

Section 11

Injury and Illness Prevention Program Addendum

Infection Prevention Program

Specific to

COVID-19 Prevention Program

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)).

The following is an Addendum to California Montessori Project's IIPP. California Montessori Project (CMP) is committed to preventing workplace hazards and is adopting this document which has been designed to control exposures in the workplace to COVID-19 which is caused by a novel coronavirus known as SARS-CoV-2 ([severe acute respiratory syndrome coronavirus 2](#)).

Workplace, or "worksites," for the limited purposed of COVID-19 prevention regulations only, means the building, or facility where a COVID-19 case was present during the high-risk exposure period. It does not apply to buildings, floors, or other locations of the employer that a COVID-19 case did not enter, locations where the worker worked by themselves without exposure to other employees, or to a worker's personal residence or alternative work location chosen by the worker when working remotely.

The following document has been designed to conform to Cal/OSHA's requirements, follows the California Department of Public Health guidelines (https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Consolidated_Schools_Guidance.pdf) and mirror the general safety elements found within the IIPP.

Company Policy

CMP is committed to preventing workplace hazards that could result in employee injury and/or illness; and to complying with all applicable state and local occupational health and safety regulations. The following Infection Prevention Program (IPP), specific to COVID-19 has been established and remains effective until withdrawn. This document is designed to ensure affected employees understand COVID-19 in regards to the following:

- Authority and Responsibility
- Employer's Responsibilities
 - COVID-19 Testing
 - ☐ Definition of a COVID-19 Test
 - Vaccination and Documentation
 - ☐ Definition of Fully Vaccinated
- Employee Training
- Procedures to Help Prevent the Spread of COVID-19 in the workplace:

- o Health Screening
- o Health Monitoring
- o Good Sanitation Practices
- o Hand Sanitizing
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- o Limit Non Essential Visits and Travel
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- o Face Coverings
 - Definition – Face Covering
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 - Identification and Evaluation of COVID-19 Hazards (Safety Audit)
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 - Investigating and Responding to COVID-19 Cases
 - Reporting, Recordkeeping, and Access specific to COVID-19
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The CPP applies to all locations where CMP operates and is available for review by any employee.

As more information is disseminated about COVID-19 and workplace practices, this Addendum is subject to sudden change. This living document allows for CMP to continue to provide ever improving safety measures per Center for Disease Control and Prevention (CDC), California Department of Public Health (CDPH), the Sacramento County Department of Health Services, and El Dorado County of Health Department recommendations.

Authority and Responsibility

The Superintendent, Director of Human Resources, Network Safety Coordinator, and Site Administrators have 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.

Employer Responsibilities

CMP follows the measures below while *Shelter in Place*, *Stay at Home*, and/or *Employee Health Monitoring* orders are in effect, as outlined by the federal, state, and local public health department officials. (For California, *Shelter in Place*, *Stay at Home*, and *Employee Health Monitoring* are broad terms encompassing all CDC, state, and local health recommendations and specific state legislative measures including California Senate Bill 1159 and Assembly Bill 685).

CMP has developed a COVID-19 Safety Committee, comprised of representatives from Central Administration and each school site. The Committee has been tasked with maintaining the infectious disease prevention response by providing or coordinating the following policies, procedures, and trainings. They are also tasked with enforcing these policies and staying current with federal, state, and local directives.

CMP:

- Provides employee training on COVID-19 signs, symptoms, and prevention.
- Frequently cleans and disinfects used work surfaces based on current CDC, state, and local health recommendations.
- Provides spacing of employees to support safe social distancing per government guidelines.
- If a mandate exists, requires the use of a face covering per CDC, state, and local health recommendations.
- If a mandate does not exist, encourages face covering per CDC, state, and local health recommendations.
- Considers and, when possible, implements increased workplace ventilation, barriers, and employee work practices that reduce risk.
- Monitors employee symptoms at the beginning of the shift and throughout the work day.
- Identifies, ~~e~~Evaluates and ~~c~~Corrects COVID-19 Hazards.
- In accordance with California SB 1159, reports positive employee COVID-19 PCR (Polymerase Chain Reaction) tests to their workers' compensation insurance carrier.
- Documents all COVID-19 related employee training. (See Appendix A: COVID-19 Training Roster Template, as one possible tool to track the trainings provided).

COVID-19 Testing

Definition of a COVID-19 Test

'COVID-19 test' means a test for SARS-CoV-2 that is:

- a) Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test);
- b) Administered in accordance with the authorized instructions; and

Not both self-administered and self-read unless observed by the employer or an authorized telehealth proctor. Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory (including home or on-site collected specimens which are processed either individually or as pooled specimens), proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by an employer.

COVID-19 Testing at CMP

CMP will continue to make COVID-19 testing ~~available~~ available, on site, at no cost to employees during employees' paid time as follows:

- Symptomatic unvaccinated employees, regardless of whether there is a known exposure.
- All employees regardless of vaccination status, who have had a close contact with a COVID-19 case, except for recently recovered employees.
- All employees except for recently recovered employees, regardless of vaccination status, in an outbreak or a major outbreak
- When following CDPH's Isolation and Quarantine Guidance to keep employees working or return them sooner, if tested.
- ~~—Unvaccinated employees after an exposure.~~
- ~~• Fully vaccinated employees after close contact~~
- ~~• Fully vaccinated employees after an exposure if they develop symptoms.~~
- ~~• Unvaccinated employees in an outbreak.~~
- ~~• All employees in a major outbreak.~~

CMP will provide training on COVID-19 Testing if performed onsite, by a CMP Employee.

CMP must adhere to Cal/OSHA guidelines which require test be observed by a testing agent. CMP will continue to provide testing on site that complies with all of the Cal/OSHA guidelines.

Vaccination and Documentation

Per the Cal/OSHA revised Emergency Temporary Standards (ETS) "...employers have to document that the employees received U.S. Food and Drug Administration-approved vaccines or, for people fully vaccinated outside the U.S., vaccines listed for emergency use by the World Health Organization. This record must be kept confidential." See Appendix B for a template to document employee COVID-19 Vaccination status.

CMP will accept the following as proof of vaccination:

- Employees provide proof of vaccination (vaccine card, image of vaccine card or health care document showing vaccination status) and employer maintains a copy. Note, employees have the right to decline to state if they are vaccinated or not and CMP must treat those employees as unvaccinated and cannot take disciplinary/discriminatory action against them.

CMP will continue to provide updates to the staff community regarding vaccine opportunities in and around the community.

Definition of Fully Vaccinated

'Fully Vaccinated' means the employer has documented:

- a) A person's status two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses in accordance with the approval, authorization, or listing that is:

- 1) Approved or authorized for emergency use by the FDA;
 - 2) Listed for emergency use by the World Health Organization (WHO);
 - 3) Administered as part of a clinical trial at the U.S. site, if the recipient is documented to have primary vaccination with the active (not placebo) COVID-19 vaccine candidate, for which vaccine efficacy has been independently confirmed (e.g., by a data and safety monitoring board) or if the clinical trial participant at U.S. sites had received a COVID-19 vaccine that is neither approved nor authorized for use by FDA but is listed for emergency use by WHO; or
- b) A person's status two weeks after receiving the second dose of any combination of two doses of a COVID-19 vaccine that is approved or authorized by the FDA, or listed as a two-dose series by the WHO (i.e., a heterologous primary series of such vaccines, receiving doses of different COVID-19 vaccines as part of one primary series). The second dose of the series must not be received earlier than 17 days (21 days with a 4-day grace period) after the first dose.

Employee Training

CMP will provide regular training for employees on the following topics using interactive methods that are easy to understand including verbal, visual, audiovisual and picture-centered handouts and other resources:

- CMP's COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- What is COVID-19 and how is it spread:
 - o COVID-19 is an infectious disease that can be spread through the air;
 - o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth;
 - o An infectious person may have no symptoms.
- Prevention of the spread of COVID-19 if you are sick:
 - o Signs and ~~s~~ymptoms of COVID-19;
 - o When to seek medical attention if not feeling well;
 - o The importance of obtaining a COVID-19 test;
 - o Not coming to work if the employee has COVID-19 symptoms.
- Physical distancing guidelines and requirements.
- ~~Physical distancing requirements have been eliminated except where an employer determines there is a hazard and for certain employees during major outbreaks.~~ Importance of washing hands with soap and water for at least 20 seconds or use of hand sanitizer if soap and water are not readily available.
 - o Hand washing should occur before and after using the toilet, eating, coming and going to work, after interactions with others, after contacting shared surfaces or tools, before and after wearing masks or gloves, and after blowing nose or sneezing.
- What is Personal Protective Equipment (PPE); when is it necessary; how to use, handle, and dispose of PPE. (Note, PPE must not be shared, e.g. gloves, goggles and face shields.)
- Methods to avoid touching eyes, nose and mouth;
- Coughing and sneezing etiquette;
- Proper use of face coverings;
- Avoiding sharing personal items with co-workers;
- Safely using cleansers and disinfectants;
 - o Reading labels, wearing proper personal protective equipment (PPE), hazard review and steps to minimize harm to employees using those products.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.

Procedures to Help Prevent the Spread of COVID-19 in the Workplace

Health Screening

CMP screens employees daily. Each CMP Campus monitors employee attendance and watches for employees showing COVID-19 symptoms. The procedures for health monitoring include:

- Employees are required to fill out a daily Self-Screening Form via the online ParentSquare portal which asks the following questions:
 - o Have you (staff) had close contact with someone who has tested positive for or is suspected to have COVID-19 in the last 14 days (if you are partially vaccinated/unvaccinated), 5 days (if you are fully vaccinated)? Yes /No
 - o In the last 48-24 hours, have you (staff)/your child(ren) experienced any of the following NEW symptoms? Yes/No
 - Fever (over 100.4 °F) and/or chills
 - Headache
 - Cough
 - Sore throat
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Chills
 - Muscle or body aches
 - New ~~Loss~~ loss of taste and smell
 - Congestion or runny nose
 - Gastrointestinal (nausea, vomiting or diarrhea)

If an employee answers 'yes' to any of the above, CMP will follow the latest CDPH guidelines on quarantine and isolation. If an employee answers 'yes' to any of the above, they will be instructed, to go home immediately, or stay at home, and self-isolate until they are asymptomatic for at least 24 hours without the use of any medication, other symptoms have improved, and they have a negative test for SARS-COV-2 OR a healthcare provider has provided documentation that the symptoms are typical of their underlying chronic conditions (e.g., allergies or asthma) OR a healthcare provider has confirmed an alternative named diagnosis (e.g., Streptococcal pharyngitis, Coxsackie virus), OR at least 10 days have passed since symptom onset, OR the student or staff member has been provided a return to school form from County Public Health.

Note, if the health screening is conducted indoors at the workplace, CMP will ensure that face coverings are used during screening by both screeners and employees and/or guests/visitors. If temperatures are measured, non-contact thermometers will be used.

Health Monitoring

- CMP will monitor employees throughout the day. If an employee is not feeling well and is exhibiting symptoms that may be attributed to COVID-19, such as acute respiratory symptoms or a fever, CMP will do the following:
 - o Send the employee home and instruct them to follow CDPH guidelines and local public health department recommendations. (see above and/or CMP Re-Opening Plan).
 - o Provide resources including how to seek medical care information.

- o Explain that the Human Resources Department will reach out to them concerning compensation for the time off through paid sick leave or another vehicle.
- If informed that an employee tests positive for COVID-19, CMP will provide notice to health officials in the county in which they are working to thus provide CMP with further guidance. Information includes but is not limited to:
 - o The employee's work location, work hours, general and specific work duties, if the employee has traveled to multiple worksites recently, and the last day the employee was at work. Identify who has been in contact with the employee. The employee's name will not be disclosed unless asked to by the health officials.

Good Sanitation Practices

CMP will practice good sanitation practices including, but not limited to the following:

- Check restroom facilities frequently and make sure they are clean, sanitary, and appropriately stocked with necessary supplies (i.e. toilet paper, soap, paper towels, etc.).
- Make sure handwashing supplies are re-stocked regularly.
- Make sure staff have access to effective hand sanitizer, and prohibits hand sanitizers that contain methanol (i.e. methyl alcohol).
- Assign an employee to provide appropriate PPE, including but not limited to, gloves and masks.
- Sanitize common spaces and equipment at least once daily.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, CMP:

- Encourages frequent hand washing and posts signs on how to properly hand wash.
- Evaluates handwashing stations and ensures they are stocked.
- Provides employees with an effective hand sanitizer, and prohibits hand sanitizers that contain methanol (i.e. methyl alcohol).

Cleaning and Disinfecting

CMP will establish a once a day routine in regards to cleaning and disinfecting common surfaces and objects in the workplace. This includes but is not limited to:

- Benches, chairs, containers, copy machines, counters, doorbells, door handles, knobs, office supplies, tables, refrigerators, other kitchen appliances, vending machines, restroom and bathroom surfaces.
- The process of disinfecting includes providing disinfecting products, any PPE required for their safe use along with review of manufacturer instructions for proper use.
- Make cleaning products available at all times for staff members.
- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees of the frequency and scope of cleaning and disinfection.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by either the employee themselves, or the janitorial staff/service.

Limit Non-Essential Visits and Travel

CMP will limit non-essential visits and travel including, but not limited to the following:

- CMP will eliminate, and reduce, all non-essential and non-related services, such as group meetings where social distancing cannot be maintained, field trips, and after school enrichment activities.
- CMP Employees will reference the CSP Travel Advisory section for specific guidance related to travel as outlined by the CDPH.

Engineering Controls

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

- Opening windows or doors;
- Increasing filtration efficiency to the highest level compatible with the existing ventilation system, if possible.

The following will be taken into consideration:

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke;
- How the ventilation system will be properly maintained and adjusted, whether CMP owns and operates the building, or not.

Face Coverings

Definition – Face Covering

“Face covering” means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or tightly woven fabric or non-woven material of at least two layers (i.e., fabrics that do not let light pass through when held up to a light source) that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they shall have two layers of fabric or be folded to make two layers. A face covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

The definition includes an exception for clear face coverings or cloth face coverings with a clear plastic panel that meet the definition of Face Covering that may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker’s mouth or facial expressions to understand speech or sign language.

Face Covering Requirements at Work

Fully vaccinated persons are not required to wear a face covering in indoor spaces but are encouraged to do so if they prefer.

~~Cloth-F~~face coverings are required in all indoor spaces for all persons who are not fully vaccinated with limited exceptions outlined by the California Department of Public Health.

The following exceptions to the use of face coverings still apply at CMP:

- When an employee is alone in a room, ~~or~~ their individual work space, ~~or a vehicle.~~
- While eating or drinking provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent feasible.~~or outside.~~
- 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. Alternatives will be considered on a case-by-case basis.
 - If their condition or disability does not permit a non-restrictive alternative, the employee shall be at least six feet apart from all other persons and either fully vaccinated or tested at least weekly for COVID-19 during paid time and at no cost to the employee.
- 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 or allowed non-restrictive alternative, shall 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 during paid time and at no cost to the employee.

For CMP Employees who are working with students please see the COVID Safety Plan (CSP) for guidance.

CMP will provide clean, undamaged face coverings, including an N95, to any employee who requests one. CMP will ensure masks are properly worn by employees over the nose and mouth when indoors. CMP will provide training on the use of N95 respirators.

Employees who need a face covering may ask their site Administrator, Office Manager, or Site Safety Coordinator for one.

Physical Distancing

Physical distancing requirements have been eliminated except where an employer determines there is a hazard and for certain employees during major outbreaks.

Identification and Evaluation of COVID-19 Hazards (Safety Audit)

CMP will conduct periodic safety audits to identify and evaluate potential COVID-19 hazards. Site Safety Coordinators and Site Administrators will participate in the identification and evaluation of COVID-19 hazards by utilizing the Appendix **BC**: Identification of COVID-19 Hazards form, or something similar.

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by engaging in group discussions regarding COVID-19 and potential hazards, self-identifying hazards and informing their administrator, and participating in CMP surveys.

CMP will implement the following in regards to their safety audit:

- 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.
- Conduct Network / Site Specific evaluations using the Appendix **BC**: Identification of COVID-19 Hazards form.
- Conduct periodic inspections using the Appendix **ED**: COVID-19 Inspections form, or something similar, as needed to identify work conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the COVID-19 policies and procedures.
- Evaluate existing COVID-19 prevention controls at CMP and the need for different or additional controls.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, the workplace.
- Consult with the local County Health Departments and work in partnership with their nurses for site visits for further identification and mitigation of exposure.

Correction of COVID-19 Hazards

Potentially unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix **ED**: COVID-19 Inspections form, or something similar, and corrected in a timely manner based on the severity of the hazards, as follows:

- The severity of the hazard will be assessed and correction time frames assigned, accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

System for Communicating

The goal of CMP during this pandemic is to ensure effective two-way communication with employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how.
- That employees can report symptoms and hazards without fear of reprisal.
- Procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- How employees can access COVID-19 testing, though not required.

- In the event CMP is required to provide testing because of a workplace exposure or outbreak, CMP 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 individuals in contact with the CMP workplace) may be exposed to, what is being done to control those hazards, and COVID-19 policies and procedures.

Symptomatic and Sick Employees

CMP stresses the importance of employees staying home if either they, anyone they live with, or anyone they have recently been in contact with is sick or is recently confirmed to have tested positive for COVID-19. If an employee has any question on whether their contact counts as a potential exposure, please contact your supervisor, manager, or IPP Coordinator as soon as possible.

Should CMP have a COVID-19 case at a site, CMP will follow the guidelines below:

- Clean and disinfect applicable work areas immediately, following CDC guidelines using proper disinfection procedures and appropriate personal protective equipment.
 - CMP is implementing the use of electrostatic sprayers.
- **Per SB 1159**, document infected employee's work location, work hours, and general and specific work duties. If the employee recently traveled to multiple worksites, document their travel times and last day worked. Report non-identifying information regarding the positive test to the above listed workers' compensation insurance carrier.
- **Per AB 685**, will advise, in writing, affected employees or subcontracted employees within one business day.
- When SB 1159 and AB 685 do not apply, identify and confidentially contact anyone who had contact with a symptomatic employee.
- Contact the local public health department and follow their recommended protocols.

In addition, where CMP has a COVID-19 case in the workplace, CMP will limit transmission by:

- Ensuring that employees with a confirmed COVID-19 case are excluded from the workplace until the return-to-work requirements are met.
- ~~Excluding-Ensuring that~~ employees with a COVID-19 exposure follow the return-to-work requirements. from the workplace for 10 days after their last known COVID-19 exposure to another person with a positive COVID-19 case.
- Continuing and maintaining an employee's earnings, and all other employee rights and benefits whenever it's been demonstrated that the COVID-19 exposure is work related. This will be accomplished by employer-provided employee sick leave benefits. If the employee isn't covered by worker's compensation, they may be eligible for FMLA and SDI if they have worked for their employer for at least 12 months; have at least 1,250 hours of service over the previous 12 months.
- Providing employees at the time of exclusion with information on available benefits.

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

- Notified within one business day of potential exposure, in a way that does not reveal any personal identifying information to the COVID-19 case, and in a manner that CMP normally uses to communicate employment-related information.
 - The notice shall include the cleaning and disinfection plan required by Labor Code section 6409.6(a)(4). The notice will be sent to all employees and independent contractors who were on the premises at the same worksite as the COVID-19 case during the high-risk exposure period.
- As essential employees our staff are covered by their insurance and CMP will allow staff to receive free testing through their personal insurance carrier. CMP also participates in free community testing for school employees offered by the local county public health department.
- Investigate 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.

Return-to-Work Criteria

- Employees with positive COVID-19 cases and experiencing COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared. They have a negative test for SARS CoV 2, OR a healthcare provider has provided documentation that the symptoms are typical of their underlying chronic condition (e.g., allergies or asthma) OR a healthcare provider has confirmed an alternative named diagnosis (e.g., Streptococcal pharyngitis, Coxsackie virus), OR at least 10 days have passed since symptom onset, OR the student or staff member has been provided a return to school form from County Public Health.
- Employees with positive COVID-19 cases, but who never developed COVID-19 symptoms will not return to work until a minimum of ~~ten~~ 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.
- 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.

- If an employee is ordered to isolate or quarantine by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. ~~If no period was specified, then the period will be ten days from the time the order to isolate was effective.~~

Exclusion of COVID-19 Cases – Exceptions

1. Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms do not need to be excluded if they wear a face covering and maintain six feet of distance from others at the workplace for 14 days following the last date of close contact.
2. COVID-19 cases who returned to work 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. This exception only applies if these employees wear a face covering and maintain six feet of distance from others while at the workplace for 14 days following the last date of close contact.
3. COVID-19 cases who returned to work who never developed COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the first positive test. This exception only applies if these employees wear a face covering and maintain six feet of distance from others while at the workplace for 14 days following the last date of close contact.

IPP Disease Investigation

If an infectious disease case is reported, an investigation will be completed to determine if the case is deemed work-related. The assigned investigator will interview the injured worker and, if warranted, submit a claim to CMPs workers' compensation insurance carrier for further investigation.

In accordance with California SB 1159, CMP will report positive employee COVID-19 PCR (Polymerase Chain Reaction) tests to their workers' compensation insurance carrier listed above with personal information redacted.

In accordance with California AB 685, CMP will advise, in writing, affected employees or subcontracted employees within one business day should a COVID-19 exposure event occur.

Positive cases, found to be work-related, must be posted on the OSHA-300 log with employee name redacted for privacy.

Investigating and Responding to 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 CMP 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.

CMP schools in Sacramento County utilize the Sacramento County Public Health on-line system for COVID-19 Reporting & Contact Tracing for Schools, and is located at the following link: https://saccountyct.sjc1.qualtrics.com/jfe/form/SV_bC6AmScjZXKnGMB. For CMP-Shingle Springs will use the California Department of Public Health Shared Portal for Outbreak Tracking: https://cdph.force.com/SPOT/s/IntakeForm?language=en_US pursuant to direction from El Dorado County Public Health.

Reporting, Recordkeeping, and Access specific to COVID-19

In regards to reporting, recordkeeping and access, specific to COVID-19, CMP will:

- Report information about COVID-19 cases at the workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as

defined under CCR Title 8 section 330(h), of an employee occurring in the place of employment or in connection with any employment.

- Maintain records of the steps taken to implement the written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make the written COVID-19 Prevention Program available at the workplace to employees and to representatives of Cal/OSHA immediately upon request.
- For CMP schools in Sacramento County (American River, Capitol, Carmichael, Elk Grove, and Orangevale), CMP will use the Sacramento County Public Health link (https://saccountyct.sjc1.qualtrics.com/jfe/form/SV_bC6AmScjZXKnGMB) to report a case (a case is a person who has tested positive for COVID-19) or a contact (a contact is a person who may have been exposed to the case for at least 15 minutes and within 6 feet, such as students sharing a classroom or employees sharing a workspace, regardless of whether one or both people were masked. The information will be made available to employees or as otherwise required by law, with personal identifying information removed.
- For CMP School in El Dorado County (Shingle Springs) CMP will use the California Department of Public Health Shared Portal for Outbreak Tracking: https://cdph.force.com/SPOT/s/IntakeForm?language=en_US.

IPP Policy Enforcement/Disciplinary Procedures

As with general safety orders within the Injury and Illness Prevention Program (IIPP), compliance with pandemic controls is mandatory and shall be considered a condition of employment.

The failure to adhere to safety policies and procedures established by CMP can have a severe impact on everyone involved. Unsafe acts cannot only threaten the health of the individual involved, but also of their co-workers.

Additional Considerations

See Appendix E for additional considerations regarding COVID-19

Resources

- **Centers for Disease Control and Prevention**
 - [Businesses and Workplaces: Plan, Prepare, and Respond](#)
 - [Cleaning and Disinfecting: Plan, Prepare, and Respond](#)
 - [General Business Frequently Asked Questions](#)
 - [Investigating and responding to COVID-19 cases in non-healthcare work settings](#)
 - [Prevent Getting Sick](#)
- **Federal OSHA**
 - [US Department of Labor - OSHA COVID-19 Landing Page](#)
 - [US DOL OSHA PDF on COVID-19 Workplace Prep \(EN\) and \(Spa.\)](#)
- **National Institute for Occupational Safety and Health**
 - [NIOSH COVID-19 Information Landing Page](#)
- **Cal OSHA**
 - [Cal OSHA Title 8 - Aerosol Transmissible Diseases](#)
 - [Model Exposure Control Plan for Aerosol Transmissible Diseases](#)
 - [COVID-19 Emergency Temporary Standards Frequently Asked Questions](#)
- **California Department of Public Health**
 - [CA Department of Public Health COVID-19 Landing Page](#)
 - [CA Department of Public Health](#)
 - https://cdph.force.com/SPOT/s/IntakeForm?language=en_US
- **California Department of Fair Employment and Housing**
 - [DFEH Employment Information on COVID-19](#)



Appendix A: COVID-19 Training Roster Template

Date:

Person that conducted the training:

Topic Discussed [provide a brief description of the topic covered in this training]:

Employee Name	Signature

Appendix B: Documentation of Employee COVID-19 Vaccination Status

Confidential

<u>Employee Name</u>	<u>Fully or Partially Vaccinated¹</u>	<u>Method of Documentation²</u>

Appendix **BC**: Identification of COVID-19 Hazards

CMP, in alignment with our Safety Operations Plan, will identify COVID-19 Hazards using our established Risk Assessment process.

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious.

Per previous school guidance, CMP had to:

(1) Establish a written, worksite-specific COVID-19 prevention plan at every facility. CMP is currently following the California Department of Public Health guidance. Please see the CDPH Document for full details: <https://files.covid19.ca.gov/pdf/guidance-schools.pdf>.

(2) Perform a comprehensive risk assessment of all work areas and work tasks. Per CMPs SOP, the Network conducted COVID-19 Risk Assessments.

The first step of the Site Emergency Response Plan is to conduct a risk assessment. The assessment identifies situations and/or hazards which have the potential for disrupting a school, causing casualties or damaging school facilities and/or property.

The identified hazard is COVID-19, please Remember CMP's Risk Assessment Components:

Preparedness, Prevention and Mitigation Overview

Preparedness is achieved and maintained through a continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action. Ongoing preparedness efforts require coordination among all those involved in emergency management and incident response activities. CMP fosters preparedness at all levels including students, parents, teachers, and staff. Examples of preparedness actions include maintaining this plan, conducting training, planning and implementing drills, etc.

Prevention includes actions to avoid an incident or to intervene to stop an incident from occurring. CMP is committed to taking proactive prevention measures whenever possible to protect the safety and security of our stakeholders.

Mitigation includes activities to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities. CMP has taken action to reduce or eliminate the adverse effects of natural, technological, chemical and human-caused hazards on people and property, and in this case, COVID-19.

Hazard Analysis Summary

The Site Safety Committee will utilize the Risk Assessment Template below and assess the interior and exterior portions of all school building and school grounds for potential hazards which COVID-19 may impact the site and stakeholders (staff, volunteers, parents, contractors, and students). The results of the assessment will be used by the site to address further mitigation or preparedness steps needed to take to improve the state of preparedness.

Identify and characterize the hazard.	Evaluate each hazard for the severity and frequency.	Estimate the risk.	Determine the potential societal and economic effects and indirect effects.	Determine the acceptable level of risk.	Identify risk-reduction opportunities.
<ul style="list-style-type: none"> • What are the characteristics of the hazard? • What causes the event? • How does it trigger or relate to other hazards? 	<ul style="list-style-type: none"> • What is the probability of the hazard/event happening annually, every 10 years or once a century? • What factors enhance or deter the probabilities? • What measurements or scales can be applied to determine severity? • Could other factors influence severity and frequency? 	<ul style="list-style-type: none"> • Identify and quantify what will be affected by the event/hazard. This step imposes the human and built environment that could be affected, damaged, and/or disrupted. • Include in the analysis the general building stock, inventories of lifelines and essentials. Population and developmental concentration need to also be included. 	<ul style="list-style-type: none"> • Consider direct economic loss. • Consider indirect losses as well. (Replenishing supplies, or relocation, etc.) 	<p>Use steps 1 – 4 to establish acceptable loss of risk.</p> <ul style="list-style-type: none"> • What level of damage or impact will be tolerated? • Consider societal effects. • Assess public perception. (Political consequences of taking or not taking action to address the risks.) 	<ul style="list-style-type: none"> • What cost effective actions will reduce or mitigate unacceptable risks? • Identify and implement outcome.

and,

(3) Designate a person/people at each school site to implement the plan.

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, break or eating areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Identification of COVID-19 Hazards Template

Person/s conducting the evaluation:

Date:

Name(s) of employee and authorized employee representative that participated:

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

Appendix **ED**: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
See www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to the CMP Network.			
Engineering			
Barriers/partitions			
In classrooms			
In offices			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Front Office			
<u>Barriers and partitions</u>			
Desks of Staff Members			
Front Desks / Reception			
Sign In Sheets			
Community Pens			
Six Feet of Distance			
Hand Sanitizer			
Cleaning Supplies			
Masks to provide to staff if one is left at home.			
Thermometer			

Signage			
Directional signs			
Face Covering			
Wash your hands frequently			
Six Feet of Distance			
Cover your cough			
Maximum Occupancy			
Community Supplies			
Copy Machine			
Pens/Tape/Staplers			
Cups/Plates/Silverware			
Tables / Work Spaces			
HVAC			
HVAC to settings that bring in outside air,			
MERV 13 or high air filters			
Cleaning			
Bathroom Surfaces (toilet and sink handles; soap/towel dispensers)			
Community spaces			
Door Handles			
Light Switches			
Staff Room/s (counters, tables, chairs, etc.)			
Water Dispensing Stations			
Safety Data Sheets			
Portable Hand Washing Stations			
Do you have them at your site?			
Classrooms			
Montessori Materials			
Has a cleaning schedule been put together for the Hybrid model			
Club M			
Montessori Materials			
Toys			
Games			
PE Equipment			
Playground Equipment			
Arrival and Departure			
Minimize distance between students			
Stagger drop off/pick up times			

Appendix E

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section will go into effect if CMP is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases at a CMP location within a 14-day period. Reference section 3205.1 for details.

This section of the CPP will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

COVID-19 Testing

- CMP provides COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:
 - Employees who were not present during the relevant 14-day period.
 - Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
 - COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.
- COVID-19 testing consists of the following:
 - All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, 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.
 - We provide additional testing when deemed necessary by Cal/OSHA.
- ~~CMP 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.~~
- ~~COVID-19 testing consists of the following:~~
 - ~~All employees in the exposed workplace 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, CMP will continue to provide COVID-19~~

~~testing of 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.~~

~~○ CMP will provide additional testing when deemed necessary by Cal/OSHA.~~

~~CMP continues to comply with the applicable elements of our CPP, as well as the following:~~

- ~~1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).~~
- ~~2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.~~
- ~~3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.~~

Exclusion of COVID-19 cases

~~CMP will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with the CPP **Exclusion of COVID-19 Cases and Return to Work Criteria** requirements, and local health officer orders if applicable.~~

Investigation of workplace COVID-19 illness

CMP will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with the 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**, CMP 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.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that 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. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Requiring respiratory protection in compliance with current guidelines (Section 5144).

Buildings or structures with mechanical ventilation

- We 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, we will use filters with the highest compatible filtering efficiency. We 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, if so, implement their use to the degree feasible.

Notifications to the local health department

- ~~Immediately, but no longer than 48 hours after learning~~ of three or more COVID-19 cases in the workplace, CMP will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- ~~CMP 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. CMP will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.~~

Additional Consideration #2

Major COVID-19 Outbreaks

This section will need to be added to the CPP should the workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.

This section of the 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

~~CMP will continue to comply with the Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, except that the COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week, or more frequently if recommended by the local health department.~~

~~CMP 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.~~

~~In addition to complying with our CPP and Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, we also:~~

- ~~• Provide employees in the exposed group with respirators for voluntary use in compliance with current regulations (section 5144(c)(2)) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.~~
- ~~• Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible.~~
 - ~~○ CMP may also utilize telework or other remote work arrangements; additional barriers at work stations; limit the number of people in an area or room; the use directional signs for flow of foot traffic; staggered arrivals, departure, work and break times.~~
- ~~• Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the physical distancing requirement (described above) is not always maintained.~~
- ~~• Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.~~
- ~~• Implement any other control measures deemed necessary by Cal/OSHA.~~

Exclusion of COVID-19 cases

~~CMP will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with the CPP Exclusion of COVID-19 Cases and Return to Work Criteria, and any relevant local health department orders.~~

Investigation of workplace COVID-19 illnesses

~~CMP will comply with the requirements of the CPP Investigating and Responding to COVID-19 Cases.~~

COVID-19 hazard correction

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

- ~~• In buildings or structures with mechanical ventilation, CMP 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, CMP will use filters with the highest compatible filtering efficiency. CMP 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.~~
- ~~• CMP 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.~~
- ~~• CMP will evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected~~
- ~~• Implement any other control measures deemed necessary by Cal/OSHA.~~

Notifications to the local health department

~~CMP will comply with the requirements of the Multiple COVID-19 Infections and COVID-19 Outbreaks Notifications to the Local Health Department.~~

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing

~~This section will need to be added to the CPP if CMP has workers in employer-provided housing.~~

~~CMP does not provide housing deeming this section not applicable.~~

Additional Consideration #4

~~COVID-19 Prevention in Employer-Provided Transportation to and from Work~~

~~This section will need to be added to the CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride share vans or shuttle vehicles, car pools, and private charter buses, regardless of the travel distance or duration involved. Reference section 3205.4 for details.~~

~~This section does not apply:~~

- ~~• If the driver and all passengers are from the same household outside of work, such as family members.~~
- ~~• To employer provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.~~

~~CMP does not provide transportation deeming this section not applicable.~~