

COVID-19 Prevention Program (CPP)
Orange Lutheran High School, 2222 N Santiago Blvd, Orange, Ca 92867

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

Date: January 25, 2022

Authority and Responsibility

Chief Operating Officer is the Prevention Plan Manager who 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.

I. Prevention Plan Manager

Has the overall responsibility for the implementation, documentation, maintenance, and review of the Prevention Plan at this location. Additional Prevention Plan Manager Responsibilities include ensuring the following:

- A. Train and communicate with all employees and employee representatives on all aspects of the site Prevention Plan.
- B. Conduct prevention plan evaluations of the office workspace to ensure compliance with the plan, ensure all protocols are in place and being enforced.
- C. Ask any employee, subcontractor, or vendor who is observed not following these ORANGE LUTHERAN HIGH SCHOOL safety measures to leave the site immediately and make proper follow-up notifications.
- D. Document and correct any deficiencies identified during prevention plan evaluations or upon notification or observance of any recognized deficiencies.
- E. Ensure all COVID-19 illnesses are investigated upon notification to determine and identify work-related factors that may have contributed to the infection.
- F. Update the plan as needed to mitigate potential exposures following the investigation effort.
- G. Implement corrective steps when physical distancing is not possible and potentially exposes employees for 15 or more minutes or employees come into contact or close proximity (within 6 feet) of infected employees or persons.

II. Managers and Supervisors

- A. Implement the policy with their staff.
- B. Require sick workers/employees – and those displaying flu-like symptoms – to stay home. (“Worker/Employee” means worker or employee for the ORANGE LUTHERAN HIGH SCHOOL subcontractors, designers, consultants, etc.)
- C. Send employees home immediately who show signs and symptoms of flu-like or acute respiratory illness symptoms
- D. Ensure hand sanitizer and appropriate protective gloves are made available throughout each site and office, as necessary.
- E. Encourage respiratory etiquette, including covering mouth and or nose when coughing and/or sneezing. Cover the mouth and nose with a tissue. If a tissue is not immediately available cough or sneeze into your sleeve, not your hands.
- F. Post additional signage throughout office location and work areas to raise awareness.
- G. Use daily task analysis or job hazard analysis forms to communicate the seriousness of this situation and the protection measures necessary.

- H. Ensure routine cleaning of frequently touched surfaces including the following: door handles, elevator buttons, all surfaces, equipment, and tool handles.
- Hand wipes are provided
 - Handwashing will be encouraged and sanitizer will be provided.
 - Masks are available and will be recommended while inside the building.
 - Rotate work schedules where appropriate and possible. Appropriate schedules could include: a. Staggered start and ending times
 - AM/PM schedule
 - Alternating days
 - Eliminate physical greetings such as a handshake or hug.
 - Encourage personnel to use the stairs, not the elevator unless personal health or disability prohibits the practice.
 - Limit the number of individuals riding in an elevator and ensure the use of face coverings. Post signage regarding these policies.

III. **Employees**

- A. Follow all aspects of the established COVID-19 policies published in Quicklinks..
- B. Adhere to all Manager and Supervisor responsibilities for protection guidelines.
- C. Conduct a self-assessment each day before coming to campus, using the checklist provided in Quicklinks.

Identification and Evaluation of COVID-19 Hazards

We implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace including:
 - COVID-19 Vaccination Policy
 - COVID-19 Employee Training and Daily COVID-19 Self-Assessment Policy
 - Daily Self-Assessment Checklist
 - Exposure Response Plan
 - Illness Response Plan
 - Face Covering Policy
 - COVID-19 Workplace Visitor Policy
 - COVID-19 Travel Policy
 - COVID-19 Employee Training Follow Up and Review
 - COVID-19 Testing Plan
 - COVID-19 Testing Resources
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- 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 and evaluate 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Submitting a ticket through our ticketing system with a request or concern.

Employee screening

We screen our employees and respond to those with COVID-19 symptoms by: self-evaluation for mild to moderate symptoms related to COVID-19 or other respiratory illness including sore throat, runny nose, fever (CDC states 100.4 Fahrenheit and above is considered a high temperature), chills, not feeling well, sneezing, and coughing.

Scenario #1: If an Employee Answers No to all Questions on Health Self-Assessment

- Any employee who answers “no” to all daily health self-assessment questions will be allowed to stay at work as long as the daily answers are “no.”

Scenario #2: If an Employee is Sick or Shows Signs of Illness

- If an employee calls in sick they will be required to stay home, contact their healthcare provider, and determine course of treatment.
- Employees who appear to have symptoms (i.e., fever, cough, or shortness of breath) upon arrival at work or who become sick during the day will immediately be separated from other employees, students, and visitors and sent home.
- If an employee states they have COVID-19 or have been in close contact with someone who has COVID-19 they need to isolate according to the OCHCA Self- Isolation and Self-Quarantine

Correction of COVID-19 Hazards

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

- The severity of the hazard will be assessed, and correction time frames assigned, accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and recommend universal indoor masking for all students, staff, teachers, and visitors, regardless of vaccination status.

Any employee not wearing a face covering should be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

Engineering controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by:

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat, wildfire smoke, or when the EPA Air Quality Index is greater than 100 for any pollutant we send students and employees home.
- Service plan with our HVAC agency that replace filters and does inspections quarterly
- portable HEPA filtration systems have been installed in all classrooms and shared office spaces to reduce the risk of COVID-19 transmission.

Cleaning and disinfecting

Performing thorough cleaning on high traffic areas such as break rooms and lunch areas, and areas of ingress and egress including stairways, stairwells, escalators, handrails, and elevator controls. Frequently disinfecting commonly used surfaces including doorknobs, toilets, and handwashing facilities. We implement the following cleaning and disinfection measures for frequently touched surfaces and objects:

- A schedule has been set to inspect bathrooms three times daily for hazards and low supplies.
- The facilities is cleaned and disinfected six nights per week.
- Employees have been notified of the frequency and scope of cleaning and disinfection.

In the event there is a confirmed case of COVID 19, procedures will be addressed towards identifying any area(s) that have potential contamination. The School may work with industrial cleaning companies and/or Maintenance and Operations, to disinfect the area following CDC guidance. Depending on the area(s) that may require disinfection, the specific work may need to be temporarily shut down to allow for the proper cleaning and to disinfect the area(s) of potential contamination. Additional disinfection protocols include but are not limited to:

- Providing time for workers to implement cleaning practices during their shift
- Time for regular thorough cleaning and disinfection of office spaces will be provided for employees.
- Employees are to avoid sharing phones, other work supplies, or office equipment wherever possible and must NEVER share PPE.
- Sanitary facilities will stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer, when needed.
- Cleaning chemical use will adhere to products approved for use against COVID-19 on the Environmental Protection Agency (EPA)-approved list and follow product instructions. Use disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface. Provide employees training on manufacturer's directions and OSHA requirements for safe use. Workers using cleaners or disinfectants should wear gloves as required by the product instructions.
- Where feasible the School will install portable high-efficiency air cleaners, improve central air filtration to the MERV-10 or the highest compatible with the filter rack, and seal edges of the filter to limit bypass, and make other modifications to increase the quantity of outside air and ventilation in offices and other spaces.

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 section 3380, and provide and ensure use of such PPE, as needed.

Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person.

Testing of symptomatic employees

We make COVID-19 testing available at no cost to all employees who had close contact in the workplace and have COVID-19 symptoms, during employees' paid time.

Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using the COVID-19 *Illness Inquiry Form* or COVID-19 *Exposure Inquiry form*, as needed.

- We also ensure the following is implemented:
 - Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees, independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the high-risk exposure period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c).
- We consider a “close contact” that meets the definition as described in section 3205(b)(1) definition; “high-risk exposure period” meets the section 3205(b)(10) definition; and “worksite” meets the section 3205(b)(12) definition]

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, possible close contacts and hazards to, and how.
 - All potential exposures and those who are experiencing symptoms have been instructed to notify their supervisor and Human Resources as soon as possible. For potential exposure cases, an exposure inquiry questionnaire is sent to the employee where information is gathered regarding the employee's potential exposure.
 - All employees experiencing symptoms must report this to their supervisor and Human Resources as soon as possible. For illness cases, an illness inquiry questionnaire is sent to the employee where information is gathered to determine any close contacts and the high risk exposure period.
- How employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations by using our ADA Request for Accommodation procedure.
- Access to COVID-19 testing is provided to employees at no cost to employees at a specified location

Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and allow for participation in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical

distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.

- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained on:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who were up to date with their vaccine before the close contact and who do not develop COVID-19 symptoms, provided they wear a face covering and maintain six feet of physical distance from others in the workplace for 14 days following the last date of close contact.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the initial onset of COVID-19 symptoms, provided they wear a face covering and maintain six feet of distance from others in the workplace for 14 days following the last date of close contact.
 - COVID-19 cases who returned to work per our return-to-work criteria who never developed COVID-19 symptoms do not need to be excluded from the workplace for 90 days after the first positive test, provided they wear a face covering and maintain six feet of distance from others in the workplace for 14 days following the last date of close contact.
- If we do not exclude an employee who had a close contact as permitted by the above three exceptions, we will provide the employee with information about any applicable precautions recommended by CDPH for individuals with close contact.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by tracking their symptoms and days they were unable to work remotely and then providing 2022 SPSL as deemed appropriate, per the employee's request.
- 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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 our Quarantine Tracker Spreadsheet to keep a record of and track all COVID-19 cases.


Return-to-Work Criteria

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
 - COVID-19 symptoms have improved, and
 - If the employee cannot or declines to test they can return to work after 10 days.
- **COVID-19 cases who tested positive but never developed symptoms** will not return to work until a minimum of 5 days have passed since the date of specimen collection of their first positive COVID-19 test and a negative test at day 5 or later.
Persons who had a close contact may return to work as follows:
 - Close contact but never developed symptoms:
 - Five days have passed since the last known close contact and have a negative test on day five and the person wears a face covering and maintains six feet of physical distance from others while at the workplace for 10 days following the last date of close contact.
 - Close contact with symptoms: when the “COVID-19 cases with symptoms” criteria (above) have been met.
- If an order to isolate, quarantine, or exclude 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.

Signed and Approved by Chief Executive Officer:



 Dr. Mary K. Scott



 Date

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, trainings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing stationary work.

Person conducting the evaluation:

Date:

Name(s) of employee and authorized employee representative that participated:

| Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards | Places and times | Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers | Existing and/or additional COVID-19 prevention controls |
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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 | | | |
| Ventilation* (amount of fresh air and filtration maximized) | | | |
| Additional room air filtration* | | | |
| Clean filters every 3-6 months based on usage | | | |
| Administrative | | | |
| Surface cleaning and disinfection 6 nights a week | | | |
| Hand washing facilities available outside and inside | | | |
| Disinfecting and hand sanitizing solutions being used according to manufacturer instructions | | | |
| Exposure Controls | Status | Person Assigned to Correct | Date Corrected |
| PPE (available) | | | |
| Face coverings (disposable) | | | |
| Gloves | | | |
| Face shields/goggles | | | |
| Respirators | | | |
| All our ventilation systems use fresh air. Quarterly filter changes are conducted | | | |

Appendix C:

COVID-19 Prevention in Employer-Provided Transportation

Assignment of transportation

To the extent feasible, we reduce exposure to COVID-19 hazards by assigning employees sharing vehicles to distinct groups and ensuring that each group remains separate from other such groups during transportation, during work activities, and in employer-provided housing. We prioritize shared transportation assignments in the following order:

- Employees working in the same crew or workplace are transported in the same vehicle.
- Employees who do not share the same household, work crew or workplace are transported in the same vehicle only when no other transportation alternatives are feasible.

Face coverings and respirators

We ensure that the:

- Face covering requirements of our **CPP Face Coverings** are followed for employees waiting for transportation, if applicable.
- All employees are provided with a face covering, which must be worn unless an exception under our **CPP Face Coverings** applies.

Cleaning and disinfecting

We ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned to prevent the spread of COVID-19 and are cleaned and disinfected if used by a COVID-19 case during the high-risk exposure period, when the surface will be used by another employee within 24 hours of the COVID-19 case.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, will be used by another employee within 24 hours of the COVID-19 case. We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

Ventilation

We ensure that vehicle windows are kept open, and the ventilation system is set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and excessive outdoor heat would create a hazard to employees.

Hand hygiene

We provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.