

COVID-19 Prevention Procedures (CPP) for Piedmont Unified School District

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

Date: 7/1/23

Authority and Responsibility

PUSD Chief Business Officer has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the procedures 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.

Application of the PUSD Injury & Illness Prevention Program (IIPP)

COVID-19 is a recognized hazard in our workplace that is addressed through our IIPP, which will be effectively implemented and maintained to ensure the following:

- When determining measures to prevent COVID-19 transmission and identifying and correcting COVID-19 hazards in our workplace:
 - All persons in our workplace 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 State of California and Alameda County Health Department orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls include:
 - Remote work if possible
 - Physical distancing.
 - Reducing population density indoors.
 - Moving indoor tasks outside.
 - Implementing separate shifts and/or break times if possible
- Training and instruction on COVID-19 prevention is provided:
 - To new employees.
 - Annual Training
 - 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 we are made aware of new or previously unrecognized COVID-19 hazards.
 - For supervisors to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.

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

- 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. The Covid Reporting Form will be used to document this information.
- Effectively identifying and responding to persons with COVID-19 symptoms at the workplace.

When 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, they are to immediately inform their supervisor. PUSD will immediately send employees with acute respiratory illness symptoms home with a free OTC COVID test or to medical care as soon as possible.

When an employee goes home because they are sick, follow the cleaning and disinfecting the building and facility guidelines to disinfect the area/room/office where the person worked, the tools and equipment they used prior to use by others.

- Encouraging employees to report COVID-19 symptoms and to stay home when ill.

PUSD employees must notify their supervisor before their scheduled shift and prior to arriving at the site, if they have a temperature of 100.4 or more, tiredness, chills, shortness of breath, difficulty breathing, nausea, vomiting, diarrhea, sore throat, loss of taste or smell, cough, or muscle pain. PUSD supervisors actively encourage sick employees to stay home.

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

- Immediately excluding COVID-19 cases (including employees excluded under CCR, Title 8, section 3205.1) according to the following requirements:

- i. COVID-19 cases who do not develop COVID-19 symptoms will not return to work during the infectious period.
 - ii. COVID-19 cases who develop COVID-19 symptoms will not return to work during the shorter of either of the following:
 - a. The infectious period.
 - b. Through 5 days after the onset of symptoms and at least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication.
 - iii. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case must wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.
 - iv. Elements i. and ii. apply regardless of whether an employee has been previously excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
- b. Reviewing current [California Department of Public Health \(CDPH\)](#) guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.
 - c. The following effective policies will be developed, implemented, and maintained to prevent transmission of COVID-19 by persons who had close contacts. Individuals who have had close contact with a COVID-19 positive person will:
 - i. Wear a well fitting mask for 10 days
 - ii. Be provided free tests and required to test 3-5 days after exposure

- d. 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.
- e. If removal of an employee would create undue risk to a community's health, PUSD may submit a request for a waiver to Cal/OSHA in writing to rs@dir.ca.gov to allow employees to return to work if it does not violate local or state health official orders for isolation, quarantine, or exclusion. PUSD does not plan on requesting a waiver.
- f. Upon excluding an employee from the workplace based on COVID-19 or a close contact, PUSD will provide via email 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 PUSD leave policies and leave guaranteed by contract.

Testing of Close Contacts

COVID-19 tests are available at no cost to all of our employees who had a close contact in the workplace. These employees will be provided with the information outlined in paragraph (4)(f), above. Exceptions are returned cases as defined in CCR, Title 8, section 3205(b)(11).

Notice of COVID-19 cases

Employees and independent contractors who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible, and in no case longer than the time required to ensure that the exclusion requirements of paragraph (4)(a) above, are met.

When Labor Code section 6409.6 or any successor law is in effect, PUSD will:

- Provide notice of a COVID-19 case, in a form readily understandable to employees. The notice will be given to all employees, employers, and independent contractors at the worksite.
- Provide the notice to the authorized representative, if any of:
 - The COVID-19 case and of any employee who had a close contact.
 - All employees on the premises at the same worksite as the COVID-19 case within the infectious period.

See Appendix B for Exposure notification procedures

Face Coverings

Employees will be provided face coverings and required to wear them when required by a CDPH regulation or order. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors. Face coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
3. 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 shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
4. During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed. If an employee is not wearing a face covering due to exceptions (4) and (5), above, the COVID-19 hazards will be assessed, and action taken as necessary. Employees will not be prevented from wearing a face covering, including a respirator, when not required by this section, unless it creates a safety hazard.

Ventilation

For our indoor workplaces we will:

- Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH **Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments** Piedmont Unified School District will develop, implement, and maintain effective methods to prevent transmission of COVID-19, including one or more of the following actions to improve ventilation:
 - Maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
 - In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
 - Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.
- Determine if our workplace is subject to CCR, Title 8 section 5142 Mechanically Driven Heating, Ventilating and Air Conditioning (HVAC) Systems to Provide Minimum Building Ventilation, or section 5143 General Requirements of Mechanical Ventilation Systems, and comply as required.

In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.



Date:

8/9/2023

Dr. Jennifer Hawn
Superintendent
Piedmont Unified School District

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.

WHEN A STUDENT OR STAFF MEMBER IS CONFIRMED POSITIVE FOR COVID-19

Parents/guardians must immediately report a COVID-19 case using a Google Reporting form [Covid Reporting Form](#) or by emailing healthcoordinators@piedmont.k12.ca.us Staff must report they tested positive for COVID-19 to their supervisor and fill out either a Google Reporting Form [Covid Reporting Form](#) or email the [Nurses](#) The COVID-19 Response Team will coordinate with the employee or parent/guardian to determine:

- When the case tested positive and began to experience symptoms
- When the case was infectious
- When the case was on a PUSD campus or at a district facility

COVID response is confidential - no student or staff names or identifying information will be shared.

STUDENT EXPOSURE NOTIFICATIONS

Parents and caregivers of students who were a close contact of a case during the infectious period will be notified in some situations.

STAFF EXPOSURE NOTIFICATIONS

Staff will be notified via email if they were a close contact with a case during the infectious period. Employees who had a close contact COVID-19 exposure in our workplace will be:

- Supplied with a take home COVID-19 test.
- Informed about benefits including COVID leave rights

System for Communicating

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

- Employees should report COVID-19 cases, as well as possible hazards to their supervisors and also either fill out the Google Case Reporting Form [Covid Reporting Form](#) or email the [nurses](#)
- In the event of symptoms or cases, the COVID-19 Response Team has been trained to perform contact tracing, provide isolation and testing guidance, make the required notifications to close contacts and report cases to Public Health as required.
- In the event of a workplace hazard that involves another employee, if an employee is unable to resolve with a co-worker an issue related to risk reduction practices, and in the interest of protecting community and workplace health, any employee should report, in writing, any unsafe condition in the working environment to the immediate supervisor. The supervisor shall, within two (2) working days, respond in writing to the employee, with a simultaneous copy to the Union leadership, stating what has been done to make the condition safe or, if no action will be taken, the reason(s) why. This method of resolving safety concerns shall not displace the right to file OSHA or other administrative complaints or to bring a grievance for violation of this procedure.
- Employees can report hazards without fear of reprisal.
- All staff positive COVID-19 test results must be reported to a supervisor, [Covid Reporting Form](#) and to the at the nurses at nurses@piedmont.k12.ca.us

Training and Instruction

The District 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. 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. COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptom

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 CDPH return-to-work requirements are met.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- 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.
- Keep a record of and track all COVID-19 cases.
- All confirmed COVID-19 cases in which the case was present at a district school or facility during the infectious period are reported on the district's Covid-19 Case Dashboard

Reporting and Recordkeeping

Appendix B **Investigating COVID-19 Cases** will be used to keep a record of and track all COVID-19 cases. These records will be kept by Human Resources/Nurses and retained for two years beyond the period in which it is necessary to meet the requirements of CCR, Title 8, sections 3205, 3205.1, 3205.2, and 3205.3.

The notices required by subsection 3205(e) will be kept in accordance with Labor Code section 6409.6 or any successor law.

Return-to-Work Criteria

Staff who test positive for COVID-19 may return to work in accordance with the [CDPH Guidance for Individuals Infected with or Exposed to COVID-19](#).

Additional Consideration #1

COVID-19 Outbreaks

This addendum applies if three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a 14-day period, unless a CDPH regulation or order defines outbreak using a different number of COVID-19 cases and/or a different time period. Reference CCR, Title 8 section 3205.1 for details.

This addendum will stay in effect until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 testing

We immediately provide COVID-19 testing available at no cost to our employees within the exposed group, regardless of vaccination status, during employees' paid time, except for returned cases and employees who were not present at the workplace during the relevant 14-day period(s).

Additional testing is 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.

COVID-19 investigation, review, and hazard correction

Piedmont Unified School District 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, review, and changes 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 supply of outdoor air to indoor workplaces.
 - Insufficient air filtration.
 - Insufficient physical distancing.
- Review updated every 30 days that CCR, Title 8 section 3205.1 continues to apply:
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing the outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing to the extent feasible.
 - Requiring respiratory protection in compliance with CCR, Title 8 section 5144.
 - Other applicable controls.

Ventilation

Buildings or structures with mechanical ventilation will have recirculated air filtered 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, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

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:

- The 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 Alameda County Department of Health. 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 requirements 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.
 - 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.