

Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - 3205, COVID-19 Prevention
 - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - 3205.2, Major COVID-19 Outbreaks
 - 3205.3, Prevention in Employer-Provided Housing
 - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
 - The four Additional Considerations provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for Little Shasta Elementary School

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

Date: 1/25/21

Authority and Responsibility

Todd Clark-Superintendent 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.

Employee participation

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

Employee screening

We screen our employees by temperature checks that will be conducted several times during the school day for both students and staff. "Breathing breaks" will be provided for all students and staff required to wear masks. Regular health questioning will be handled by Health and Sanitation Aide.

Passive Screening. Instruct staff to self-screen before leaving for work (check temperature to ensure temperatures below 100.4 degrees Fahrenheit, check for symptoms outlined by public health officials) and to stay home if they have symptoms consistent with COVID-19 or if they have had close contact with a person diagnosed with COVID-19. ii.

Active Screening. Engage in symptom screening as staff enter worksites, consistent with public health guidance, which includes visual wellness checks and temperature checks with no-touch thermometers (check temperature to ensure temperatures below 100.4 degrees Fahrenheit), and ask all staff about COVID-19 symptoms within the last 24 hours and whether anyone in their home has had COVID-19 symptoms or a positive test. 1. If a thermometer requiring a touch method (under the tongue or arm, forehead, etc.) is the only type available, it should only be used when a fever is suspected. 2. Thermometers must be properly cleaned and disinfected after each use. iii. All staff must wash or sanitize hands as they enter worksites. iv. Exclude employees who are exhibiting symptoms from the

workplace. 1. Staff members who develop symptoms of illness should be sent to medical care. Have emergency substitute plans in place. 2. Create a procedure for reporting the reasons for the exclusions. 3. Advise sick staff members not to return until they have met CDC criteria to discontinue home isolation.

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:

All staff have been trained to identify unsafe conditions related to COVID-19.

In our small school setting (6 employees) conditions are reported immediately to the administrator.

Hazards are corrected as soon as possible.

Follow-up measures are taken to ensure 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:

The school campus has been set up with social distancing standards for every area. The Cafeteria/MPR is set up with a place for each student identified that will be used for lunch and the After School program. Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. Markers have been placed in all areas where students line up that are 6 ft apart. Plexiglass partitions are installed in the classrooms.

Face Coverings

We provide clean, brand new face coverings every day 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. Students above 2nd grade are required to wear a facial mask in all indoor settings. New masks are provided for every case where a mask is lost or broken.

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.
- 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.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: The only exception to the 6 foot rule is in the K-2nd grade classroom where plexiglass partitions have been installed.

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

In accordance with CDC guidance, we ensure that ventilation systems and fans operate properly and increase circulation of outdoor air as much as possible by opening windows and doors and other methods. We do not open windows and doors if doing so poses a safety or health risk to children using the facility (for example, allowing pollen in or exacerbating asthma symptoms). We maximize central air filtration for heating, ventilation, and air conditioning (HVAC) systems (targeted filter rating of at least MERV 13). All ventilation systems were checked by a professional before school opened.

Cleaning and disinfecting

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

In accordance with CDC and California Department of Pesticide Regulation (CDPR) guidance, and in consultation with local public health officials, we developed a plan that includes: A safe and correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning. Disinfecting surfaces between uses, such as: Desks and tables, Chairs, Keyboards, phones, headsets, copy machines. Disinfecting frequently—at least daily—high-touch surfaces, such as 1. Door handles 2. Handrails 3. Drinking fountains 4. Sink handles 5. Restroom surfaces 6. Toys, games, art supplies, instructional materials 7. Playground equipment.

When cleaning, airing out the space before children arrive is necessary. Our plan is to do thorough cleaning when children are not present. Also closing off areas used by any sick person and not using before cleaning and disinfection. A defogger is used daily to sanitize the classrooms. A safe mixture of bleach and water is used for all sanitation and is remixed on a daily basis.

We ensure that sufficient supplies of hand sanitizers, soap, handwashing stations, tissues, no-touch trash cans, and paper towels are readily available. At our school, appropriate cleaning supplies are available on both a local and order level. The school has stockpiled an excessive amount of supplies to make it through the year.

An extra staff position was created for a Health & Sanitation Aide who works six hours daily, continuously disinfecting all surfaces including bathrooms, door handles, light switches desks, tables etc. We regularly inform the employees of the frequency and scope of cleaning and disinfection.

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

In accordance with CDPH guidance, when a student, teacher, or staff member or a member of their household tests positive for COVID-19 and has exposed others at the school, we will implement the following steps:

- i. In consultation with the local public health officials, the appropriate school official will consider whether school closure is warranted and length of time based on the risk level within the specific community as determined by the local public health officer.
- ii. In accordance with standard guidance for isolation at home after close contact, the classroom or office where the COVID-19-positive individual was based will typically need to close temporarily as students or staff isolate.
- iii. Additional close contacts at school outside of a classroom will also isolate at home.
- iv. Additional areas of the school visited by the COVID-19-positive individual may also need to be closed temporarily for cleaning and disinfection.
- v. We developed a plan for continuity of education, medical and social services, and meal programs and established alternate mechanisms for these to continue. The Little Shasta School district works closely with the county office of education and contracts nursing services there. That office closely monitors and works with the public health department. This triage will work to guide the district in appropriate decision making for all scenarios dealing with Covid-19 cases.

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 not be shared, to the extent feasible. Where

there must be sharing, the items will be disinfected between uses by the Health & Sanitation Aide.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

Train staff and students on proper handwashing techniques and PPE/EPG use, including the following:

- i. Scrub with soap for at least 20 seconds or use hand sanitizer if soap and water are not accessible. Staff and students should use paper towels (or single use cloth towels) to dry hands thoroughly.
- ii. Wash hands when: arriving and leaving home; arriving at and leaving school; after playing outside; after having close contact with others; after using shared surfaces or tools; before and after using restroom; after blowing nose, coughing, and sneezing; and before and after eating and preparing foods.
- iii. Starting from day one, students will be taught the new standards for hygiene at school. Schedules for all students and staff will allow for extra time for proper hygiene.

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.

As recommended by the CDC, all staff will wear face coverings. Per CDPH guidance, teachers may use face shields, which enable students to see their faces and to avoid potential barriers to phonological instruction. We will provide other protective equipment, as appropriate for work assignments.

1. For employees engaging in symptom screening, provide surgical masks, face shields, and disposable gloves.
2. For front office and food service employees, provide face coverings and disposable gloves.
3. For custodial staff, provide equipment and PPE for cleaning and disinfecting, including: A. For regular surface cleaning, provide gloves appropriate for all cleaning and disinfecting. B. Classified staff engaged in deep cleaning and disinfecting should be equipped with proper PPE for COVID-19 disinfection (disposable gown, gloves, eye protection, and mask or respirator) in addition to PPE as required by product instructions. All products must be kept out of children's reach and stored in a space with restricted access. C. Cal/OSHA requires that PPE be provided and worn to effectively protect employees from the hazards of the cleaning products used and training be provided to staff on the hazards of chemicals.

All proper protective equipment is in place.

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

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

In accordance with CDPH guidance, when a student, teacher, or staff member or a member of their household tests positive for COVID-19 and has exposed others at the school implement the following steps:

- i. In consultation with the local public health officials, the appropriate school official may consider whether school closure is warranted and length of time based on the risk level within the specific community as determined by the local public health officer.
- ii. In accordance with standard guidance for isolation at home after close contact, the classroom or

office where the COVID-19-positive individual was based will typically need to close temporarily as students or staff isolate.

- iii. Additional close contacts at school outside of a classroom should also isolate at home.
- iv. Additional areas of the school visited by the COVID-19-positive individual may also need to be closed temporarily for cleaning and disinfection.
- v. Develop a plan for continuity of education, medical and social services, and meal programs and establish alternate mechanisms for these to continue.
- vi. The Little Shasta School district works closely with the county office of education and contracts nursing services there. That office closely monitors and works with the public health department. This triage would work to guide the district in appropriate decision making for all scenarios dealing with Covid cases.
- vii. All employees are offered COVID-19 testing at no cost during their working hours.
- viii. Information on benefits during exclusion of COVID-19 Cases, FFCRA will be provided.

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, Todd Clark - Superintendent
- 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
Testing for employees is provided at no cost. A list of testing locations is provided and there are a significant number available. Results however, typically take 4 to 5 days because of our rural location and backlogs. Any employee with any symptoms is required to stay at home to quarantine until all symptoms are gone or a negative test result is presented.
- 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.

The Little Shasta School district works closely with the county office of education and contracts nursing services there. That office closely monitors and works with the public health department. This triage would work to guide the district in appropriate decision making for all scenarios dealing with Covid cases.

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.

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 providing FFCRA leave time as applicable.
- 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.
-

Todd Clark - Superintendent

 1/27/21

Appendix B: COVID-19 Inspections

Date: 1/25/21

Name of person conducting the inspection: Todd Clark

Work location evaluated: Little Shasta Buildings & Campus

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions	Good		
Ventilation (amount of fresh air and filtration maximized)	Inspected 8/25/20		
Additional room air filtration	Inspected 8/25/20		
Administrative			
Physical distancing	Good		
Surface cleaning and disinfection (frequently enough and adequate supplies)	Excellent		
Hand washing facilities (adequate numbers and supplies)	Good		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Excellent		
PPE (not shared, available and being worn)	Excellent		
Face coverings (cleaned sufficiently often)	Excellent		
Gloves	Excellent		
Face shields/goggles	Good		
Respiratory protection	N/A		

Date: 9/1/20, 11/10/20, 1/1/20, 1/18/21

Person that conducted the training: Todd Clark

[illegible]