

The Bishop's School COVID-19 Safety Plan (CSP) for In-Person Instruction

Updated: March 14, 2022

The Bishop's School's COVID-19 safety plan consists of three parts:

- (1) The Cal/OSHA COVID-19 Prevention Program (CPP)
- (2) The Bishop's School COVID-19 Policies
- (3) COVID-19 Safety Plan Checklist

COVID-19 Prevention Program (CPP) for The Bishop's School

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur on the Bishop's campus.

Date: March 14, 2022

Authority and Responsibility

Michael Beamer, Assistant Head of School, has overall authority and responsibility for implementing the provisions of this CPP. 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.
- Document the vaccination status of our employees, as required, by using Appendix E: Documentation of Employee COVID-19 Vaccination Status, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our campus.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the 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 the existing COVID-19 prevention controls on our campus and any need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form, as needed, to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by speaking with their supervisor about any questions, concerns, or observations they have about COVID-19 safety. In addition, they may always speak with Michael Beamer about their concerns.

Employee screening

Before coming to campus each morning, all students, families and employees must check for any signs or symptoms of COVID-19. If a student or an employee is experiencing any symptoms, they should plan to get tested for COVID-19 and may not come to campus without first speaking with either their supervisor or School Nurse Susie Fournier (fourniers@bishops.com or 858-875-0742).

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. Hazards will be prioritized based on their severity and the length of time required to correct them. Priority will be given to severe hazards, which pose the greatest risk to members of the community. Depending on the nature of the hazard, Assistant Head of School Michael Beamer, Director of Facilities Brian Williams, or School Nurse Susie Fournier will be responsible for ensuring that the hazard is corrected.

Control of COVID-19 Hazards

Face Coverings

In accordance with the California Department of Public Health guidance, face coverings or masks are strongly recommended while indoors on campus, regardless of an individual's vaccination status. Outdoors, wearing a mask or face covering is optional. Bullying and harassment regarding mask use will not be tolerated and may result in disciplinary action. The School will provide clean, undamaged face coverings to those who request them.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment. Face coverings will also be provided to any employee that requests one, regardless of their vaccination status. If an employee is found not complying with this policy they may face disciplinary action.

Engineering controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency

compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by opening windows and doors, adjusting the intakes in HVAC units, and providing air purifiers in spaces. HVAC units are scheduled to be maintained and adjusted routinely, to ensure that they are in good working order. Medical-grade air purifiers have been added to classrooms and common spaces, and HVAC filters have been upgraded to MERV 13 when possible. If the School experiences a situation where excessive heat or wildfire smoke prevents the natural circulation of fresh air into spaces, the School will consider going to a distance learning model and closing the campus. Michael Beamer and Brian Williams have reviewed the California guidance on ventilation considerations for schools.

Cleaning and disinfecting

The School has implemented the following cleaning and disinfection measures for frequently touched surfaces:

- Additional personnel have been contracted to routinely clean surfaces and bathrooms on campus;
- Adequate cleaning supplies have been procured and time has been given for routine cleaning and sanitizing to happen;
- Employees have been trained on the scope, process and frequency of cleaning and disinfection required.

Hand sanitizing

Good hand hygiene is an easy way to effectively prevent the spread of disease. Washing hands physically removes pathogens and reduces the likelihood for illness within a community. In moments when washing hands with soap and water is not possible, the use of hand sanitizer that contains at least 60 percent alcohol is a safe and effective way to slow disease spread. All community members should wash their hands at the beginning of the day, before and after meals, after using the restroom, and after coughing or sneezing. Individuals should use a tissue to wipe their nose and to cough or sneeze into a tissue or into their elbow.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

The School will continue to evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and will provide such PPE as needed. Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person.

Testing of symptomatic employees

We make COVID-19 testing available at no cost to employees with COVID-19 symptoms and to those employees who have been exposed to the virus. Testing is performed during employees' paid working time.

Investigating and Responding to COVID-19 Cases

Investigating and responding to a case on campus will be accomplished by using the form in Appendix C: Investigating COVID-19 Cases. Employees who had potential COVID-19 exposure at Bishop's will be offered COVID-19 testing at no cost during their working hours either on campus or at one of the free San Diego County testing sites. The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

System for Communicating

Our goal is to ensure 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 their supervisor, Asst. Head of School Michael Beamer, or School Nurse Susie Fournier in person, by phone, or by email.
- 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 can be found on our internal school website or through our human resources office.
- Testing is available for school employees. If our testing is not available, testing is available in free sites around San Diego County.
- 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.
- The School will communicate routinely regarding COVID-19, the hazards that employees may face due to COVID-19, and what the School is doing to mitigate any risk of exposure to COVID-19. This communication will happen via email or employee meetings.

Training and Instruction

We have, and will continue to provide, training and instruction that includes:

- the School's 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;
- 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;
- the fact that particles containing the virus can travel more than six feet, especially indoors, so face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination;
- the right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements, specifically how to properly wear them and how to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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;
- the proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since COVID-19 is an airborne disease, high quality masks protect the users from airborne disease, while face coverings primarily protect people around the user. Specifically, the conditions where face coverings must be worn at the workplace, the fact that face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained, and that employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation;
- COVID-19 symptoms, the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms;
- and information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

A training roster will be used to document this training.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

When we have a COVID-19 case or close contact in our workplace, we limit transmission by ensuring that COVID-19 cases are excluded from the workplace until return-to-work requirements are met. Individuals may return to work in accordance with the [decision tree](#) developed by the San Diego County Office of Education, along with the Health and Human Services Agency, Live Well San Diego, the San Diego Academy of Family Physicians, and the American Academy of Pediatrics. Bishop's will consult and follow the guidance from the decision tree when determining when it is safe for a symptomatic individual or an individual who has been exposed to COVID-19 to return to campus. During an absence due to COVID-19, employees may be eligible

for a leave of absence, pursuant to the School's policies. Employees should contact the School's Human Resources office to discuss their options. The School will continue and maintain an employee's earnings, seniority and all other employee rights and benefits whenever it has been demonstrated that the COVID-19 exposure is work-related (this will be accomplished by employer-provided sick leave benefits and/or public benefit programs). Additionally, the School will provide employees at the time of exclusion with information on available benefits.

Reporting, Record keeping, and Access

It is our policy to:

- Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- 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 or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

The San Diego County Office of Education, along with the Health and Human Services Agency, Live Well San Diego, the San Diego Academy of Family Physicians, and the American Academy of Pediatrics have put together a [decision tree](#) to inform schools, students and families when individuals may return to school following an exposure or COVID-19 symptoms. Bishop's will consult and follow the guidance from the decision tree when determining when it is safe for a symptomatic individual or an individual who has been exposed to COVID-19 to return to campus. If an order to isolate, quarantine, or exclude 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.



Michael S. Beamer
Assistant Head of School

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 and eating areas.

Evaluation of potential workplace exposure includes sources from all individuals on campus, including employees, students, parents, vendors, members of the public and independent contractors. The School will consider how employees and other persons enter, leave and travel through campus, in addition to addressing fixed work locations.

Person conducting the evaluation:

Date:

Name(s) of employee and authorized employee representative who 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

(Additional information is available at www.dir.ca.gov/dosh/coronavirus/)

Name of person conducting the inspection:

Date:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Air Purifiers			
Administrative			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			

Gloves			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by the School 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.

Name of person conducting the investigation:

Date:

Case name:		Occupation or Purpose on Campus:	
Locations case was present on campus:		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present on campus:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
Names of potential Contacts who may have been exposed and spaces on campus that require cleaning and disinfection:			

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:

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

Appendix D

[Not used at Bishop's, the School maintains its own training rosters]

Appendix E: Documentation of Employee COVID-19 Vaccination Status
CONFIDENTIAL

[NOTE: this is a sample document: the actual documentation is held as a confidential medical record]

Employee Name	Fully or Partially Vaccinated ¹	Method of Documentation ²

1 Update this chart as needed and maintain as confidential medical record

2 Acceptable options include:

- Employees provide proof of vaccination (vaccine card, image of vaccine card or health care document showing vaccination status) and employer maintains a copy.
- Employees provide proof of vaccination. The employer maintains a record of the employees who presented proof, but not the vaccine record itself.
- Employees self-attest to vaccination status and employer maintains a record of who self-attests.

In the Event of Multiple COVID-19 Infections and COVID-19 Outbreaks

Should the School experience multiple COVID-19 infections or a COVID-19 outbreak, this section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

The School will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours. All employees exposed to COVID-19 on campus will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department. After the first two COVID-19 tests, the School will continue to provide COVID-19 testing to employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period. The School will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

The School will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with state and county guidance and local health officer orders.

Investigation of workplace COVID-19 illness

The School will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP Investigating and Responding to COVID-19 Cases.

COVID-19 investigation, review and hazard correction

In addition to the CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, the School will immediately perform a review of potentially relevant COVID-19 policies, procedures and controls, and implement changes as needed to prevent further spread of COVID-19. The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Leave policies and practices and whether employees are discouraged from remaining home when sick.
 - COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
- The review will be updated:

- Every thirty days the outbreak continues.
- In response to new information or to new or previously unrecognized COVID-19 hazards.
- When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. The School will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Respiratory protection.

Notifications to the local health department

The School will report within 48 hours after learning of three or more COVID-19 cases in our workplace, and we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace. The School will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. The School will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Major COVID-19 Outbreaks

In the event that the School experiences a major COVID-19 outbreak, this section of CPP will stay in effect until there are no new COVID-19 cases detected on our campus for a 14-day period.

COVID-19 testing

The School will provide twice-a-week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

The School will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with state and county guidance and local health officer orders.

Investigation of workplace COVID-19 illnesses

The School will comply with the requirements of our CPP Investigating and Responding to COVID-19 Cases.

COVID-19 hazard correction

In addition to the requirements of our CPP Correction of COVID-19 Hazards, we will take the following actions:

- In buildings or structures with mechanical ventilation, the School will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. The School will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- The School will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- The School will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by Cal/OSHA.