

Section 11
Injury and Illness Prevention Program Addendum
Specific to a
COVID-19 Prevention Program

Board Approved 4/17/23

Updated per State Guidance to align with non-emergency regulations effective 02/03/23 – 02/03/25

All California employers are required to have a site-specific COVID-19 Prevention Program (CPP) that includes safety procedures to reduce the risk of exposure to an identified pandemic. The COVID-19 Prevention non-emergency regulations are in effect until February 3, 2025, except for the recordkeeping subsections that will remain in effect for three years. Per the Department of Industrial Relations, “[t]hese regulations include some of the same requirements found in the COVID-19 Prevention Emergency Temporary Standards (ETS), as well as new provisions aimed at making it easier for employers to provide consistent protections to workers and allow for flexibility if changes are made to guidance in the future from the California Department of Public Health.” 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 updating their IIPP to include COVID-19 Prevention Procedures 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).

This section of the CMP IIPP has been designed to conform to Cal/OSHA’s requirements and recommendations, https://www.dir.ca.gov/dosh/coronavirus/Non_Emergency_Regulations/ 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 The following COVID-19 Prevention Procedures have been established and remains effective until withdrawn.

The CPP applies to all locations where CMP operates and is available for review by any employee.

These changes/updates go into effect upon approval and remain in place through February 3, 2025, except for the record keeping subsections which are in effect until February 3, 2026. Additionally,

as information disseminates about COVID-19 and workplace practices, this Addendum is subject to sudden change. This living document allows CMP to continue to provide ever-improving safety measures per Cal/OSHA, 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

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 COVID-19 Prevention Procedures 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.

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.

CMP:

- Provides employee training on COVID-19 signs, symptoms, and prevention.
- If a mandate exists, requires the use of a face covering per CDC, state, and local health recommendations.
- If a mandate does not exist, employees will not be prevented from wearing a face covering if they prefer.
- Identifies, evaluates and 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 Prevention Program

For purposes of the CPP, all persons in the CMP Schools, are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.

COVID-19 is treated as an airborne infectious disease. Applicable California Department of Public Health (CDPH) and Cal/OSHA orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls include, but are not limited to:

- Remote work.
- Physical distancing.
- Reducing population density indoors.
- Moving indoor tasks outside.
- Implementing separate shifts and/or break times.
- Restricting access to work areas.
- Other controls as necessary.

Employee Training and Instruction

CMP will provide training and instruction on COVID-19 prevention:

- To new employees.
- To employees given a new job assignment involving COVID-19 hazards and they have not been previously trained.
- Whenever new COVID-19 hazards are introduced.
- When CMP is made aware of a new or previously unrecognized COVID-19 hazard.
- For supervisors to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.

Engineering Controls (Ventilation)

For our indoor workplaces, CMP will review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.

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

- Increasing filtration efficiency to the highest level compatible with the existing ventilation system, if possible;
- Considering portable Air Cleaners (HEPA Air Filters);
- Opening windows or doors.

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, cold, and wildfire smoke;
- How the ventilation system will be properly maintained and adjusted, whether CMP owns and operates the building, or not.

Face Coverings

Currently, employees are not required to wear a face covering in indoor spaces but are encouraged to do so if they prefer.

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

The following exceptions to the use of face coverings will apply at CMP if masks are required:

- When an employee is alone in a room, their individual workspace, or a vehicle.
- While eating or drinking.
- 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 an employee is not wearing a face covering due to this exception. CMP's Human Resources Department must have on file a Mask Exemption form signed by a physician located in California.

Employees will not be prevented from wearing a face covering when not required by this section, unless it creates a safety hazard.

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

Procedures to investigate COVID-19 illnesses at the workplace include:

- a. Determining the day and time a COVID-19 case was last present, the date of the positive COVID-19 tests or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms. A Google Form for each campus will be used to document this information.
- b. Effectively identifying and responding to persons with COVID-19 symptoms at the workplace.

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:

- o Send the employee home
 - o Provide the employee with a COVID-19 take home test
 - o Direct the employee to follow Public Health guidance related to Isolation and Quarantine
 - o Return to work when feeling better and allowed to do so based on public health guidance
- c. Encouraging employees to report COVID-19 symptoms to their supervisor, or designee, and to stay home when ill.

CMP will follow the CDPH Guidance for Local Health Jurisdictions on Isolation and Quarantine of the General Public. Employees will be directed to report COVID-19 symptoms to their supervisor who will then coordinate with the designee for reporting to Public Health and Workers Compensation Insurance.

Effective procedures for responding to COVID-19 cases at the workplace include:

- a. Immediately excluding positive COVID-19 cases (including employees excluded under CCR, Title 8, section 3205.1) according to the following requirements:
 - Positive COVID-19 cases can return to work after 5 days if the employee has a negative test, symptoms are improving, and they wear a face covering at work for an additional 5 days. Otherwise, most employees can return after 10 days.
 - CMP will follow current CPDH guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission including being notified that they had a close contact, being offered a face covering, and being provided with a COVID-19 take home test.
- b. 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.

- c. Upon excluding an employee from the workplace based on COVID-19 or a close contact, CMP will provide excluded employees information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, workers' compensation law, local governmental requirements, and CMP leave policies and leave guaranteed by contract.

This will be accomplished by employer-provided employee sick leave benefits. Staff who require a leave of absence due to a COVID-19 illness, may be eligible for FMLA and SDI. Staff are encouraged to contact CMP's Human Resources Department with any questions at cmphr@cacmp.org.

COVID-19 Testing at CMP

CMP will continue to make COVID-19 testing available, on site, at no cost to employees during employees' paid time to all employees who have had a close contact in the workplace.

Notice of COVID-19 Cases

Employees and independent contractors, who had a close contact will be:

- Notified as soon as possible, and 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.
- 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.

Reporting, Recordkeeping, and Access specific to COVID-19

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.

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.

Resources

- [Centers for Disease Control and Prevention](#)
- 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 COVID-19 Guidance and Resources](#)
 - [Cal/OSHA COVID-19 Prevention Non-Emergency Regulations](#)
 - [Cal OSHA Title 8 - Aerosol Transmissible Diseases](#)
 - [Model Exposure Control Plan for Aerosol Transmissible Diseases](#)
- California Department of Public Health
 - [CA Department of Public Health](#)
- [CA Department of Public Health The SMARTER Plan](#)
- California Department of Fair Employment and Housing
 - [DFEH Employment Information on COVID-19](#)
 - Sacramento County Department of Health
 - [Schools Team](#)

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: 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. Unredacted 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 COVID-19 case (suspect or confirmed) became known: [enter information]

Date investigation was initiated: [enter information]

Name of person(s) conducting the investigation: [enter name(s)]

COVID-19 Case Summary

Name	Contact Info	Occupation	Location	Last day and time present	Date of positive test and/or diagnosis	Date of first symptoms

Summary of employees, independent contractors, and employees of other employers that came in close contact [CCR Title 8, section 3205 does not require recordkeeping for close contacts. These tables are included to assist employers in keeping track of which close contacts they have notified to meet the notice requirements.]

Name	Contact Info	Date notified	Date offered COVID-19 testing (employees only)

Summary notice of a COVID-19 case (employees, employers, independent contractors) – during the infectious period and regardless of a close contact occurring.

Name	Date notified

Summary notice of a COVID-19 case (authorized representative of the COVID-19 case and employee who had close contact).

Name	Date notified

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]

Additional Consideration #1

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, regardless of vaccination status, during paid time, in our exposed group except for returned cases and employees who were not present during the relevant 14-day period(s).

Additional testing will be made available on a weekly basis to all employees in the exposed group who remain at the workplace.

Employees who had close contacts will have a negative COVID-19 test taken within three to five days after the close contact or will be excluded and follow our return-to-work requirements starting from the date of the last known close contact.

Face Coverings

Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

CMP will give notice to employees in the exposed group of their right to request a respirator for voluntary use.

COVID-19 investigation, review and hazard correction

CMP will perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19 when this addendum initially applies and periodically thereafter.

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 supply of outdoor air to indoor workplaces.
 - 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. CMP 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).
- Other applicable controls.

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.

Major Outbreaks

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- COVID-19 testing will be required of all employees in the exposed group, regardless of vaccination status, twice a week or more frequently if recommended by Sacramento County Health Department and/El Dorado County Health Department. Employees in the exposed group will be tested or excluded and follow our CPP return to work requirements. The twice a week testing requirement ends when there are fewer than three new COVID-19 cases in the exposed group for a 14-day period. We will then follow weekly testing requirement until there are one or fewer new COVID-19 cases in the exposed group for a 14-day period.
- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include:
 - Telework or other remote work arrangements.
 - Reducing the number of persons in an area at one time, including visitors.
 - Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel
 - Staggered arrival, departure, work, and break times.
 - Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.