COVID Prevention Program (CPP)
Injury Illness Prevention Program Addendum

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

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 evaluation of COVID-19 hazards by: participating in the walk-though with the Loss Control Analyst.

Employee screening

We screen our employees by: having them self-screen according to the CDPH guidelines, using the Catapult website/app to check-in daily prior to reporting to work. In addition, all employees are required to take their temperature on-site using the non-contact thermometers at each check-in station located on the site.

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:

All COVID-19 hazards, will be reviewed by the Site Safety Coordinator as quickly as possible and no later than 72 hours. If a hazard poses extreme safety concerns, it will be reviewed immediately. After inspection, a report will be provided to the employee that will address the corrective action, estimated completion date and the person responsible for the correction. The Loss Control Analyst will be provided a copy of the report and will follow-up to ensure timely correction.

Control of COVID-19 Hazards

Physical Distancing

The District will prioritize minimizing contact between adults at all times. Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- Conducting all staff meetings, professional development training and education, as well as other activities involving staff with physical distancing measures in place, outside, or virtually, where physical distancing is a challenge.
- Minimizing the use of and congregation of adults in staff rooms, break rooms and other settings.
- Using 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 where required by orders from the [California Department of Public Health (CDPH)](#) or local health department. Employees may use their own face coverings. Face coverings are provided to all employees should they forget their own. The board has adopted [Administrative Regulation 5132.1](#) Student Mask and Face Covering that addresses non-compliance.

In limited situations where a face covering cannot be used for pedagogical or developmental reasons, a face shield with a drape can be used instead of a face covering while in the classroom as long as the wearer maintains physical distance from others. Staff must return to wearing a face covering outside of the classroom.

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.
- 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.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between staff members: Sneeze guards have been installed across campuses in areas where 6 feet cannot be maintained

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

- When the amount of outside air needs to minimized due to other hazards, such as heat and wildfire smoke, stand-alone portable HEPA filters have been provided to each classroom.
- The ventilation system will be maintained and adjusted as needed to provide the optimal

air exchanges with the existing ventilation system.
- The District will install MERV 12 filters in all areas that can accommodate them, based on the analysis conducted by the HVAC specialist.

Cleaning and disinfecting

Frequent disinfection can pose a health risk to children and students due to the strong chemicals often used and so is not recommended in the school setting unless a case has been identified. We implement the following cleaning and disinfection measures for frequently touched surfaces:

- Daily cleaning of frequently touched surfaces, ensuring adequate supplies and adequate time.
- A checklist is completed for each classroom/learning space to document the area was cleaned and/or disinfected.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: if feasible, we will wait 24 hours before the area is cleaned and disinfected by our trained custodial team. A notice will be placed on the door, informing staff once it's been cleaned and disinfected and ready for use.

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 providing staff with disinfectant wipes to be used to disinfect between uses. All staff have been trained and we will offer on-going training as well.

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:

- Added additional hand washing stations across all campuses.
- Provided hand sanitizer to every classroom/office.
- Encouraged employees to wash their hands for at least 20 seconds each time.

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

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.

Investigating and responding to student COVID-19 cases will be done by Tiffany Hazelwood. Investigating and responding to staff COVID-19 cases will be done by Tina Peterson. Questions that are asked during the investigation are included in **Appendix C: Investigating COVID-19 Cases**. Anyone found to be in close contact (within six feet for 15 or more within a 24 hour period), will be contacted via phone call. Anyone that was not a close contact but on the same site, will receive a courtesy notification via mail or email.

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

- Offered COVID-19 testing at no cost during their working hours. The school employee only testing facilities have been provided by Human Resources.
- Provided information on benefits described in the following sections entitled "Training and Instruction", and "Exclusion of COVID-19 Cases".

If students have been exposed to someone with COVID-19 while on-campus (i.e., a close contact) the District will encourage them to get tested through their personal medical provider or through a District provided testing center with UCSD. Students will be advised that they must quarantine for 14 days from the date of exposure and are excluded from coming on-campus during that period; they will be advised to seek further guidance from their medical provider as well.

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. Daily check-in using the Catapult website/app is required. Symptoms should be reported to your supervisor and Tina Peterson, Human Resources Director. Possible hazards should be reported to the School Safety Coordinator.
- 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. School Employee Only testing sites have been provided by Human Resources.
- 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.

Training is documented via our online JPA learning library.

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 an employee was exposed to COVID-19 in the workplace and is able and available to work. This will be accomplished through use of available leaves and other rights afforded to employee under applicable law, Board Policy/Administrative Regulation, and/or collective bargaining agreement.
- Providing employees at the time of exclusion with information on available benefits.

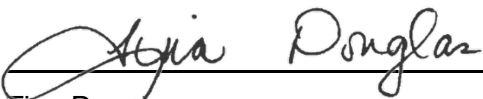## Reporting, Recordkeeping, and Access

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.
- Human Resources keeps a record of and tracks 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. A [COVID-19 Dashboard](#) is posted on our website and provides up to date information on positive cases on our campuses.

Return-to-Work Criteria

- COVID-19 cases who tested positive and developed 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.

Tina Douglas   01/29/2021

Tina Douglas   Date
Assistant Superintendent, Business Services

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: **Gordon Plotzke, Loss Control Analyst**

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, including barriers, partitions and ventilation

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 (sneeze guards)			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection			
Hand washing facilities			
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			

Appendix C: Investigating COVID-19 Cases

The following data points are collected when investigating COVID-19 Cases.

1. Employee (or non-employee*) name
2. Occupation (if non-employee, why they were in the workplace)
3. Location where employee worked (or non-employee was present in the workplace)
4. Date investigation was initiated
5. Was COVID-19 test offered?
6. Name(s) of staff involved in the investigation
7. Date and time the COVID-19 case was last present in the workplace
8. Date of the positive or negative test and/or diagnosis
9. Date the case first had one or more COVID-19 symptoms
10. Information received regarding COVID-19 test results and onset of symptoms (attach documentation)
11. 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)
12. 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.
13. Date notice was given
14. Names of employees that were notified
15. Independent contractors and other employers present at the workplace during the high-risk exposure period.
16. Date they were present at the workplace
17. Names of individuals that were notified
18. What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
19. What could be done to reduce exposure to COVID-19, if anything?
20. Was local health department notified?
21. Date the local health department was notified

COVID-19 School Guidance Checklist

January 14, 2021

Date: _____

2021 COVID-19 School Guidance Checklist

Name of Local Educational Agency or Equivalent: _____

Number of schools: _____

Enrollment: _____`

Superintendent (or equivalent) Name: _____

Address: _____

_____

Date of proposed reopening:

_____

County: _____

Current Tier: _____
(please indicate Purple, Red, Orange or Yellow)

Type of LEA: _____

Phone Number: _____

Email: _____

Grade Level (check all that apply)

☐ TK   ☐ 2nd ☐ 5th ☐ 8th ☐ 11th

☐ K   ☐ 3rd ☐ 6th ☐ 9th ☐ 12th

☐ 1st   ☐ 4th ☐ 7th ☐ 10th

This form and any applicable attachments should be posted publicly on the website of the local educational agency (or equivalent) prior to reopening or if an LEA or equivalent has already opened for in-person instruction. For those in the Purple Tier, materials must additionally be submitted to your local health officer (LHO), local County Office of Education, and the State School Safety Team prior to reopening.
The email address for submission to the State School Safety for All Team for LEAs in Purple Tier is:
K12csp@cdph.ca.gov
LEAs or equivalent in Counties with a case rate >=25/100,000 individuals can submit materials but cannot re-open a school until the county is below 25 cases per 100,000 (adjusted rate) for 5 consecutive days.

For Local Educational Agencies (LEAs or equivalent) in ALL TIERS:

☐ I, _____, post to the website of the local educational agency (or equivalent) the COVID Safety Plan, which consists of two elements: the **COVID-19 Prevention Program (CPP),** pursuant to CalOSHA requirements, and this **CDPH COVID-19 Guidance Checklist** and accompanying documents,

which satisfies requirements for the safe reopening of schools per CDPH [Guidance on Schools](). For those seeking to open while in the Purple Tier, these plans have also been submitted to the local health officer (LHO) and the State School Safety Team**.**

I confirm that reopening plan(s) address the following, consistent with guidance from the California Department of Public Health and the local health department:

☐ **Stable group structures (where applicable):** How students and staff will be kept in stable groups with fixed membership that stay together for all activities (*e.g.*, instruction, lunch, recess) and minimize/avoid contact with other groups or individuals who are not part of the stable group.

Please provide specific information regarding:

How many students and staff will be in each planned stable, group structure? (If planning more than one type of group, what is the minimum and maximum number of students and staff in the groups?)

_____

If you have departmentalized classes, how will you organize staff and students in stable groups?

_____

If you have electives, how will you prevent or minimize in-person contact for members of different stable groups?

_____

☐ **Entrance, Egress, and Movement Within the School:** How movement of students, staff, and parents will be managed to avoid close contact and/or mixing of cohorts.

☐ **Face Coverings and Other Essential Protective Gear:** How CDPH's face covering requirements will be satisfied and enforced for staff and students.

☐ **Health Screenings for Students and Staff:** How students and staff will be screened for symptoms of COVID-19 and how ill students or staff will be separated from others and sent home immediately.

☐ **Healthy Hygiene Practices:** The availability of handwashing stations and hand sanitizer, and how their safe and appropriate use will be promoted and incorporated into routines for staff and students.

☐ **Identification and Tracing of Contacts:** Actions that staff will take when there is a confirmed case. Confirm that the school(s) have designated staff persons to support contact tracing, such as creation and submission of lists of exposed students and staff to the local health department and notification of exposed persons. Each school must designate a person for the local health department to contact about COVID-19.

☐ **Physical Distancing:** How space and routines will be arranged to allow for physical distancing of students and staff.

Please provide the planned maximum and minimum distance between students in classrooms.

Maximum: _____feet

Minimum: _____feet. If this is less than 6 feet, please explain why it is not possible to maintain a minimum of at least 6 feet.

_____

☐ **Staff Training and Family Education:** How staff will be trained and families will be educated on the application and enforcement of the plan.

☐ **Testing of Staff:** How school officials will ensure that students and staff who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic staff testing cadence.

Staff asymptomatic testing cadence. Please note if testing cadence will differ by tier:
_____ however surveillance testing is in place. _____

☐ **Testing of Students:** How school officials will ensure that students who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic student testing cadence.

Planned student testing cadence. Please note if testing cadence will differ by tier:
_____

☐ **Identification and Reporting of Cases:** At all times, reporting of confirmed positive and suspected cases in students, staff and employees will be consistent with [Reporting Requirements](#).

☐ **Communication Plans:** How the superintendent will communicate with students, staff, and parents about cases and exposures at the school, consistent with privacy requirements such as FERPA and HIPAA.

☐ **Consultation: (For schools not previously open)** Please confirm consultation with the following groups

    ☐ Labor Organization

        Name of Organization(s) and Date(s) Consulted:

            Name: _____

            Date: _____

    ☐ Parent and Community Organizations

        Name of Organization(s) and Date(s) Consulted:

            Name: _____

            Date: _____

If no labor organization represents staff at the school, please describe the process for consultation with school staff:

_____
_____
_____
_____
_____

For Local Educational Agencies (LEAs or equivalent) in <u>PURPLE:</u>

☐ **Local Health Officer Approval:** The Local Health Officer, for (state County) _____. County has certified and approved the CSP on this date: _____. If more than 7 business days have passed since the submission without input from the LHO, the CSP shall be deemed approved.

<u>Additional Resources:</u>

[Guidance on Schools](#)

[Safe Schools for All Hub](#)

COVID-19 School Guidance Checklist (Attachment)

How many students and staff will be in each planned stable, group structure? (If planning more than one type of group, what is the minimum and maximum number of students and staff in the groups?)

Sunset High School has divided students into advisory groups. Each student has a teacher on campus who serves as his/her advisor. There are 8 advisors at Sunset. Currently, advisors have 13-16 students in their advisory groups. Students work out of their advisor's classroom for the duration of the day (four periods from 8:30 am to 12:45 pm) and they do not move from classroom to classroom. Students have the option of working from home or working in their advisor's classroom. Students may work on campus on Mondays, Tuesdays, Thursdays, and Fridays. Most students have elected to work from home on most days and most advisors have seen 1-3 students in their classroom on any given day. The advisor is the only staff member working out of their classroom.

COAST Academy has four teachers and, thus, four separate classrooms. COAST students have the option of working from home or in their teacher's classroom. Students in each classroom work out of the same classroom for the duration of the school day on Mondays, Tuesdays, Thursdays, and Fridays from 9:30 am to 3:00 pm each day. Each classroom has 10-12 students and 4-6 staff members. There is a maximum of 16 total individuals in a classroom.

If you have departmentalized classes, how will you organize staff and students in stable groups?

See answer above.

If you have electives, how will you prevent or minimize in-person contact for members of different stable groups?

Students and staff work out of the same classroom for the duration of the school day.