

COVID-19 Prevention Program (CPP) for Franklin-McKinley 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 read in conjunction with the FMSD Health, Wellness & Safety Subcommittee document "Safety Preparedness Plan: protocols to Limit Exposure to COVID-19". It should also be noted that is FMSD goal to update the CPP with the latest guidance from Santa Clara County Public Health or other Federal, State and Local Regulations.

Last Updated: 1-28-21

Authority and Responsibility

Superintendent Juan Cruz (and designees) 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
- 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 Santa Clara County Public 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 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.
- Reference Health, Wellness & Safety Subcommittee document "Safety Preparedness Plan: protocols to Limit Exposure to COVID-19" to ensure daily measures to prevent the spread of COVID-19 are implemented.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by meeting with their Site Administrator and/or to the Head of the Department (e.g., Supervisor, Director, Cabinet Member, etc.). If they are not available, questions or concerns may be sent to Otilia Enriquez, Executive Assistant at Otilia.enriquez@fmsd.org.

Employee screening

We screen our employees by either using the Company Nurse application shared with all employees and their immediate managers and supervisors or using the Google Log at each school site. Each site is unique so the method of accessing the Google Log may be different (e.g. via QR Code, posted web address or via physical log at the front office)

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented by the School Site Administrator and/or Head of the Department, and corrected in a timely manner based on the severity of the hazards. The severity of the hazard will be assessed by administration and correction time frames assigned, accordingly. Based on the severity of the hazard, the Director of Facilities and Auxiliary and the Assistant Superintendent of Business Services should be consulted. Once a correction plan has been devised individuals are identified as being responsible for timely correction.

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:

- Eliminating the need for workers to be in the workplace – e.g., 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.
- Reference Health, Wellness & Safety Subcommittee document “Safety Preparedness Plan: protocols to Limit Exposure to COVID-19” for additional details.

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. All employees have been provided multiple cloth face coverings as well as disposable face coverings at the start of the school year. Disposable face covering are available upon request and in boxes placed at the front office or in various centralized locations within a department. Employees should wash their face coverings as often as possible to ensure effectiveness. If employees encounter anyone not wearing a mask, they should direct them to use a disposable face mask prior to entering a facility to conduct business. Custodians at each school site facility have access to more masks as needed. Site should evaluate inventory and contact the warehouse if the supply of masks are running low. Reference Health, Wellness & Safety Subcommittee document “Safety Preparedness Plan: protocols to Limit Exposure to COVID-19” for additional details.

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 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 have implement the use of physical barriers for situations where we cannot maintain at least six feet between individuals. In addition, FMSD has worked with each site and department to stagger employees entering the office to help maintain social distancing.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. HVAC systems are periodically reviewed and tested by staff and outside

consultants to ensure they are working appropriately and meeting acceptable indoor air quality levels. Any deficiencies noted are corrected as soon as possible. If the HVAC unit is down for maintenance or other reasons, we request staff to open windows or work from home until the HVAC unit is running properly again.

Cleaning and disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces. Reference Health, Wellness & Safety Subcommittee document "Safety Preparedness Plan: protocols to Limit Exposure to COVID-19" for additional details. The Facilities team along with the custodial team monitors supplies closely to ensure we have enough to meet daily cleaning and disinfecting routines. Staff can request additional supplies from the Warehouse, as needed.

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

- Identify the areas impacted
- Inform the Director of Facilities & Auxiliary, Site Admin (if applicable) and Site Custodial team of areas impacted
- Work with the Director of Facilities & Auxiliary to device cleaning and disinfecting plan in accordance with CDC guidelines. Typically this includes a 2 day period for the impacted area to be closed off from use and have the air circulate in the room prior to cleaning and disinfecting. If an entire site has been impacted, FMSD will contract with a specialized cleaning company to clean and disinfect areas impacted.

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 the employee using shared tools, equipment and PPE.

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:

- Evaluating handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer.
- Encouraging 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) and provide such PPE as needed.

Reference Health, Wellness & Safety Subcommittee document "Safety Preparedness Plan: protocols to Limit Exposure to COVID-19" for additional details.

Investigating and Responding to COVID-19 Cases

The investigation and response to a COVID-19 Case will be a joint effort by Cabinet members and Director of Facilities & Auxiliary as well as the site administrator (if the case is at a school site), and/or the Head of the Department, (if the case is within a department).

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

- Directed to quarantine, seek medical guidance from their medical providers immediately and directed to go get tested in accordance with Santa Clara County Public Health.
- Human Resources will be responsible to contact the exposed employee to discuss their rights and options after exposure.

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 symptoms and possible hazards to their immediate supervisor. If their immediate supervisor is not available they can report it to any Cabinet member or Human Resources personal to discuss next steps.
- That employees can report symptoms and hazards without fear of reprisal.
- FMSD will work towards 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 (e.g., sccfreetest.org)
- 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.
 - Note, FMSD has started mandatory testing of all employees coming into the office work through Curative every two weeks (adjusted for holidays and inclement weather). This testing is at no cost to the employee.
- Send an email to employees of a particular site that have had an exposure to COVID-19. This includes the last date of exposure, the number of close contacts (as defined by the Santa Clara County Public Health Department), what is being done to control those hazards, and reference pertinent guidelines that are being used in response to COVID-19 case.
- Inform representatives of the various unions and Cabinet of a potential exposure and positive cases.

Instructions and Training

We will provide various instructions and training that includes but not limited to:

- 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.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- 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 based on Santa Clara County

Public Health guidance 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. The employee will work with Human Resources to determine how these employee rights and benefits will be provided.
- 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.
- 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 on a periodic basis.

Return-to-Work Criteria

(Note the requirements below may change as the pandemic progresses. It is FMDS's goal to update criteria based on current guidance from SCC Public Health Department.)

- 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 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.



Jason E. Vann, Assistant Superintendent of Business Services