



**CAL/OSHA COVID-19 Prevention Program (CPP)**

January 27, 2021

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

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. This document should be considered in addition to the DUSD Health & Safety Implementation Plan which also addresses many of these same issues.

**Date: January 27, 2021**

## Authority and Responsibility

The **COVID-19 District-Level Implementation Team** has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all directors and principals 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

Identifying the problem and selecting the intervention was driven by reviewing Center for Disease Control (CDC), California Department of Education (CDE) & California Department of Public Health (CDPH) guidelines and input from key stakeholders. Actions to be taken are as follows:

- Conduct workplace-specific evaluations and periodic inspections using the **Appendix A: Weekly Walkthrough Form** to identify unhealthy conditions, work practices, and work procedures related to COVID-19 policies and procedures.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our 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.

## Employee participation

To plan for reopening DUSD, the district leadership team assembled key constituent groups to gain feedback, conducted community and staff surveys. All stakeholder groups' voices and concerns were considered before drafting a reopening plan. A district-level COVID-19 Implementation Team was formed to draft a comprehensive, CDC, CDPH, and CDE informed COVID-19 Health and Safety Implementation Plan.

Representatives from the Dinuba Teachers Association, California School Employees Association, DUSD Leadership, Custodial Staff, Principals, and Teachers, were assembled to provide information, insight, express concerns to be addressed in the plan and participate in drafting and reviewing the DUSD's COVID-19 Health and Safety Implementation Plan.

Utilizing all pertinent guidance documents and resources, input from stakeholder groups, and constituent representatives, the DUSD District COVID-19 Implementation Team identified problems and issues to be addressed in a comprehensive health and safety reopening implementation plan. DUSD is committed to

anticipating and planning for barriers to a safe reopening. Knowing all barriers and **issues will not** immediately be apparent. DUSD has developed implementation teams at the district and site level and will problem-solve, address, and mitigate issues as they arise. Lastly, employees will also be encouraged to immediately report any unsafe conditions to their supervisor.

## **Employee screening**

Each day, prior to entering the campus, staff will follow the established protocol.

- Complete and report results of the **Daily COVID-19 Screening Report** using the tool provided, prior to arriving on campus.
  - Monitor symptoms of COVID-19 from the past 24 hours.
  - This **passive screening** information will be entered each day into the **Daily Screening Form via the tool provided.**
- Immediately upon entering campus, staff members should wash or sanitize their hands.
- All Staff members are required to use a mask/face shield with drape while on district property.

## **Correction of COVID-19 Hazards**

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix A: Weekly Walkthrough Form**, which will identify any hazards and corrective action will be taken based on the severity of the hazards, as determined by the DUSD site-based Implementation Specialist and/or the DUSD district-level Implementation Team.

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

### **Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- Reducing the number of on-site staff who are assigned to work in small physical environments (e.g. school site offices) by allowing remote work arrangements and staggering schedules.
- 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.
- When necessary, relocate staff to other district properties (Vocational Center) in order to provide a safe work environment.
- Disallow ride sharing in district vehicles.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

### **Face Coverings**

We provide clean, undamaged face coverings and ensure they are properly worn, on all DUSD properties, by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees and where required by orders from the California Department of Public Health (CDPH) or local health department

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- When an employee is working alone outside (e.g. Groundsmen).
- While eating and 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 possible.

- 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. Alternatives will be considered on a case-by-case basis.

### **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

- Plexi-glass barriers have been installed in school site offices and administration areas.

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

- HVAC units are cycling two hours prior to occupancy to increase outside air circulation.
- MERV13 filters will be utilized where applicable and changed a minimum of 4x per year.
- GPS Bi-Polar Ionization air purification units have been installed on over 450 HVAC and mini-split units. These units are scientifically proven to be effective against COVID-19, other viruses, smoke, and other particulates in the air.

### **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures:

- Special attention is being paid to disinfect high-touch points including door knobs, countertops, handrails, light switches, restroom fixtures, desks and phones, etc.
- Restrooms, communal spaces, front desks and lobby areas will be cleaned with increased frequency
- All employees will have access to cleaning supplies available for immediate and ongoing cleaning and disinfecting.
- All employees are responsible for disinfecting their own workstation and not sharing equipment or supplies.
- Photocopiers have been outfitted with anti-microbial film on high touch points.
- EPA-registered chemicals will be used for disinfection
- Nightly cleanings will follow DUSD Custodial Cleaning & Disinfection Process.
- Additional information can be found in the District's Health and Safety Implementation Plan.

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

- Symptomatic staff will notify their immediate supervisor, be sent home immediately, and encouraged to test.
- In the event of an Outbreak, all employees in the exposed workplace will be required to test.
- District facilities will be disinfected and fogged.
- If the test result is Positive, contact tracing will be conducted to identify all parties with subsequent exposure.
- Worker's Comp will be notified of any positive cases among staff.

### **Shared tools, equipment and personal protective equipment (PPE)**

- Employees will be instructed that PPE must not be shared, e.g., gloves, goggles and face

shields.

- All employees are responsible for disinfecting their own workstation and not sharing equipment or supplies.
- 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 **the employee**.
- Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

## **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer.
- Encourage employees to wash 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 CCR Title 8, section 3380, and provide 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. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

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.

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

This will be accomplished by using the **Appendix B: Tulare County Health & Human Services Contact Tracing form**.

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

- Offered COVID-19 testing at no cost during their working hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

## **System for Communicating**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing

and the possible consequences of a positive test.

- 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 will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- 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.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- 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 - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

## **Exclusion of COVID-19 Cases**

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits in accordance with applicable law whenever we've demonstrated that the COVID-19 exposure is work related.
- Providing employees at the time of exclusion with information on available benefits.

## **Reporting, Recordkeeping, and Access**

It is our policy to:

- Report information about COVID-19 cases at our 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 our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).

- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix B: Health and Human Services Contact Tracing Form** to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

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

- COVID-19 cases with 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.
  - COVID-19 cases who tested positive but never developed COVID-19 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.
  - If an order to isolate or quarantine 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 no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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**Dr. Joe Hernandez, Superintendent, Dinuba Unified School District**

## Appendix A: Weekly Walkthrough Form

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>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>Administrative</b>			
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			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>PPE</b> (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			





## Appendix C: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

## **Additional Consideration #1**

### **Multiple COVID-19 Infections and COVID-19 Outbreaks**

**[This section pertains to those instances where a workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]**

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

#### **COVID-19 testing**

- We 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 our 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, we 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.
  - We will provide additional testing when deemed necessary by Cal/OSHA.

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our 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**

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

#### **COVID-19 investigation, review and hazard correction**

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we 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:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our 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.
  - Respiratory protection.
  - [describe other applicable controls].

#### **Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We 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. We 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 pertains to those instances where the workplace experiences 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]**

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

#### **COVID-19 testing**

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

#### **Exclusion of COVID-19 cases**

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

#### **Investigation of workplace COVID-19 illnesses**

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

#### **COVID-19 hazard correction**

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

- In buildings or structures with mechanical ventilation, 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 with the ventilation system, 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 implement their use to the degree feasible.
- We 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.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

#### **Notifications to the local health department**

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.



