors, has been maximized to the extent possible.
- c. 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).
- **d.** 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.
- e. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which

such tasks are actually being performed, and the unmasked employee shall be at least six (6) feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

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.

3. Physical Distancing Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative

The School's policy requires that all employees wear face coverings. If an employee is exempted from wearing a face covering due to reasons defined in sections 3, 4 and 5 above, the employee shall work only outside and be at least six (6) feet apart from all other persons.

4. <u>Prohibition on Preventing Employees from Wearing Face Covering</u>

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

5. <u>Communication to Non-Employees Regarding Face Covering</u> Requirement

The School posts signage to inform non-employees that the School requires the use of face coverings at School worksites and facilities. All non-employees are met by an employee informing them of this requirement and offering face coverings if needed.

6. <u>Policies to Reduce COVID-19 Hazards Originating from</u> 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.

These policies include requiring that employees and non-employees wear face coverings at School worksites and facilities, employees wear face coverings at other times, maintain physical distance from persons not wearing a face covering, and observe proper hand hygiene.

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

1. <u>Installation of Solid Partitions Between Workstations Where</u> 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 has installed cleanable solid partitions that effectively 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 evaluated how to maximize the quantity of outdoor 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:

- a. 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.
- b. 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, seat belt buckles, armrests, shifter, etc.) shall be disinfected between users.
- **c.** Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

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

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, replace, where possible, high contact fixtures with contactless fixtures, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

The School encourages employees to wash their hands for at least 20 seconds each time through the use of regular communications and posted visual aids.

The School does not provide hand sanitizers with methyl alcohol.

5. Personal Protective Equipment (PPE)

The School's policy provides for PPE.

The School evaluates the need for PPE, such as gloves, goggles, and face shields, to prevent exposure to COVID-19 hazards and provides such PPE as needed. The School has a protocol for employees to utilize an on-line system to request supplemental PPE whenever needed.

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.

I. REPORTING, RECORDKEEPING AND ACCESS

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

In accordance with applicable law and any relevant public health guidance, the School will report information about COVID-19 cases in the workplace to the local health department.

Further, the School will provide any related information requested by the local health department.

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 related activity.

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.

4. Availability of the CPP for Inspection

The School will make this written CPP available to employees and employee organizations at School worksites or facilities and will post it on its website.

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 and employee organizations with personal identifying information removed. The School will also make this information available as otherwise required by law.exclusion of covid-19 cases

1. <u>Exclusion of COVID-19 Cases from School Worksites and Facilities</u>

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.

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

As advised in the most recent guidance from the SBCPHD, the School will exclude employees with close contact COVID-19 exposure from the workplace for 10 days after the last known close contact COVID-19 exposure.

- 3. Provision of Benefits to those 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 sick leave for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.

For other employees, the School will require that employees who are unable to telework, but are otherwise able and available to work, use paid sick leave in order to receive compensation during the isolation or quarantine period. School employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The School may provide such employees who are unable to telework, but who do not have any paid sick leave available, 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 or reinstituted), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

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

The obligations set forth in this section do not limit any other applicable law, School policy, or collective bargaining agreement that provides employees with greater protections or benefits.

5. <u>Provision of Information Concerning Benefits to Excluded</u> <u>Employees</u>

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 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, any applicable local requirements, the School's own leave policies, and leave guaranteed by contract.

J. RETURN TO WORK CRITERIA

1. <u>Minimum Criteria to Return to Work for Symptomatic COVID-19</u> 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.

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.

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

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 10 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.

COVID-19 School Guidance Checklist





January 14, 2021

Date: January 22, 2021

COVID-19 School Guidance Checklist

Name of Local Educational Agency or Equivalent: Crane Country Day School

Number of schools: 1

Enrollment: 234

Superintendent (or equivalent) Name: Joel Weiss

Address: 1795 San Leandro Lane, Phone Number: 8059697732

Santa Barbara, CA 93108 Email: jweiss@craneschool.org

Date of proposed reopening: Opened

by waiver on October 1

Type of LEA: Private Grade Level (check all that

County: Santa Barbara apply): K 1st 2nd 2nd 1

Current Tier: Purple 3rd 4th 5th 6th

(please indicate Purple, Red, Orange or Yellow) 7th ✓8th ✓

This form and any applicable attachments should be posted publicly on the website of the local educational agency (or equivalent) prior to reopening or if an LEA or equivalent has already opened for in-person instruction. For those in the Purple Tier, materials must additionally be submitted to your local health officer (LHO), local County Office of Education, and the State School Safety Team prior to reopening.

The email address for submission to the State School Safety for All Team for LEAs in Purple Tier is:

K12csp@cdph.ca.gov

LEAs or equivalent in Counties with a case rate >=25/100,000 individuals can submit materials but cannot re-open a school until the county is below 25 cases per 100,000 (adjusted rate) for 5 consecutive days.

For Local Educational Agencies (LEAs or equivalent) in ALL TIERS:

☐ I, Joel Weiss, Head of School, post to the website of the local educational agency (or equivalent) the COVID Safety Plan, which consists of two elements: the COVID-19 Prevention Program (CPP), pursuant to CalOSHA requirements, and this CDPH COVID-19 Guidance Checklist and accompanying documents, which satisfies requirements for the safe reopening of schools per CDPH Guidance on Schools. For those seeking to open while in the Purple Tier, these plans have also been submitted to the local health officer (LHO) and the State School Safety Team.

I confirm that reopening plan(s) address the following, consistent with guidance from the California Department of Public Health and the local health department:

□ Stable group structures (where applicable): How students and staff will be kept in stable groups with fixed membership that stay together for all activities (e.g., instruction, lunch, recess) and minimize/avoid contact with other groups or individuals who are not part of the stable group.

Please provide specific information regarding:

How many students and staff will be in each planned stable, group structure? (If planning more than one type of group, what is the minimum and maximum number of students and staff in the groups?)

Each grade will be considered a distinct stable group and will be broken into smaller sub-groups who attend core classes together with typically a maximum of 16 students. The actual number may fluctuate based on parental choice as to whether their child engages in on-campus vs remote learning within a given quarter. In the event that parental choice creates a stable larger group than 16, alternative spaces will be considered to maintain appropriate distance between students. Classrooms are reserved for the stable group teachers and students when classes are in session and for cleaning staff only after hours.

If you have departmentalized classes, how will you organize staff and students in stable groups?

We do not have departmentalized classes.

If you have electives, how will you prevent or minimize in-person contact for members of different stable groups?

Each stable group (grade) will have the same 3-4 specialist teachers (art, music, Spanish, Library, P.E., science, engineering, drama) per quarter. These stable groups do not mix with stable groups from any other grade for these electives. Classes are held outdoors in dedicated locations that have been modified to support instruction or indoors in a designated space for the stable group only or, finally, by electronic means to mitigate contact and offer consistent instruction. In the case of indoor instruction, students are at their desks, in physically distanced seating arrangements, behind Plexiglas shields, and always wearing a mask. Teachers follow the same practices.

☐ Entrance, Egress, and Movement Within the School: How movement of students, staff, and parents will be managed to avoid close contact and/or mixing of cohorts.
With 11 acres of space, Crane has ample room to maintain safe social distancing outside during all activities and movement between activities.
Parents are not allowed on campus but rather remain in their cars when dropping of students and picking up students at the end of the day. Walkways are marked with directional arrows to ensure that traffic flows in consistent directions and with adequate distancing. Schedules are staggered so stable groups do not overlap.
Finally, stable groups wear color coded wristbands to easily distinguish between groups and further ensure separation.
Admissions tours of the campus are done virtually in some cases or happen during non-school hours when students are not present on campus.
□ Face Coverings and Other Essential Protective Gear: How CDPH's face covering requirements will be satisfied and enforced for staff and students.
Below please see Crane's policy for wearing face coverings on campus. This policy is posted in several locations on campus and has been shared with staff and families in multiple communications. Each classroom is provided with a supply of face coverings (cloth and surgical as well as adult and children sizes). Staff are

trained to enforce Crane's policy for both students and colleagues. Additionally, CDC and CDPH signage encouraging the use of face coverings is posted throughout the campus. Finally, no students are allowed to leave their vehicle to attend school unless wearing a face covering properly.

Crane School Face Covering Policy:

All Adults on Campus:

must wear a face covering when in the presence of students whether indoors or outdoors.

must wear a face covering when physical distancing of six feet or more is not possible. This requirement applies whether

one is in an enclosed space, a semi-enclosed space, or outdoors. Any possibility that physical distancing can or will not not be maintained requires that a face covering be worn. For instance, if you leave your car and plan to walk through the Main Building or through a narrow hallway to get to your classroom, you should assume you will come into close contact with someone. This possibility requires that you wear a mask at all times.

the only exceptions* are: <u>if a physical distance of six feet or</u> more from others can be maintained and:

- while working outside
- while working at your own workspace or desk
- while eating or drinking

*While these exceptions are consistent with CDC and CDPH mandates, Crane School strongly encourages that face coverings be worn at all times when in the vicinity of other individuals, especially indoors.

All Students/Children on Campus:

must wear a face covering on campus except in monitored situations when physical distancing is maintained

This requirement applies whether one is in an enclosed space, a semi-enclosed space, or outdoors. <u>Any possibility that physical distancing can or will not be maintained requires that a face covering be worn.</u>

(If a face covering is removed temporarily, the student/child/adult should store the face covering in a plastic bag or container and minimize any handling of the face covering.)

☐ **Health Screenings for Students and Staff:** How students and staff will be screened for symptoms of COVID-19 and how ill students or staff will be separated from others and sent home immediately.

Crane uses the RUVNA health assessment which sends an early morning text and email asking the participant several screening questions including whether they have a temperature above 100.4 degrees, are experiencing a new loss of taste and smell, or have any other CDC defined symptoms of COVID-19. After processing a response, the individual is either cleared to come to campus or denied access. (The School has provided families and staff with a Kinsa

thermometer to take the temperature of a student or staff member daily before coming to campus as part of this health assessment). No one will be admitted to campus without completing the RUVNA assessment and being cleared for access. This policy is enforced by senior administrators who monitor the entrance to the school during the day.

If someone is already on campus and experiences any symptoms suggesting illness, that individual will be attended to by our Health Administrator who is an RN. The ill individual will be immediately moved to our Health Services facility for observation and isolation. Once the individual is logged into the facility, either a parent will be called to pick up the student or a staff member will be asked to return home for diagnosis and, if appropriate, quarantine or isolate. This Health Services facility is a tent, separate from any teaching or administrative spaces which abuts our parking lot for easy access.

☐ **Healthy Hygiene Practices:** The availability of handwashing stations and hand sanitizer, and how their safe and appropriate use will be promoted and incorporated into routines for staff and students.

Crane has bathrooms with sinks throughout the campus. K-3 classrooms have sinks in the classrooms. Ten portable hand washing stations with two sinks each (for a total of 20 stations) have been distributed throughout Crane's campus in locations where students either are in school, at play, or eating lunch. The school has also installed a permanent 5-station hand washing station at the school's entrance. Upon arrival, all students are required to wash their hands before heading to their classrooms. This activity is supervised by administrators and teachers. Staff are also required to wash their hands before starting work.

Handwashing is also required before and after eating, after using the bathroom, and after sneezing, coughing, or using tissues. If a sink is not available, students and staff use hand sanitizer which is available in each classroom and workspace throughout the campus. An on-line system for re-ordering hand sanitizer and other disinfecting supplies from our storeroom is available to all staff.

Hygiene practices are emphasized and reinforced through training videos that have been distributed to families and staff, signage which is posted throughout the school, and regular reminders through various communications including weekly messages and assembly announcements.

□ Identification and Tracing of Contacts: Actions that staff will take when there is a confirmed case. Confirm that the school(s) have designated staff persons to support contact tracing, such as creation and submission of lists of exposed students and staff to the local health department and notification of exposed persons. Each school must designate a person for the local health department to contact about COVID-19.

Savannah Aijian, RN, Crane's Health Administrator is the school's designated liaison with the Santa Barbara County Public Health Department. In the event of a confirmed case of COVID-19, she and the school registrar work with School Division heads to contact trace using school attendance records and school census data (siblings, relatives, etc.) to identify any possible close contacts. Ms. Aijian will work with and follow the guidance of the SBCPHD in this process from identification through notification of exposed individuals.

☐ **Physical Distancing:** How space and routines will be arranged to allow for physical distancing of students and staff.

In addition to signage and sandwich boards emphasizing the need for distancing, stickers have been placed on campus walkways and other finished outdoor spaces which demonstrate appropriate distancing.

Classrooms are organized with desks and tables stationed to ensure appropriate physical distancing. In some cases, spaces other than classrooms (library, art rooms) have been re-purposed and classes moved into these spaces to ensure distancing. All classrooms also have been allocated outdoor spaces located throughout our campus which have been modified to allow for classes to be held outside. Teachers are encouraged to hold classes outside whenever possible.

Schedules have been staggered for all activities to ensure minimal overlap of grades and stable groups and create optimal conditions for distancing.

Staff work schedules have also been staggered to minimize the number of staff working in office spaces at the same time. If staff are in the same building, partitions have been built to provide physical barriers between spaces and ensure that no one is working in close proximity to someone else.

Please provide the planned maximum and minimum distance between students in classrooms.

Maximum: In some large classrooms and depending on the number of students in the Stable Group, the distance could be as much as 12 feet.

Minimum: In classrooms, the minimum distance is five to six feet between students. When in class, students are sitting behind plexiglass shields and wearing face coverings at all times. Teachers are also wearing face coverings and standing/sitting behind plexiglass barriers.

☐ Staff Training and Family Education: How staff will be trained and families will be educated on the application and enforcement of the plan.
The staff has attended presentations on our COVID Compliance Procedures and Protocols at various times during the school year. All staff members have viewed videos explaining COVID-19, its transmission, and best mitigation practices. Regular all school communications emphasize and explain our policies with particular attention given to any modifications to our policies and procedures.
Families and students were provided videos which explained COVID-19 and demonstrated the practices necessary to mitigate exposure to the virus including: proper hand washing, maintaining appropriate distance, and using face coverings properly. Families also received a copy of our Re-Entry Plan which described, in detail, all our plans for mitigating exposure to COVID-19 for students attending school on the Crane campus. Families are updated regularly by all school communications on our Procedures and Protocols, particularly when any changes are made based on enhancements we implement and/or changes we make in response to evolving CDC, CDPH, and SBCPHD guidance and mandates. In monthly meetings which are on-line and available to all families, the School reviews its safety practices and solicits input from families on additional ways to mitigate the risks of COVID-19 exposure.
☐ Testing of Staff: How school officials will ensure that students and staff who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic staff testing cadence.
If a staff member has been exposed to COVID-19 or demonstrates symptoms of COVID-19, they will be sent home immediately, encouraged to test, and instructed to adhere to SBCPHD protocols on quarantine and isolation.
If a staff member was exposed at work, we will provide them a free, self administered PCR test (done under our Health Administrator's supervision) before they leave campus. If the staff member is already home when exposure is identified, (and if the individual chooses to do so rather than visit a Public Health or Community site), they may return to the school and be tested in our Health Services facility without entering the core campus or coming into contact with any other individual.
Currently, the school is performing asymptomatic surveillance testing of its entire staff weekly.
☐ Testing of Students: How school officials will ensure that students who

have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic student testing cadence.

If a student has been exposed to COVID-19 or demonstrates symptoms of COVID-19, they will be sent home immediately, encouraged to test, and instructed to adhere to SBCPHD protocols on quarantine and isolation. Any communication relative to an exposure will describe types of tests and where a family may test in the county.

The School is evaluating its options to perform asymptomatic testing of students and, as part of that process, in negotiations with a local medical practice for both testing materials and staffing capacity to conduct such testing.

☐ **Identification and Reporting of Cases:** At all times, reporting of confirmed positive and suspected cases in students, staff and employees will be consistent with <u>Reporting Requirements</u>.

Our Health Administrator is in regular contact with the SBCPHD to ensure that our reporting protocols and practices are in compliance with all requirements.

☐ **Communication Plans:** How the superintendent will communicate with students, staff, and parents about cases and exposures at the school, consistent with privacy requirements such as FERPA and HIPAA.

In the event of a case or exposure at school, students will be advised in person, parents will be notified by phone and written communications (postings and e-mails), while staff will be notified in person, through remote meetings, and by e-mails. (testing, quarantine or isolation).

In all cases, the existence of a case and/or exposure will be noted and the protocols to be followed explained, but no identifying information as to the individual(s) affected will be provided consistent with privacy requirements such as FERPA and HIPAA

Consultation: (For schools not previously open) Please confirm consultation with the following groups
☐ Labor Organization
Name of Organization(s) and Date(s) Consulted: Name:
Date:
□ Parent and Community Organizations
Name of Organization(s) and Date(s) Consulted: Name:
Date:
If no labor organization represents staff at the school, please describe the process for consultation with schoolstaff:
For Local Educational Agencies (LEAs or equivalent) in PURPLE:
□ Local Health Officer Approval: The Local Health Officer, for (state County) County has certified and approved the CRP on this date: If more than 7 business days have passed since the submission without input from the LHO, the CRP shall be deemed approved.