

**Orange Unified School District**

# **COVID-19 Prevention Plan (CPP)**

**CCR Title 8, § 3205**



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# COVID-19 Prevention Program (CPP) for Orange Unified School District

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

**Date: February 15, 2022**

## Authority and Responsibility

The District Superintendent or his/her designee and District Management Team 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 implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- When applicable, document the vaccination status of our employees by using an internal confidential record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- OUSD COVID-19 Safety Plan Case Response procedures are in place 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 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 and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

## Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Reaching Memorandum of Understandings with employee associations covering the reopening of school.
- Communicating directly with their site administrator regarding any potential safety hazards.
- The Reimagining Schools Task force was previously created to provide a forum for input regarding the Districts Safety and Health Driven Reopening Plan prior to the reopening. The

Reimagining Schools Task force included representatives from all employee groups.

### **Employee Screening**

Employees are required to self-screen daily (prior to leaving their home for work) for COVID-19 symptoms See **Appendix C: OUSD Employee Self-Health Daily Check**. In addition, District-wide COVID-19 testing is being conducted on a regular basis.

### **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.

Reports of threats to life, health and safety will be addressed based on the severity of the hazard in accordance with the provisions of the respective Collective Bargaining Agreements and applicable District Policies.

Timely corrections of the above will be mitigated/addressed by the appropriate staff and documented to ensure that proper mitigation measures were taken.

### **Control of COVID-19 Hazards**

#### **Face Coverings**

We provide clean, undamaged 3-ply disposable protective face coverings and ensure they are properly worn by employees that are not fully vaccinated when indoors or in vehicles, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Communication regarding face covering requirements will be generated by the District via email, website, posters, and signage.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- Employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it. If their condition does not permit it, then the employee will be at least six feet apart from all other persons and either fully vaccinated or tested at least weekly for COVID-19.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

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.

## **Engineering Controls**

Along with multiple layers of safety, ventilation has been improved to the extent feasible possible pursuant to identified measures that include increasing the introduction of fresh air (safety and weather permitting), ensuring filtration efficiency for equipment and filters to the highest level compatible with the existing ventilation system as recommended by the California Department of Health Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments as well as Centers for Disease Control and Prevention.

Specifically, OUSD uses Tri Dem filters treated with antimicrobial, which are custom fit to all units to eliminate any unfiltered air passing through our HVAC units. The HVAC units are inspected/serviced when the filters are changed as well. They have a six-month life; however, they are changed more frequently. We follow all the American Society of Heating and Air-Conditioning Engineers standards for air flow. The District continues to assess into additional systems that would reduce the risk of transmission.

## **Cleaning and Disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Outsourcing custodial services as needs arise to support current staff.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

- Clean the areas, material, and equipment used by a COVID-19 case during the high-risk-period, and disinfection if the area, material, and equipment is indoors and will be used by another employee within 24 hours of the COVID-19 case, using EPA approved chemicals proven to eliminate COVID-19.
- Custodial, Maintenance, and Operations Staff are trained by our vendors on the proper use and application of COVID-19 eradication chemicals.
- Where applicable, staff are provided medical clearance and training on the use of N95 masks.

## **Hand Sanitizing**

To implement effective hand sanitizing procedures, we:

- Issued additional portable hand washing stations for all elementary schools and secondary schools based on total population of the site;
- Encourage and allow time for employee handwashing;
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol). Hand sanitizing stations have been added in strategic areas at all sites;
- Provide informative material, verbal encouragement, and visual cues to emphasize employees washing their hands for at least 20 seconds each time.

## **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 section 3380, and provide and ensure use of 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. Please reference the [OUSD Respiratory Protection Program](#) for applicable details.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids. Please reference the Draft [OUSD Aerosol Transmissible Diseases Program](#) for applicable details.

## **Testing of Symptomatic Employees**

COVID-19 testing is offered at no cost to employees with COVID-19 symptoms who are not fully vaccinated, during regular work hours. Additional county testing resources are provided to employees.

## **Investigating and Responding to COVID-19 Cases**

We have developed effective procedure to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by collecting information similar to that identified in **Appendix D: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

- Employees that had a close contact while at work are offered COVID-19 testing at no cost during their working hours, excluding:
  - Employees who were fully vaccinated before the close contact and do not have symptoms.
  - COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees.
- Written notice within 1 business day of knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representatives), independent contractors and other employers at the worksite during the high-risk exposure period.
- We consider a “close contact” that meets the definition as described in section 3205(b)(1) definition; “high-risk exposure period” meets the section 3205(b)(10) definition; and “worksite” meets the section 3205(b)(12) definition.

## **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, possible close contacts, and hazards to their immediate supervisor. Administrators and supervisors will assess the information. Once determination is made that additional guidance or assistance is required; the administrator/supervisor will contact Human Resources or Risk Management for assistance.
- Employees may report symptoms, possible close contacts, and hazards without fear of reprisal.

- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness may request reasonable accommodations to the Human Resources Department.
- Where testing is not required, employees can access COVID-19 testing through District employee COVID-19 testing events and community testing sites hosted through the Orange County Health Care Agency.
- In the event testing is required due to 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.

## Training and Instruction

We provide effective employee training, instruction, and information that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, 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:
  - How to properly wear them.
  - 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.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
  - The conditions where face coverings must be worn at the workplace.
  - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
  - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- 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.

- Training is provided to staff on an online platform, requiring staff to log-in with an individualized identifier. The system provides a series of videos followed by a quiz section. If the employee does not meet the minimum passing grade of 80%, they are required to retake the training. Most videos are available in other languages such as Spanish. The system documents employee trainings and provides weekly reminders of new or missing assignments.
- OUSD is using the Informed K12 platform to provide additional information to staff on COVID-19 guidance such as the use of face coverings, physical distancing, social and emotional wellbeing, and Cal/OSHA regulations.
- See **Appendix E: Required COVID-19 Training and Instructions**

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

Where 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 our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria has been met, with the following exceptions:
  - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms, provided they wear a face covering and maintain six feet of physical distance from others in the workplace for 14 days following the last date of close contact.
  - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the initial onset of COVID-19 symptoms, provided they wear a face covering and maintain six feet of distance from others in the workplace for 14 days following the last date of close contact.
  - COVID-19 cases who returned to work per our return-to-work criteria who never developed COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the first positive test, provided they wear a face covering and maintain six feet of distance from others in the workplace for 14 days following the last date of close contact.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by providing access to all statutory benefits and leaves in which a person may be eligible.
- Providing employees at the time of exclusion with information on available benefits.
- NOTE: Cal/OSHA Emergency Temporary Standards (ETS) were revised effective January 14, 2022. CDPH has since revised its recommended isolation and quarantine times, and these recommendations override the return to work criteria in the revised ETS.

## **Reporting, Recordkeeping, 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 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 information similar to that identified in the **Appendix D: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases.
- The District has created an online COVID-19 Dashboard that identifies confirmed COVID-19 cases on school campuses and at OUSD facilities.

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

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
  - COVID-19 symptoms have improved, and
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- **COVID-19 cases who tested positive but never developed 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 once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met.
- Persons who had a close contact may return to work as follows:
  - Close contact but never developed symptoms: after 14 days have passed since the last known close contact unless either of the following exceptions apply:
    - Ten days have passed since the last known close contact and the person wears a face covering and maintains six feet of physical distance from others while at the workplace for 14 days following the last date of close contact.
    - Seven days have passed since the last known close contact; the person tested negative for COVID-19 using a COVID-19 test with the specimen taken at least five days after the last known close contact; and the person wears a face covering and maintains six feet of physical distance from others while at the workplace for 14 days following the last date of close contact.
  - Close contact with symptoms: when the “COVID-19 cases with symptoms” criteria (above) have been met.
- NOTE: Cal/OSHA Emergency Temporary Standards (ETS) were revised effective January 14, 2022. CDPH has since revised its recommended isolation and quarantine times, and these recommendations override the return to work criteria in the revised ETS.
- 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.





## Appendix B: COVID-19 Inspections

Date: **[enter date]**

Name of person conducting the inspection: **[enter names]**

Work location evaluated: **[enter information]**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
<b>[Add any additional controls your workplace is using]</b>			
<b>Administrative</b>			
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>[Add any additional controls your workplace is using]</b>			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>[Add any additional controls your workplace is using]</b>			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
<b>[Add any additional controls your workplace is using]</b>			
<p>*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize 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 maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.</p>			


# Appendix C: OUSD Employee Self-Health Daily Check

## OUSD Employee Self-Health Daily Check

**Prior to leaving your home for work**, conduct a daily self-health check by screening for a fever and other COVID-19 symptoms.

If you have had close contact with a person who has been diagnosed with COVID-19 (within 6 feet of an infected person for a cumulative total of 15 minutes or more, over a 24-hour period, during their infectious period), are feeling unwell, or are exhibiting any of the symptoms listed below, **do not report to work**. Report your absence to a supervisor. It is advised that you also contact your healthcare provider.

\*Fever or chills      \*Shortness of breath      \*Nausea, vomiting, diarrhea      \*New loss of taste/smell      \*Sore throat  
\*New onset cough      \*Difficulty breathing      \*Fatigue, muscle/body aches      \*Congestion/runny nose      \*Headache

 *If you test positive for COVID-19 report your absence and test result to Human Resources at 714-628-5515 and follow current isolation guidelines. Employee medical information is considered confidential.*

## Appendix D: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

**Date:** [enter date COVID-19 case – suspected/confirmed - became known to the employer]

**Name of person conducting the investigation:** [enter name]

**Name of COVID-19 case (employee or non-employee\*) and contact information:** [enter information]

**Occupation (if non-employee\*, why they were in the workplace):** [enter information]

\*If we are made aware of a non-employee COVID-19 case in our workplace

**Names of employees/representatives involved in the investigation:** [enter information]

**Date investigation was initiated:** [enter information]

**Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed:** [enter information]

**Date and time the COVID-19 case was last present and excluded from the workplace:** [enter information]

**Date of the positive or negative test and/or diagnosis:** [enter information]

**Date the case first had one or more COVID-19 symptoms, if any:** [enter information]

**Information received regarding COVID-19 test results and onset of symptoms (attach documentation):** [enter information]

**Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:**

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
  - They were fully vaccinated before the close contact and do not have symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a Close Contact requirements.
- The names of those exempt from exclusion requirements because:
  - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

[enter information]

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:

1. All employees who were in close contact
2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

**What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?**  
**[enter information]**

**What could be done to reduce exposure to COVID-19?**  
**[enter information]**

**Was local health department notified? Date?**  
**[enter information]**

# Appendix E: Required COVID-19 Training and Instruction

## Cal/OSHA COVID-19 Protection Plan Training

The COVID-19 pandemic has had a massive impact on public health – globally, locally and personally. In California, it's changed nearly every aspect of daily life and work. In late 2020, California approved emergency temporary Cal/OSHA standards on COVID-19 infection prevention. These new temporary standards apply to most workers in California not covered by Cal/OSHA's Aerosol Transmissible Diseases standard. This course provides employees in California with an overview of COVID-19 as well as several methods for prevention required by California law. Topics include: symptoms of COVID-19, methods of physical distancing, requirements for face coverings, methods of hand washing, and procedures for cleaning and disinfecting. Employees need to also refer to their district's specific plan.

## Cal/OSHA COVID 19 Protection Plan Training Supplement

This module contains the Cal/OSHA COVID 19 Protection Plan Training Supplement. The course must be completed in addition to the Cal/OSHA COVID 19 Protection Plan Training course.