



# Town School for Boys COVID-19 Prevention Program (CPP)

Updated August 2021

**I. PURPOSE:**

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.

**I. SCOPE**

This CPP applies to all School employees except for employees who are working remotely.

**II. DEFINITIONS:**

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

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

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

“COVID-19 close contact” 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.

"Exclusion period" means the period that the School excludes an individual from campus due to being considered a COVID-19 Case or having Close contact COVID-19 exposure.

“Exposed group” means all employees at a work location, working area, or a common area at work, where an employee COVID-19 case was present at any time during the high-risk exposure period. A common area at work includes bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. A place where persons momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work. If the COVID-19 case was part of a distinct group of employees who are not present at the workplace at the same time as other employees, for instance a work crew or shift that does not overlap with another work crew or shift, only employees within that distinct group are part of the exposed group. If the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the high-risk exposure period, and all persons were wearing face coverings at the time the COVID-19 case was present, other people at the work location, working area, or common area are not part of the exposed group.

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth. The definition excludes a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

“Fully vaccinated” means at least 14 days prior the employee received the full-dose of the COVID-19 vaccine (either two-doses or single dose).

“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.

“Major outbreak” means twenty (20) or more COVID-19 cases in an “exposed group” within a 30-day period.

“Outbreak” means three (3) or more COVID-19 cases among employees in an “exposed group” within a fourteen (14) day period.

“Respirator” means a device approved by NIOSH to protect the wearer from particulate matter, such as an N95 filtering facepiece respirator.

### III. **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 COVID-19 Liaison 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. **Accommodations Process for Employees at Increased Risk of 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 Head of School.

##### 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 otherwise permitted or required under the law.

The School will provide testing (may be offsite) at no cost to the employee during paid time under the following circumstances: following symptoms in any employee not fully vaccinated; following a “close contact” at the workplace for any employee not fully vaccinated or not themselves COVID-19 cases in the prior 90 days; following a “close contact” at the workplace in a vaccinated employee if they develop symptoms; following an “outbreak” for all employees not fully vaccinated or not themselves COVID-19 cases in the prior 90 days; following a “major outbreak” for all employees regardless of vaccination status.

#### **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. Screening Employees for COVID-19 Symptoms**

The School has adopted screening protocols, which include self-screening by all employees for COVID-19 symptoms.

School policy provides that the School **will** screen employees for COVID-19 symptoms prior to entering worksites and facilities or employees will self-screen for COVID-19 symptoms prior to reporting to any worksite or facility.

## **2. Responding to Employees with COVID-19 Symptoms**

Should an employee present COVID-19 symptoms during a self-screen, the School 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 provide COVID-19 testing free of charge to the employee, which may occur off site, if they are not fully vaccinated.

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; (4) the employers of subcontracted employees who were present at the School's worksite or facility; and (5) the School's workers' compensation plan administrator.

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

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

#### **4. Workplace-Specific Identification of COVID-19 Hazards**

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

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

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

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

#### **5. Maximization of Outdoor Air and Air Filtration**

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

#### **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.

**7. Evaluation of Existing COVID-19 Prevention Controls and 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, administrative controls, and personal protective equipment (“PPE”).

**8. Periodic Inspections**

The School will conduct periodic inspections using the [Covid-19 Inspections Form](#) 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.

**a. Contact Tracing**

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



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

**b. Reporting the Potential Exposure to Other Employees**

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

**c. 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 [within an exposed group](#) at a School worksite or facility, [for all employees not fully vaccinated at the time of potential exposure](#).

**d. Leave and Compensation Benefits for Close Contact Exposures**

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.

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

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

**3. Confidential Medical Information**

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

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

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

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

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

#### **E. TRAINING AND INSTRUCTION OF EMPLOYEES**

##### **1. COVID-19 Symptoms**

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.

##### **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.

### **3. COVID-19 Related Benefits**

The School advised employees of the leaves, pay and benefits to which they may be entitled in its Employee Handbook. Leaves that may be available to employees who are unable to work for reasons related to COVID-19 include Family or Medical Leave, Pregnancy-Related Disability Leave, Workers' Compensation Leave, Discretionary Medical Leave and Personal Leave. The pay and benefits to which employees may be entitled include paid sick leave, paid vacation, State Disability Insurance Benefits (SDI), benefits under the School's long term disability insurance plan, Family Temporary Disability Insurance Benefits (also known as Paid Family Leave or PFL) and workers' compensation benefits. 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. 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.

### **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.

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

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

Specifically, the School trained and instructed employees on the importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.

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

## **F. FACE COVERINGS**

### **1. Face Covering Requirement**

The School provides face coverings to employees and requires that such face coverings are worn by employees and individuals at School worksites and facilities.

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 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:

1. When an employee is alone in a room, unless otherwise specified by the SFDPH.
2. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders (8 C.C.R. 5144 is available at the following web address: <https://www.dir.ca.gov/title8/5144.html>).
4. 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.
5. 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.

Additionally, the School will provide respirators upon request for any employee not fully vaccinated. In a “major outbreak” the School will offer respirators for voluntary use to all employees in the exposed group (regardless of vaccination status). Whenever respirators are provided, the School will provide training on how to properly wear the respirator.

**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 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 (6) feet apart from all other persons unless the unmasked employee is tested at least twice (2x) weekly for COVID-19.

However, the School does not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

**4. Prohibition on Preventing Employees from Wearing Face Covering**

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

**5. Communication to Non-Employees Regarding Face Covering Requirement**

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

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

The School has developed COVID-19 policies and procedures to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public.

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.

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

**1. 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.

**2. Cleaning and Disinfecting Procedures**

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

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

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

**3. Evaluation of Handwashing Facilities**

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

The School encourages employees to wash their hands for at least 20 seconds each time.

The School does not provide hand sanitizers with methyl alcohol.

#### **4. 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 provide such PPE as 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.

### **H. REPORTING, RECORDKEEPING AND ACCESS**

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

In accordance with applicable law, the School will report information about COVID-19 cases at the workplace to the local health department.

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.

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.

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

#### **5. Records Related to COVID-19 Cases**

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

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

In accordance with the CMIA and applicable law, the School will make this information available to employees with personal identifying information removed. The School will also make this information available as otherwise required by law.

##### **I. EXCLUSION OF COVID-19 CASES**

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

The School will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria provided for in Section IV.K.

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

The School will exclude unvaccinated employees with close contact COVID-19 exposure from the workplace for 10-14 days after the last known close contact COVID-19 exposure, [in accordance with the latest guidance from the DPH](#).

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

If an employee is excluded from campus because of a positive COVID-19 test or a diagnosis or as a result of a close contact COVID-19 exposure, the School will provide the employee a notice notifying them of the pay and benefits they will receive during the exclusion period and confirming their right to reinstatement following the exclusion period. Below is a summary of the pay and benefits generally available to employees during an exclusion period.



The School will also provide excluded employees information required by the San Francisco Department of Public Health.

#### **a. Employees Who Telework During Exclusion Period**

Depending on the needs of the School and the nature of an employee's job duties, the School may offer employees the opportunity to telework during an exclusion period. If the School offers an employee telework, the School will provide these employees their normal compensation during the isolation or quarantine period. An employee offered telework who declines telework will not be entitled to pay during their exclusion period.

#### **b. Employees Who Do Not Telework During Exclusion Period**

Employees who are able and available to work but are not offered telework will be entitled to pay and benefits when excluded from work due to close contact COVID-19 exposure. Such pay and benefits will typically be provided up to a maximum of fourteen days. Employees must first use accrued sick leave and may use vacation leave. Once they exhaust all accrued vacation and sick leave, the School will continue their regular pay and benefits during the exclusion period unless (1) the School can demonstrate that their close contact COVID-19 exposure was not work-related; or (2) they are unable to work for reasons other than their exclusion by the School (such as their own illness, family care obligations, vacation or School closure). Employees who are not able to work during an exclusion period due to their own illness may be eligible for State Disability Insurance (SDI) benefits or workers' compensation benefits. Employees who are not able to work during an exclusion period due to family care obligations may be eligible for State Paid Family Leave (PFL) benefits.

### **J. RETURN TO WORK CRITERIA**

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

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

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

#### **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**

The School does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

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

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

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

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

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

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

**Additional Town School Resources:**

The Family Guide to Returning to Town is available on our website at <https://www.townschool.com/about-town/covid-19-response>.

The Employee Guide and Employee Handbook may be accessible via the Portal.