

# COVID-19 Prevention Program (CPP) for Marlborough School

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

**Recently Updated:** March 15, 2021

## Authority and Responsibility

Dr. Priscilla Sands, Head of School, 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.
- Conduct bi-weekly Health and Safety Task Force meetings to identify and discuss potential hazards and solutions.

### Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by providing general training on COVID-related awareness and reporting methods, and by providing general updates from CDPH and LADPH. Additionally, Marlborough has an open-door reporting policy and employees may notify the school of any potential hazards by contacting Matt Riddle, Director of Facilities and Capital Planning, or Cliff Hahn, Human Resources Manager.

### Employee screening

We screen our employees by ensuring all employees, guests, and contractors complete a CDPH approved self-screening questionnaire before their arrival and show proof of eligibility to enter. In addition, our security staff takes a temperature reading of all persons entering the campus via a non-contact forehead reader, confirms proof of the pre-screening questionnaire, and confirms that face coverings are being worn properly at all times. Disposable surgical-grade face coverings are also available at entry points if needed.

## 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 hazard and its severity level will be documented and analyzed by the Director of Facilities and Capital Planning in consultation with the facilities personnel. The Director will identify appropriate corrective measures, including a time frame to correct each hazard. This information will be maintained by Health and Safety Task Force and communicated to School management on a monthly basis to ensure timely correction and appropriate follow-up as needed.

## 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.
- Appropriate signage and visual cues, including floor markings, to indicate where employees and students should be located or their direction and path of travel.
- 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. While most community members bring their own face covering from home, Marlborough School also has available additional face coverings upon request. The School also encourages employees and students to report anyone who is out of compliance with our face-covering protocols directly to the Human Resources Manager or the Director of Facilities and Capital Planning.

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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Click [here](#) for additional guidance and information on face coverings.

### Engineering Controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Plexiglass partitions at main reception desk and at employee lounge tables (eating outside is strongly suggested).

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

- Setting rooftop economizers to a minimum of 30% outside intake; weather conditions permitting.
- Carrying out a robust preventative and responsive maintenance program with in-house and contracted vendors. All findings are documented and repairs, if necessary, are completed within 72 hours.
- Installing Maximum Efficiency Rating Value (MERV) 13-rated air filters on all existing HVAC units. This type of air filtration is the highest possible rated system which is compatible with our existing systems.

### **Cleaning and Disinfecting**

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

- Custodial crews are given ample time at the beginning and end of each day to disinfect all areas of use. Proper supplies are ordered and maintained throughout the shift lead and regional management.
- Personnel using disinfectant foggers are deployed at the end of each workday to address high-touch areas. A non-toxic agent (hypochlorous acid) is used in such areas along with appropriate PPE.
- Updated COVID-specific cleaning protocols are communicated via our COVID-19 Safety Plan (CSP) and their efficacy is discussed regularly in our Campus Health and Safety Task Force meetings.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: per CDPH guidelines, any exposed area(s) will be closed off for a 24 hour period and deep cleaned by an independent contractor who specializes in contained-area cleaning and hazmat removal. Air scrubbing machines will remain in place for 24-48 hours after cleaning.

### **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 also not be shared, to the extent feasible. Where sharing is unavoidable or difficult to discourage, the items will be disinfected and sanitized regularly between uses by assigned custodial crew. In addition, disposable wipes are readily available throughout campus as are disinfectant stations for hand sanitizing.

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:

- Converted regular handwashing sinks to touchless faucets whenever possible.
- Added touchless ADA-compliant mobile handwashing sinks to be assigned at high traffic areas.
- Assigned hand sanitizing stations along hallways and elevator entrances throughout campus.
- Converted science laboratories with multiple handwashing sinks to individual stations and added plexiglass partitions as a precautionary measure.
- Provided each employee with an effective hand sanitizer bottle containing methanol.
- Posted signage throughout campus to encourage employees to wash their hands for at least 20 seconds.

### **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. See section [3205\(c\)\(E\)](#) for additional details.

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

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

1. Upon immediate notification of a positive COVID-19 Case or Symptoms, communication between the designated COVID-19 response team will take place to further discuss the measures and next steps. If the case is identified as on campus, identified or suspected positive case and affected individuals in close contact will be appropriately separated to designated isolation holding space on campus.
2. If affected or potentially affected, the positive COVID-19 case, potentially positive COVID-19 case, close contacts and/or areas are identified, affected parties will be appropriately separated to designated quarantine holding space on campus and facilities management will decipher further cleaning and sterilization steps. Any potential cases, laboratory confirmed cases, and identified close contacts will be sent home and cleared from campus as soon as possible.
3. A meeting to further discuss symptoms, location, contact tracing, close contacts, and last date/time on campus will take place between the Director of Facilities/Capital Planning and the School Nurse/Campus Healthcare Provider, and the identified case or potential case. Immediate separation of the case from the school community to self-isolation at home if notification occurs while the case is on-site is implemented. In the event that self-isolation at home cannot occur in the moment, temporary, on-site isolation of the case will occur if arrangements are needed for the person's return to their home.
4. To further identify person(s) exposed to case(s) at school, and locations of the case, contact tracing utilizing the technology (AUXS, Google Forms) along with information from the close contacts of the identified case will be deciphered by the Director of Facilities/Capital Planning, the School Nurse/Campus Healthcare Provider, and the Human Resources Manager. Such communication will identify COVID-19 testing at no cost for the employee, via testing partnerships at the Los Angeles County Level and further testing partnerships with the school. Parties involved will be separated into three tier groups for further communication from the school with next steps for isolation, quarantine, or community wide memo information respective to their contact with the identified or potentially positive, symptomatic case.
5. Designated Covid-19 Compliance team will be made aware that communication for the case will be sent by the School Nurse/Campus Healthcare Provider.
6. Communication pertinent to their respective tier will go out to affected parties and Marlborough Community Members which includes LA County DPH regulations governing self-isolation and links to sites with further information for access to testing.
7. The School Nurse/Campus Healthcare Provider as designated liaison to DPH will refer information to LA County department of Public Health within 24 hours of case identification or in the event of an outbreak on campus or in the event of a cluster of cases (3 or more cases within 14 days) to the Department of Public Health via email at [ACDC-Education@ph.lacounty.gov](mailto:ACDC-Education@ph.lacounty.gov) or by calling (888) 397-3993 or (213) 240-7821

### Communication Response Tiers and Communications

Tier 0: Confirmed COVID-19 Positive/Suspected Positive Case	Tier 1: Close Contacts of COVID-19 Positive/Suspected Positive Case during Infectious Period	Tier 2: Community at Large
<ul style="list-style-type: none"> <li>• Includes all suspected positive/confirmed positive COVID-19 cases</li> <li>• Sent within 24 hours of case identification</li> <li>• Includes request to follow Home Isolation</li> </ul>	<ul style="list-style-type: none"> <li>• Includes all close contacts (An individual who was within 6 feet of the infected person for more than 15 minutes over a period of 24 hours) of suspected positive/confirmed positive COVID-19 cases 2 days prior</li> </ul>	<ul style="list-style-type: none"> <li>• Includes all community members at large</li> <li>• Includes last date, time, and location of suspected positive/confirmed positive case</li> </ul>

<p>Instructions as set forth by LACDPH and instructions to do so</p> <ul style="list-style-type: none"> <li>Includes awareness of contact by LADPH Case Contact Investigation Program</li> </ul>	<p>to case confirmation (with PCR test) OR 2 days prior to first symptoms</p> <ul style="list-style-type: none"> <li>Includes request to follow Home Quarantine Instructions as set forth by LACDPH and instructions to do so</li> <li>Includes further instruction on Home Isolation if symptoms arise OR a positive COVID-19 test result during this time</li> <li>Includes information for LA County DPH testing sites and access to testing</li> </ul>	<ul style="list-style-type: none"> <li>Includes delineation of case as employee, student or guest</li> <li>Includes notice that all persons with an exposure should get tested, whether they have symptoms or not</li> <li>Includes information for LA County DPH testing sites and access to testing</li> <li>Includes next steps/cleaning measures and protocols</li> <li>Includes closure notifications of campus or affected areas</li> </ul>
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### Asymptomatic Testing to Identify Potential Exposure to COVID-19

The School will provide PCR testing, free of charge, on site every week to every member of the school community, until further notice. Community members also have the option to have a PCR test done at one of three local off-site locations. The tests are being administered by Covid Testing Today through its partnership with PMH Laboratory, Inc. [Click here for a FAQ sheet](#) by PMH Labs on testing methods and other important information about test results.

### 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 possible hazards to either the School Nurse or the Director of Facilities and Capital Planning.
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees have the option to voluntarily obtain testing through their health care provider or local testing centers, at no cost.
- 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.
- Updates and other changes concerning Covid-19 protocols and procedures are communicated to employees via email and through employee meetings.

## 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.
- Ongoing training and information updates as received from State and County health officials.
- A Community **Health & Safety Pledge** ([click here](#)) that establishes expectations and responsibilities around issues of personal health and safety. By signing the Pledge, every community member (employees, parents, and students) agrees to do his/her/their part to help keep the community safe, and commits to abide by and uphold various safety measures in an effort to help minimize the spread of COVID-19.

**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. See the Human Resources Manager for additional information on employer-provided sick leave benefits.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in

- accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

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

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
    - 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.
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## 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(s) 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(s) 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			
Visible signage present			
<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			
<b>PPE (not shared, available and being worn)</b>			
Gloves			
Face shields/goggles			

## 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(s) conducting the investigation: \_\_\_\_\_

<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 the 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: \_\_\_\_\_

Name of person(s) that conducted the training: \_\_\_\_\_

Employee Name	Signature