

# COVID-19 Prevention Program (CPP)

## Saratoga Union Elementary School District

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

**Date:** February 9, 2021

### Authority and Responsibility

The Superintendent or designee has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

### Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the Appendix A: Identification of COVID-19 Hazards form.
  - 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.
  - Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
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- Monitor County numbers and CA tier status need to remain stable enough that we would not bounce back and forth between being open for hybrid instruction and Full Distance Learning.
  - We are continuing to learn and refine processes to ensure the safety of students and staff as we welcome small groups back to campus. As we ramp up gradually, this learning will prepare us for when larger groups can return.
  - Ensure adequate supply of Personal Protective Equipment (PPE), testing, and contact tracing must be available.
  - Adopt a strong "stay home while sick or possibly sick" policy for all.

## Employee Participation

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

- Staff and Administration will conduct on campus reviews and inspections of school sites to identify COVID hazards and implement mitigation measures as needed to follow the most recent guidance released by the Center for Disease Control (CDC) and County Public Health Department (CPDH).

## Employee Screening

We screen our employees by:

- All staff members are required to conduct symptom screening on their workdays, even if working from home. Symptom screening is conducted via ParentSquare. The data is reviewed daily by the District Nurse and district administration.
- Daily screening questions will be adhered to Santa Clara County's school reopening guidance (Revised 12.14.20), in addition to any guidance from Santa Clara County public health department that is not listed in the school reopening guidance
- Daily screening questions are as follows:

Within the last 10 days have you been diagnosed with COVID-19 or had a test confirming you have the virus?

Within the past 14 days, have you had close contact with someone who has been in isolation for COVID-19 or had a test confirming they have the virus? Close contact is less than 6 feet distance for 15 minutes or more.

Have you had any one or more of these symptoms today or within the past 3 days? Fever (100 or higher) or chills, cough, loss of taste or smell, shortness of breath or difficulty breathing

Have you had any one or more of these symptoms today or within the past 3 days and that are new or not explained by another reason? Fatigue, muscle or body aches, headache, sore throat, nausea, vomiting or diarrhea

Within the last 10 days, have you traveled into Santa Clara County, directly or indirectly from a point of origin greater than 150 miles from the County's borders? If yes, you must quarantine for 10 days upon arrival and cannot come to campus. Please continue to monitor for symptoms for 14 days.

- If staff did not complete a screening on ParentSquare then they will be asked to complete a paper screening questionnaire with the same screening questions.
- Staff with any COVID-19 symptoms or direct exposure will be asked to stay home until testing and/or medical evaluation has been conducted.
- Staff coming onto campus must sign-in and place a "health screen cleared" sticker on their shirt.
- SUSD has communicated screening requirements to all staff and will provide periodic reminders throughout the school year.

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

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix B: COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

Any new issues will be identified during custodial inspection and daily observations by staff District wide. These issues will be recorded and reported to site administration and Director of Facilities via Covid-19 inspection form and internal work order system. Severity of issue will be determined and corrective action will be assigned and prioritized in a timely manner based on severity of issue or concern. Site issues will be corrected in 24-72 hours in order of priority. If a hazard exists that cannot be addressed immediately then an evaluation will be made to determine if an in-person class can be moved to another location on campus or classes will revert to full distance learning until the hazard is addressed. Follow up inspections of the area or issue will be done by the Facilities Director and or site principal to determine the issue has been resolved/corrected and staff will be notified.

## **Controls of COVID-19 Hazards**

### **Physical Distancing**

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

General Physical Distancing Requirements:

1. Staff and students/parents must be knowledgeable of physical distancing requirements recommended by the Santa Clara County Public Health Department.
2. Staff and students are trained on protocols for physical distancing for both indoor and outdoor spaces.
3. Signage is posted in prominent locations throughout each school site reminding students and staff about physical distancing.
4. Visitors are allowed on campus by appointment only.
5. Staff must maintain at least six feet of distance from one another and any visitors and parents on campus.
6. Large gatherings and assemblies will not be held for the foreseeable future.

Arrival and Departure:

Close contact between students, staff, families, and the community at arrival and departure will be minimized through the following methods:

1. Routes for entry and exit will be designated, using as many entrances and exits as can be supervised appropriately to decrease crowding at entry and exit points. Drivers will be instructed to remain in their vehicles, to the extent possible, when dropping off or picking up students and/or exchanging instructional materials.
2. When in-person drop-off is needed, only a single parent or caregiver will be allowed to enter the facility to pick up or drop off the student.
3. Adults entering campus for in-person pick-up or drop-off must wear a face covering.
4. Spaces will be marked six feet apart for adults waiting outside to drop off or pick up students on foot, by bicycle, or other means of active transportation.
5. Markings will also be placed on the ground to facilitate physical distancing of six feet at all school entry and exit points, bike racks, crosswalks near school sites, in classrooms and elsewhere on campus where students or staff are expected to cluster or form lines.
6. Crossing guards and school safety patrols must engage in safe distancing behaviors and wearing face coverings.

#### Indoor/Classroom Settings All Schools:

1. Class sizes will be as small as practicable.
2. Teacher/staff desks will be kept at a distance of at least six feet away from students' desks to minimize the risk of adult-to-child transmission.
3. Stable seating arrangements for students will be established to ensure that close contacts within classrooms are minimized and easily identifiable.
4. Students and staff will remain in stable classroom cohorts with the same students and teacher or staff together for the entire school day.
5. Spacing between students' desks will be kept at a distance of six feet away from other student desks to minimize the risk of child-to-child transmission.

#### Students with Disabilities:

1. Students with disabilities and staff providing special education and related services will rotate into general education classrooms for a portion of the day.
2. Staff maintain at least 6 feet of distance from everyone in the general education cohort, other than the student receiving the services.
3. Students with disabilities may spend a portion of the day in a separate classroom cohort for the provision of special education services.
4. We will minimize the number of close contacts between staff and students as much as possible.

#### Specialist Teachers:

1. Specialists may rotate into classrooms for specialized instruction (e.g., art, music) as long as they maintain at least 6 feet of distance from everyone in the cohort.

#### Substitute Teachers:

1. Substitute teachers can provide coverage for teachers who are absent as long as the substitute teachers maintain at least 6 feet of distance from everyone in the cohort.
2. SUSD has hired a permanent substitute teacher for the school year at each elementary school site to provide for stability in cohorts should a substitute teacher be needed.

#### Non-Classroom Settings:

1. Staff will not be allowed to eat or gather together in indoor spaces such as break rooms. Non-teaching staff can eat alone at their own desk/workspace if they cannot eat outdoors or alone in their car. Teachers can eat outdoors maintaining a six foot distance from others or alone in their car.
2. Staff workstations must be spaced at least six feet apart.
3. Markings will be placed on the ground in front offices to remind students/staff/visitors to maintain physical distancing.
4. Use of restrooms by groups of students will be staggered to the extent practicable.

Groups of students will be assigned use of certain restrooms if possible.

1. Use of library space will be staggered.
2. Student meals will be served outdoors, if feasible, instead of cafeterias. Students will be allowed to eat in their classrooms on rainy days while maintaining a six foot distance from others.
3. Activities will be conducted outdoors whenever possible, with appropriate physical distancing within cohorts.

#### Hallways and Lockers:

1. Minimize congregate movement through hallways as much as practicable. Stagger passing times when necessary or when students cannot stay in one room. Establish designated one-way walking/passage areas where possible.
2. Minimize use, if any, of lockers to avoid unnecessary mixing and congregation of students.

#### Walkers, Cyclists, and Carpools to/from school:

1. For individuals walking or biking to school campus, at least six feet of physical distancing should be maintained at all times.
2. If students are carpooling to school sites, it is recommended that they only carpool with members of their stable cohort.

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 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 current CDPH (Ca Department of Public Health) guidelines require use of face coverings for all staff and students unless exempt, for indoor environments, on school buses, and areas where physical distancing alone is not sufficient to prevent disease transmission.

#### Teachers and Staff:

1. All staff must use face coverings in accordance to CDPH guidelines unless Cal/OSHA standards require respiratory protection. Neck gaitors, masks with valves, face shields without a mask are not considered to be in accordance with CDPH guidelines and will not be allowed.
2. For staff who come into routine contact with others, CDPH recommends the use of disposable 3-ply surgical masks, which are more effective than cloth face coverings.
3. Staff who are unable to wear a face covering for medical reasons shall not be assigned duties that require close contact with students or other staff.
4. In limited situations where a face covering cannot be used for pedagogical or development reasons (e.g. communicating or assisting young child or those with special needs) a face shield with a drape can be used instead of a face covering while in the classroom as long as the wearer maintains physical distance from others. Staff must return to wearing a face covering outside of the classroom.
5. Face coverings will be provided for staff who lose or forget to bring a face covering to school or who are found to be wearing an inappropriate face covering.

#### Students:

1. Students in all grade levels (K-12) are required to wear face coverings at all times, while at school, unless exempted:
  - a. A cloth face covering or face shield should be removed for meals, snacks, or when it needs to be replaced. When a cloth face covering is temporarily removed, it should be placed in a clean, safe area, clearly marked with the student's name and date, until it needs to be put on again.
2. The face covering guidance recognizes that there are some people who cannot wear a face covering for a number of different reasons. People are exempted from the requirement if they have a medical or mental health condition or disability that would impede them from properly wearing or handling a face covering, those with a communication

disability, or when it would inhibit communication with a person who is hearing impaired. Those with communication disabilities can consider wearing a clear mask or a cloth mask with a clear panel when appropriate.

3. Persons exempted from wearing a face covering due to a medical condition, as confirmed by school district health team and therapists, must wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it.

4. Participants in youth sports should wear face coverings when participating in the activity, even with heavy exertion as tolerated. Under State rules, while Santa Clara County is in the Purple Tier of the State's Blueprint for a Safer Economy, the following sports and activities are allowed outdoors only so long as they follow all the requirements in this Section 9 and all applicable requirements in the Directive: archery, badminton, biking, bocce, cross country, dance (no contact), disc golf, golf, hiking, ice and roller skating (no contact), lawn bowling, martial arts (no contact), physical training programs (e.g., yoga, Zumba, tai chi), pickleball (singles), rowing/crew (with 1 person), running, shuffleboard, skeet shooting, skiing and snowboarding, snowshoeing, swimming and diving, tennis, track and field, walking, and other sports activities occurring outdoors that allow participants to easily maintain 6 feet of social distance from one another at all times. Under State rules, while Santa Clara County is in the Purple Tier of the State's Blueprint for a Safer Economy, the following sports and activities are prohibited, even outdoors: baseball, basketball, boxing, cheerleading, dance (intermittent or high contact), dodgeball, field hockey, football, gymnastics, ice hockey, ice skating (pairs), kickball, lacrosse, martial arts (intermittent or high contact), pickleball (doubles), roller derby, rowing/crew (with 2 people or more), rugby, soccer, softball, volleyball, water polo, wrestling, and any other sports activities occurring indoors or any sports activities that do not allow participants to easily maintain 6 feet of social distance from one another at all times.

5. Schools must develop protocols to provide a face covering to students who inadvertently failed to bring a face covering to school to prevent unnecessary exclusions.

6. Schools must exclude students from campus if they are not exempt from wearing a face covering and refuse to wear one provided by the school.

7. Schools should offer alternative educational opportunities for students who are excluded from campus because they will not wear a face covering.

Signage has been posted in high visibility areas to remind students and staff of where face coverings are required and the appropriate use of face coverings. SUSD will train and communicate with all staff and families regarding expectations for use of face coverings at school and how to wash/care for face coverings.

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

- When an employee is alone in a room.
- 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 wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

## **Engineering controls**

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

- Contact barriers (shields) have been installed at teacher desks, school site office desks, and other appropriate areas.

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

HVAC systems have been set to allow for maximum pull of outside air along with COVID-19 compliant MERV-13 filters per EPA and ASHRAE recommendations. Filters are changed quarterly and when the room has been identified that contained a person who has tested positive for COVID-19. Portable HEPA filter machines are provided for each classroom with on-campus learning to enhance air quality. All HVAC units will be evaluated by our internal HVAC maintenance team to ensure the proper ventilation and air changes in every classroom are being met District wide. All adjustments made will continue to be monitored. Outdoor space will be identified and designated for classroom activities. We will continue to monitor the air quality conditions posted by the Bay Area Air Quality Management and the appropriate guidelines will be followed.

## **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces:

PPE supplies and disinfecting materials will be monitored to ensure adequate supply is on hand and ordered when needed. School sites can place orders through the district's warehouse and custodians will monitor disinfecting supplies and order as needed.

Daily Procedures:

Custodians will wear appropriate PPE and implement the following:

1. Clean and wipe all high touch surfaces daily:

- desks
- chairs
- tables
- door handles
- light switches
- countertops
- phones
- keyboards
- remote controls
- toilets
- faucets
- sinks
- handrails
- elevator button (Redwood)
- any shared items or devices

2. Trash will be emptied daily.

3. Restrooms will be cleaned three times per day, remove debris, and restock supplies as needed. High touch points will be disinfected.
4. Classrooms, workrooms, staff lounge, administrative office and all areas in use will be cleaned daily.
5. Each classroom will be supplied with cleaning products to wipe down light switches, door knobs, desk surfaces, shared objects, and any other high touch surfaces as needed.
6. Students will be taught to avoid sharing objects and focus on hand hygiene during regular breaks.

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

In the event the district has been notified of a positive case, all identified rooms the person(s) occupied will be identified and closed immediately. Trained custodial staff will don PPE equipment and apply approved EPA disinfecting cleaning solutions for use for COVID-19 utilizing Clorox 360 sprayers.

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

PPE must not be shared, e.g., gloves, goggles and face shields.

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:

1. Each occupied room will be provided with cleaning products that can be used with paper towels as needed.
2. Custodial staff will clean these areas daily.

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:

1. Installed hand sanitizers in all classrooms and common areas throughout each school campus.
2. Each classroom sink was evaluated to ensure faucets are in working condition.
3. Signage has been installed in each classroom and bathroom to reflect proper handwashing techniques per CDC guidelines for at least 20 seconds.
4. Students and staff must wash and/or sanitize their hands each time they enter the classroom.
5. One-touch faucets were installed in all school restrooms.

### **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 C: Investigating COVID-19 Cases form.

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

Evaluated by using the “Steps to Take In Response to Confirmed or Suspected COVID-19 Cases and Close Contact” document published by the Santa Clara County Department of Health. This is attached as Appendix C.

### **Suspected Case Response**

1. School administrators, nurses, and other healthcare providers will utilize the identified isolation room or area to separate anyone who exhibits COVID-19 symptoms.
2. Any students or staff exhibiting symptoms will immediately be required to wear a face covering and wait in an isolation area until they can be transported home or to a healthcare facility, as soon as practicable.
3. For serious illness, call 9-1-1 without delay.

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

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

1. Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
2. Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known COVID-19 exposure to a COVID-19 case.
3. Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever we’ve demonstrated that the COVID-19 exposure is work related. This will be accomplished by providing for 10 days of paid leave for COVID-19 related absences for unit members who are ill, under quarantine (not related to employee’s own personal travel). Such time will, if applicable, run concurrently with any leave rights under the CBA or applicable law.
4. Providing employees at the time of exclusion with information on available benefits.
5. A negative COVID-19 test will not be required for an employee to return to work as long as they met the quarantine requirement.

### **Confirmed COVID-19 Case(s) Response (Appendix C)**

1. School administrators will notify the County of Santa Clara Public Health Department within four hours of learning of any positive COVID-19 case via the Education Reporting Portal at [www.sccgov.org/schools](http://www.sccgov.org/schools).

2. School/District administrators will notify all staff and families in the school community of any positive COVID-19 case while maintaining confidentiality as required by state and federal laws. Anyone required to quarantine will be provided with Santa Clara County Department of Public Health Isolation and Quarantine guidelines.

3. Areas used by any sick person will be closed off for use until after cleaning and disinfection. To reduce risk of exposure, when it is possible, personnel will wait 24 hours before cleaning and disinfecting. If it is not possible to wait 24 hours, personnel will wait as long as practicable. SUSD will ensure a safe and correct application of disinfectants using personal protective equipment and ventilation as recommended.

#### 4. Return to Campus after Testing Positive

- Symptomatic individuals who test positive for COVID-19 can return at least 10 days since symptoms first appeared AND at least 24 hours with no fever AND improvement in other symptoms.
- Asymptomatic individuals who test positive for COVID-19 can return 10 days after their positive test result was collected.

#### Stable Cohort (presumes additional interactions)

1. All students and staff within the same classroom cohort as the confirmed COVID-19 case will be sent home immediately and instructed to be tested in accordance with Public Health Department recommendations, and to quarantine at home for at least 10 days from the last exposure and at least 24 hours after fever resolution and improvement in other symptoms.

#### Close Contacts

1. Close contacts will be sent home immediately and instructed to quarantine at home for 10 days from the last exposure and be tested in accordance with Public Health Department recommendations.

2. Symptomatic individuals, who are not close-contacts and who test negative for COVID-19 can return 24 hours after resolution of fever (if any) and improvement in symptoms. Documentation of a negative test result should be provided to school administrators. In lieu of a negative test result, students and staff will be allowed to return to school with a medical note by a physician that provides an alternative explanation for symptoms and reason for not ordering COVID-19 testing. Individuals who are close contacts to confirmed COVID-19 cases, who test negative on day 6 or later from last exposure, and remain asymptomatic, can return 10 days after the date of last exposure to the case. If a close contact continues to be exposed to a case during their isolation (e.g. household member), quarantine ends 10 days after the case's isolation period ends.

#### Testing

SUSD has contracted with Curative to implement on-site testing for staff. SUSD is currently developing a contract with Valencia Labs to provide a second testing lab. Frequency of testing is based upon local conditions and per recommendations from the Santa Clara County Public Health Department. Families are encouraged to test their child for COVID-19 before returning to campus with their healthcare provider or via local testing sites.

## 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, and how:

Employees should report COVID-19 symptoms to Kym Imai, Director Human Resources at [kimai@saratogausd.org](mailto:kimai@saratogausd.org) (408) 867-3424 x204

- 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:

Employees will be directed to 1) contact their local medical provider, 2) look up free testing sites provided by SCCPHD via [sccfreetest.org](http://sccfreetest.org), or 3) obtain free COVID-19 testing via SUSD's Curative testing on site.

- 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.
- When possible, staff meetings, professional development training and education, and other activities involving staff will be conducted via video or phone conference.
- If in-person attendance is required, activities will take place outdoors, if feasible, and with appropriate physical distancing.

**Appendix D: COVID-19 Training Roster** will be used to document this training.

### **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 whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by

the procedures outlined in section "Exclusion of Covid-19 Cases" on page 9.

- 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 C: Investigating COVID-19 Cases** 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.

Ken Geisick, Superintendent



February 9, 2021

**Title of Owner or Top Management Representative**

**Signature**

**Date**

## Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. 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, elevators, break or eating areas, cool-down 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.

**Person Conducting the Evaluation:**

**Date:**

**Name(s) of Employees and Authorized Employee Representative that Participated:**

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

## Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

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			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<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			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Face shields/goggles			
Respiratory protection			

## Appendix C: Investigating 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 us 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.

**Date:**

**Name of Person Conducting the Investigation:**

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	

<b>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</b>	
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<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.

**Appendix D: COVID-19 Training Roster**

**Date:**

**Name of Person Conducting the Training:**

Employee Name	Signature

## **Additional Consideration #1**

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

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.

#### **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 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**.