



Hamilton Unified School District

COVID 19 Prevention Program (CPP)

January 30,2021

COVID-19 Prevention Program (CPP) for Hamilton Unified School District

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

Date: February 1, 2021

Authority and Responsibility

The District 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 reporting any conditions or situations considered hazardous by any employee. The report of these conditions or situations will be investigated by the district's administrative team, and evaluated to correct the condition or situation, if it is deemed that any exist.

Employee screening

We screen our employees by:

- Upon arrival on campus or worksite, employees will need to check-in with your administrator or direct supervisor to verify these questions and then have a temperature check.
- Daily health self assessments must be conducted by each employee from home and verify immediately upon reporting to the worksite.
- Once on site, staff is to check in with their site administrator or direct supervisor each day upon arrival to their school site.
- Staff Self-Assessment and On-Site Screening:
 - Please answer the following with a Yes/No, if any responses are Yes, please contact your direct supervisor immediately.
 - Are you experiencing any symptoms such as current or recent fever (100.40 or higher), new or worsening cough, new or worsening shortness of breath or respiratory illness, sudden lack of taste or smell, sudden onset of unexplained gastrointestinal illness?
 - Have you been in close contact with anyone who has been diagnosed with COVID-19 or who is experiencing symptoms of COVIDS-19?
 - Have you traveled outside of the continental United States within the past 10 days? Upon arrival on campus or worksite, you will need to check-in with your administrator or direct supervisor to verify these questions and then have a temperature check.

- Contact the Human Resources Department for further instructions

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: Inspections will be conducted bimonthly to survey for any unreported potentially unsafe or unhealthy conditions. Once an unsafe or unhealthy work condition, practice or procedure is reported to the administration, a member of the administration team will assess the issue for severity and report to the superintendent the result. If the situation calls for instant resolve, the administrative investigator will make the executive decision to correct the situation immediately, and report to the superintendent after immediate correction. If the situation requires immediate attention within the working day, the administrative investigator will contact the superintendent, reporting the results and requesting a decision be made to implement correction. The administrative investigator will then oversee and/or enact the correction. If the situation requires attention but does not reflect an unsafe or hazardous work condition, the administrative investigator will review the condition and report it to the superintendent. The administration will meet within 72 hours to establish a plan of action for correction, and the original administrative investigator will oversee correction of the situation.

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:

- 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.

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 all students, staff, visitors, contractors, and anyone else requiring entrance to the campus. These face coverings are readily available and free of charge to the person requiring the face covering. These face coverings are new when provided and disposable, as to lessen exposure to potential contact with the virus. When employees recognize a non-employee not wearing a mask or face covering, the person(s) is advised that face coverings are required while on the campus, and the person(s) will be provided a face covering immediately.

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:

- Desks have been removed from classrooms to allow for 6' distance between students
- Solid individual partitions are installed on all student and teacher work stations.

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

- The District has purchased and installed Rabbit HEPA Air Filtration systems in all classrooms and common areas throughout the District.
- Ensuring our HVAC system is regularly maintained in all occupied buildings.
- Ensuring the MOT staff continues to monitor the efficiency and effectiveness of the units. Ensuring HVAC filters are changed as necessary and within the specified time frame before the life of the filter is extended past the appropriate time frame.
- Monitor MOT records that reflect the usage of efficient and up to date filtration within the ventilation system.
- When feasible, windows and doors are open to allow for cross-ventilation.

Cleaning and disinfecting

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

- All necessary cleaning and disinfecting supplies are ordered in a timely manner and to the best of our ability and supply ability.
- All necessary cleaning and disinfecting supplies are made available to all appropriate staff for use.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Daily cleaning and disinfection by custodial staff using products approved for use against COVID-19 on the EPA-approved list.
- Cleaning between AM/PM sessions of all high touch areas throughout the District.
- Ensuring MOT and related staff are trained on current and best practices for cleaning and disinfecting to prevent the spread of COVID-19.
- Administration will continually update staff about current frequency and scope of cleaning and disinfecting procedures as new procedures become available.

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

- The area used by the COVID-19 case will be closed off from use.
- Doors and windows will be opened, if possible, to increase air circulation.
- The affected area will be left vacant for a minimum of 24 hours before cleaning.
- All areas used by the COVID-19 case will be cleaned and disinfected.
- Only disinfecting products approved for use against COVID-19 on the EPA-approved list will be used.
- Soft surfaces will be misted using an electrostatic sprayer.
- If more than seven days since the COVID-19 case visited or used the affected area, additional cleaning and disinfection is not necessary.

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:

- Use of a cleaning/sanitizing crew daily
- Using EPA-approved products to disinfect shared items and workspaces
- Using hand sanitizer before and after each use.

Hand sanitizing

In order to implement effective hand sanitizing procedures, the District will:

- Install hand sanitizing stations in all classrooms and common areas.
- Evaluate handwashing facilities.
- Determine the need for additional facilities.
- Encourage staff to wash hands as frequently as possible.
- Provide employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e. 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.

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 excluded from the worksite and interviewed to establish:

- Dates they have been at the work site
- Dates COVID-19 case tested positive or first experiences symptoms
- With whom they have been in contact

The District will respond to COVID-19 cases by:

- Notifying all staff who have been at the worksite with the qualified individual during the infectious period
- Encouraging COVID-19 testing to exposed employees, provided at no cost to the employee and during working hours
- Investigating whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what can be done to reduce exposure
- Cleaning and disinfecting all areas the qualified individual has been to help prevent the spread of the virus
- Notifying Glenn County Public Health, if applicable
- Notifying Cal/OSHA, if applicable
- All employee COVID-19 cases will be reported to workers' compensation claims department

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 the administration immediately, as well as any possible hazards to be investigated. Reporting can be done through any medium and will be kept

as anonymous as reasonably possible.

- 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 are encouraged to test at any time they see fit even if not required. Information about where to test as well as other health resources can be referenced by the employee at any time by calling the information hotline phone number listed on the back of their insurance card.
- 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. This required testing will be at no cost to the employee, and the employee will be referred to call the information hotline listed on the back of their insurance card in order to obtain information regarding where they will be able to obtain a test at no cost to the employee. If the employee cannot access the insurance hotline or insurance is unavailable to the employee, the employee will be provided a list of community testing sites available at no cost to them. This list will be provided by the district administration's human resources representative during normal business hours. The affected employees will not have any portion of their leave balance deducted for testing of COVID-19 in response to a potential exposure or outbreak.
- 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.

After a confirmed COVID-19 case has been identified, the District will provide a written notice, within one business day, to all employees, and employers of subcontracted employees, who were on the premises as the qualifying individual within the infectious period that they may have been exposed to COVID-19, in a manner the employer normally uses to communicate employment-related information, typically via email.

Notification must include information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws:

- Available sick leave/paid time off
- Negotiated Provisions
- Workers Compensation

Notification must include information on the disinfection and safety plan that the District plans to implement and complete per the guidelines of the federal Centers for Disease Control and also working closely with Glenn County Public Health as soon as the District is notified of a positive case.

Confidentiality:

Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. The District will ensure that all employee COVID-19 medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace. Exceptions to this include: Unredacted medical records shall be provided to Glenn County Public Health, CDPH, Cal/OSHA or as otherwise required by law immediately upon request.

This provision does not apply to records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

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 facecoverings.
- 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 10 days (or current accepted timeframe following Glenn County Public Health recommendation) 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.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Email our JPA within 3 business days when it is known by administrative or HR staff that an employee has tested positive for COVID-19 (to assist the district in tracking and determine if an outbreak has occurred).
 - Include information such as: the date the employee's COVID-19 test was taken, the address(s) or locations where the employee worked during the 10 days prior to the date the test was taken and whether or not the employee believes their positive test was work related.
- 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 10 days from the time the order to quarantine was effective or accepted timeframe following Glenn County Public Health or California Department of Public Health recommendation.
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Superintendent

Title of Owner or Representative

A handwritten signature in blue ink, appearing to read "G. Powell", is written over a horizontal line. The signature is stylized and cursive.

Signature

February 1, 2021

Date

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			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
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:

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:

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

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

Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.

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

Major COVID-19 Outbreaks

This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.

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**.