

# COVID-19 Prevention Program (CPP)

## Alisal Union 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

Jim Koenig, 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.

Once a Covid-19 case is identified in addition to the disinfection, an inspection is done to ensure all safety measures are being applied.

### Employee Participation

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

Staff is required to constantly evaluate their workstations or areas of work for potential hazards. Periodic inspections of work areas are conducted by the appropriate staff.

## **Employee Screening**

We screen our employees by:

All employees are required self-screen according to CDPH guidelines. All sites and departments have been equipped with non-contact thermometers in the area of entry. All employees are required to take temperature at the time of ingress and record it on a spreadsheet.

## **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:

Upon identifying a hazardous condition it must be reported to the site or department administrator. A work order will be submitted to the maintenance department. The maintenance department will then inspect the problem area immediately and create a corrective action plan timeline depending on the severity of the issue. In addition the HR Director is also informed of the hazardous concern and will conduct an inspection along with the appropriated department. If the district staff cannot solve the issue Keenan insurance will be contacted for a deeper inspection and will make a recommendation.

## **Controls of COVID-19 Hazards**

### **Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

Protective equipment will be provided for staff and students. This includes face shields, face masks, plexi-glass screens for teachers and staff. Physical distancing will be practiced throughout all areas at school sites and district offices/departments. All staff that can telework will be required to maximize their work from home. Access to our school sites will be limited to only staff and students. Parents and community will be informed related to the district safety protocols. All sites have been equipped with proper social distancing signage throughout the campus.

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 required in the work place by all employees and visitors. The district has provided all employees with disposable surgical masks and face shields. All sites/departments have been supplied with extra face coverings to

provide to staff or visitors that need it. When inventory is running low at the site/department a supply can be requested from the Maintenance Department.

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:

All work stations have been equipped with solid partitions.

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

All HVAC equipment is inspected regularly and repaired if necessary. The filtering system is changed every 3 months or as necessary. If equipment is not operating properly a certified employ provides service. The air flow and quality is inspected periodically and randomly. The systems are upgraded and up to code based on life of HVAC. In addition we have purchased portable air purifiers for each classroom, common area and office space.

### **Cleaning and disinfecting**

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

Custodians clean all areas including high usage areas nightly. In addition, custodians disinfect frequently and as needed. All staff has access to disinfectants and cleaners when requested.

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

Upon entering a room custodial staff is equipped with PPE and the proper equipment and chemicals. The custodial team will use a mister to spray the room, wipe down areas, vacuum and shampoo if needed.

### **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:

Where there must be sharing, the items will be disinfected between uses by the custodial staff. The goal is not have common use of tools or instruments.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

Hand sanitizer will be used under the direct supervision of an adult. When ordering the product we will ensure to purchase the product without methanol. Signage for hand-washing is posted throughout the campus and will be highly encourage.

### **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. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

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:

Inform all employees on how they can obtain testing. This could be through the employer, local health department, a health plan, or at a community testing center. Offer testing to an employee at no cost and during working hours in the event of a potential COVID-19 work-related exposure. Provide periodic (at least weekly or twice per week depending on the magnitude of the outbreak) COVID-19 testing to all employees in an "exposed workplace" during an outbreak. Testing must be provided in a manner that ensures employee confidentiality.

## **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:

The district has assigned a district administrator to be the sole contact for the reporting of COVID-19 symptoms or exposure. Employees will make contact and instructed on steps to follow. The district administrator will initiate contact tracing and instruct employees of necessary actions based on exposure and contact. The district administrator will then inform the site/department of the case and send out a letter to all staff informing them of an identified case in their work place. The district administrator manages a confidential Covid Staff case spreadsheet that is shared with the Superintendent and cabinet members. The district administrator will notify employees of any potential exposures within one business day (and notifying any other employer who has potentially exposed employees in the workplace), offer testing to potentially exposed employees at no cost and during working hours, investigate the exposure, whether workplace conditions could have contributed to the risk of exposure, and what corrections would reduce exposure.

- 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:

The employer may provide testing to employees at a testing site separate from their work location. Employees incur no cost for the testing. Ensuring that an employee does not incur costs would include paying employees' wages for their time to get tested, as well as travel time to and from the testing site. It would also include reimbursing employees for travel costs to the testing site (e.g., mileage or public transportation costs). These terms, as used in the regulations, mean that the test must be provided during paid time.

- 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.

## **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.

Information on screening at home for any symptoms and temperature screening upon entering the building. Staff is also made aware of proper ventilation like opening windows to provide airflow if appropriate. Staff is also being provided training on the portable air purifiers placed in different work spaces.

**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

Currently we are permitting employees to quarantine while teleworking so it won't affect earnings and seniority.

- 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.

In addition when a case is identified at a site or department a memo indicating a case has been identified is provided to all staff members of the site/department affected.

**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.

Jim Koenig

**Title of Owner or Top Management Representative**

**Signature**

**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, 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 fixed work locations.

**Person Conducting the Evaluation:** Monica Anzo

**Date:** May 2020

**Name(s) of Employees and Authorized Employee Representative that Participated:**

George Anzo, Richard Gomez, Christina Palmer, Irene Vargas, Tina Wallace, Clemente Villarreal, Susan Ratliff, All site principals

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, including barriers, partitions and ventilation
Ingress and Egress Facilities	Cafeteria, Front Office, Classrooms before and after school and during meals	Employees and members of the public, students	Personal Protective Equipment (PPE) Signage and posters for 12 school sites, district office and district departments
Work Stations	Office space, Classrooms, Cafeteria Distribution	Employees and members of the public, students	PPE Plexiglass barriers for all office staff/ teachers
Work Stations, large rooms, classrooms	Office space, Classrooms, Cafeteria	Employees and members of the public, students	Air purifiers (to ensure clean air in classrooms and offices)



## Appendix B: COVID-19 Inspections

**Date:** On-going

**Name of Person Conducting the Inspection:** George Anzo

**Work Location Evaluated:** School site (classrooms and office space), District Office Space

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/Partitions	Good Condition		
Ventilation (amount of fresh air and filtration maximized)	Good Condition		
Additional room air filtration	Good Working Condition		

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Administrative</b>			
Physical distancing	Adequate		
Surface cleaning and disinfection (frequently enough and adequate supplies)	Adequate		
Hand washing facilities (adequate numbers and supplies)	Appropriate		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Adequate		

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)	Inventory is adequate		
Gloves	Inventory is adequate		
Face shields/goggles	Inventory is adequate		
Respiratory protection	Inventory is adequate		

## 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:** January 24, 2021

**Name of Person Conducting the Investigation:** Christina Palmer

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

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

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

**Appendix D: COVID-19 Training Roster**

**Date:**

**Name of Person Conducting the Training:**

Employee Name	Signature