

COVID-19 PREVENTION PROGRAM (CPP)

January 31, 2021

Seiad Elementary School District
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Seiad Valley, CA 96086

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COVID-19 Prevention Program (CPP) for Seiad Elementary School District

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

Date: January 31, 2021

Authority and Responsibility

Seiad Elementary School District 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: Employees may participate in identifying and evaluating COVID-19 hazards at staff meetings or in conversation with the administration at any time if they identify a hazard via email, phone or in conversation.

Employee screening

We screen our employees by: Daily answering a self-screening questionnaire to determine their health and well being, including daily temperature checks are given by non-contact thermometers. The employees sign in with their name and initials to signify their compliance. Cloth and disposable masks or face shields with drapes are available and required to wear at the school when two or more persons are in a room or a school vehicle.

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:

Once an unsafe or unhealthy work condition, practices or procedures are brought to the administration's attention through the Appendix B Inspection form, The COVID-19 liaison will consult with the administration, a time frame for correction will be discussed and documented and the correction(s) will be made. Follow-up measures are addressed weekly.

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:

- Teleworking when applicable and staggering the schedule for employees who need to work on site during distance learning.
- 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, such as entrance/exit doors only.
- Staggered arrival, departure, work, and break times.

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. Face coverings are provided to each employee and staff, both cloth and disposable. Information regarding cleaning the cloth mask is noted in the re-opening plan, available to the school community. Employees encountering non-employees will offer the mask to the visitors with hand sanitizer, and gloves prior to entry. In addition, a document is posted at the entrance stating the requirements for entry to the school as well as refusal to enter due to COVID-19 protocols.

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.

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: Plastic partitions on tables that provide seating less than six feet inside the school. For our school-provided transport, the schedule is staggered to allow for one student per row, except for siblings. Masks are worn and ventilation is increased, apart from exposure to inclement weather.

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

- Utilizing air purifiers in each room when outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.

- HVAC filters are MRV13, and maintenance staff cleans and replaces filters per manufacturer recommendations.

Cleaning and disinfecting

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

Van sanitization after each route is complete. Playground structure's sanitization after each recess/playground use in a.m. by classroom aide/van driver. Playground equipment's sanitization after S.A.F.E., daily by S.A.F.E. aide, playground monitors' ensure used equipment is locked after each recess. Each staff's direct desk, student desks/tables/chairs, surfaces, light switches and sink handles must be wiped twice daily and at the end of each shift.

The recess times have been increased to give staff time to sanitize hazard areas, restrooms and classrooms.

All staff will be trained in a Keenan sanitizing class prior to the school year beginning. Keep doors closed to rooms not in use; keep bathroom doors open; one child at a time.

Mid-morning (Teacher)/afternoon (Custodian) bathroom sanitization of surfaces, faucets, sink handles, door handles; keep a restroom/cleaning schedule in each room.

- Administration and maintenance ensure a month and-a-half amount of PPE and cleaning/sanitizing supplies are on site when possible.
- Informing the employees of the frequency and scope of cleaning and disinfection via a School Opening presentation in August, 2020, staff meeting prior to school opening in January 2021 and email/in-person correspondence updates when applicable.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: In consultation with the county public health department, the school will determine if there needs to be a school closure. If so, Plan C, distance learning, will be implemented. A school closure would be necessary for 14 days under state health guidelines and as determined by the local public health officer. Under Cal/OSHA regulations, if three or more employees contract the virus, the school/worksite must also close for 14 days.

That person will need to self-isolate at home for 14 days after the close contact. The entrance/exit, library (our designated room for isolation once exposure is determined), and other affected areas would need to close temporarily to be cleaned and sanitized.

The school will alert the school community of Covid-19 exposure or possible exposure. Staff will receive information regarding disability insurance, labor laws, and the Paid Family Leave and Unemployment Insurance.

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 each staff member after use with sanitation supplies available in each room and by maintenance staff, daily. All staff is expected to complete sanitation via online Keenan training at the beginning of the school year.

Sharing of the school vehicle 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:

have wall-mounted hand sanitizer dispensers in each room and additional mobile hand sanitizers for each employee on desks. Posters with instructions on handwashing and sanitizing of hands are in restrooms and above sinks in classrooms. Prior to school opening to staff in August, the administration evaluated handwashing stations and implemented additional hand sanitizing stations at the entrance. Recess schedules have been increased to accommodate staff to sanitize designated areas and wash hands for at least 20 seconds. Provided sanitizers and soap follow the recommended guidelines that prohibit methyl alcohol.

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.

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:

A local testing clinic will provide testing at our school site or at the nearby clinic without a cost to employees. Our COVID-19 liaison, Marsha Jackson, will conduct the contact tracing, in consultation with the county public health officer as well. The employee will be able to work from home, if able, or used paid sick leave until they have quarantined for 14 days. Staff will receive information regarding disability insurance, labor laws, and the Paid Family Leave and Unemployment Insurance.

The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

System for Communicating

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

- Employees should report COVID-19 symptoms and possible hazards to our COVID-19 liaison, Marsha Jackson. Seiad Elementary School's Re-opening plan states that employees can report symptoms and hazards without fear of reprisal. In addition, employees have staff meetings and regular verbal and email correspondence in regards to their status and offered flexible working opportunities, such as staggered staffing and working from home when ill or from concern of possible exposure from travel, etc. Seiad School's procedures for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-10 illness, such as a high-risk category, including 65 or older employees, are given opportunities to stagger their attendance and work from home. For COVID-19 testing, the Karuk Clinic comes to our school to test all staff unless employees wish to be tested elsewhere, such as a drive-in clinic in a nearby town, such as Yreka.
- Where testing is not required, how employees can access COVID-19 testing: Employees may obtain voluntary testing through the Karuk Medical Clinic in Happy Camp, their healthcare provider or other local testing centers, such as in Yreka.
- 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.

- Information related to COVID-19 hazards at Seiad School is expressed through Keenan trainings, staff meetings and email communication as well as posters positioned in prominent places such as bulletin boards, the school's entrance or a window that visitors can see on the school's windows or doors. In Seiad Elementary's re-opening plan that was first made available to our school community in August of 2020 and has been updated and posted on our website discusses how COVID-19 hazards are being controlled via our regular procedures.
- Weekly or otherwise regular communication, including staff meetings, in-person, by telephone conversations and via email is provided for employees by the Seiad School District or from the Siskiyou County Office of Education's nursing director, the public health official, Dr. Stutz, the governor or County and state Public Health Departments.

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.
- Plastic partitions placed on tables or desks, when seating is less than six feet from another person, helps to minimize the risk of traveling particles. For our transportation staff members, the procedure to stagger the seating of students, combined with mask use and opened windows, when not in inclement weather, combined with use of face masks, again, helps to minimize the receipt of traveling particles in enclosed spaces, less than six feet from another person outside one household.

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 employer-provided sick leave benefits. When Seiad Elementary School may have a COVID-19 case in our workplace, we will limit transmission by excluding the employee from the workplace for 14 days after the last known COVID-19 exposure. The employee may use sick leave days, personal days and days off without pay if contracted outside of school, as determined by the efforts of the school COVID-19 liaison and the Siskiyou County public health officer. In the event that the staff member has direct contact with students, such as the teacher or classroom aide, returning to distance learning will minimize the risk of exposure to other staff members and the student body.

- 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.
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Marsha Jackson, COVID-19 Liaison/
Valerie Conley McIntyre, Administrator

Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Portable, outdoor tents for shade during outdoor seating/classes, weather permitting			
HVAC filters updated			
Administrative			
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			
School purchased individual water bottles			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Marked Containers for Used Objects to be Sanitized			

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:

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

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:

All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

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

Additional Consideration #1- If Seiad Elementary School District has a workplace outbreak (three or more COVID-19 cases in a 14-day period. Reference section 3205.1)

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.
- [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2- If Seiad Elementary School District has 20 or more COVID-19 cases within a 30-day period. Reference Section 3205.2

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**.