

Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OSHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - [3205, COVID-19 Prevention](#)
 - [3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks](#)
 - [3205.2, Major COVID-19 Outbreaks](#)
 - [3205.3, Prevention in Employer-Provided Housing](#)
 - [3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work](#)
 - The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for Echo Horizon School, Culver City, California

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

Date: January 11th, 2020

Authority and Responsibility

Peggy Procter 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.
- **Maintain the COVID-19 Compliance Team in a state of readiness to identify, evaluate and respond to all COVID-19 hazards in the workplace.**
- **The COVID-19 Compliance Team conducts weekly COVID-19 briefing to all Echo Horizon employees that include current COVID -19 information from the Department of Health, and the review of the current health and safety practices in our school.**

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **contacting their immediate supervisor or any member of the COVID-19 Compliance Team when a COVID-19 hazard has been identified. All employees can report any COVID-19 concern without fear of reprisal or retribution, and any reported concern will be addressed appropriately.**

Employee screening

We screen our employees by: following the CDPH(California Department of Public Health) employee screening guidelines. Each employee who reports to school campus will complete a Daily Self-Health Assessment prior to entering on to school grounds. Every employee is notified via a push notification (the Titan Health Screening App) each morning, to complete the self screening questionnaire prior to reporting to work. After completing the daily health assessment, the employee will be advised (via app) if they are cleared to report to work. If the employee is not cleared to report to work, the employee will inform their immediate supervisor and the school nurse for guidance. If an employee is cleared to report to campus, the employee (or school nurse)will perform a temperature screening, using a non-contact

thermometer when arriving on to the school campus(at the employee screening station). If the employee is afebrile, that employee will be cleared to report to their work duties. If an employee is unable to access the Titan Health Screening App, hardcopies of the Daily Self-Health Assessment questionnaire are available at the employee screening. All employees entering the school campus will be required to wear a face covering. Mask required signs are posted at every school entrance. If the school nurse performs the employee health or temperature screening, appropriate PPE will be worn, that includes a face covering and eye protection.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the of 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 in a timely manner by the COVID Compliance Team. Timeframes for correction will be assigned to the facilities team as well as the Health Coordinator accordingly. Individual employees will be responsible for any correction that is necessary to be in compliance with the health and safety protocols of the school. Follow up by the COVID Compliance Team and or Health Coordinator will be done in a timely manner to ensure that the corrective measures are completed. Documentation on the Appendix B worksheet will be completed for every suspected COVID-19 incident that occurs on school campus.

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:

- **Employees whose job functions do not require them to be on school campus or do not affect school operation will work remotely.**
- **School campus is open to instructional learning for TK-2nd grade students and students requiring special services. In addition, 25% of students in grade level 3-6 are included in the total number of students that are allowed to be on campus.**
- **Visitors are not allowed on campus unless the visit has been pre-scheduled and approved. Those potential qualified visitors include, parents with children and contractors conducting school business. All visitors who report to the school campus will perform a Self Health Assessment, including temperature screening with a non-contact thermometer prior to entering the building. The front office staff will verify the health screening is complete and grant the visitor access to the building. Visitors will sign in and out on the visitor log and will only be allowed to report to the area of the school in which they are to conduct their business.**
- **Floor markings are pre arranged at a 6' distance throughout the school building. Directional floor decals are fixed on the floors and staircases marking the directional pathways. Posted physical distancing signs are displayed throughout the school and in common areas.**
- **Employee occupancy limit signs are posted in common work areas, such as the break room, kitchen, supply and work room and posted on the elevator.**
- **All students will report to school via carpool only. The scheduled 30 minute drop off and pick up time will be coordinated by staff and faculty members. Students will only be allowed to exit the car when confirmation of a Student Health Screening has been completed prior to arrival, and a temperature screening with a non contact thermometer by a staff member. Each student exiting the car will immediately report to class. Staff and faculty members will be positioned outside the school and in hallways to ensure all students are abiding to the physical distancing protocols. At carpool pick up times, staff members will greet the parents on arrival and communicate via walkie talkie to the student's teacher that their parent has**

arrived. The student will exit the classroom and follow the floor marking and exit the building. Staff members will be positioned in the hallways to ensure that students are exiting out of the building safely.

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. [

Anyone entering school property(building and grounds) is required to wear a face covering.

All employees are given face coverings that include the Smile Mask, a Humanity Shield (face shield with a drape) and a medical grade disposable mask. These face coverings will be worn during school operations and while an employee is on school grounds. Employees may supply their own cloth face covering at their own expense, neck gaiters and one valve face mask will not be allowed on school campus.

Extra face coverings and shields are available at the front desk or in the supply closet. All masks/shields will be replaced by the school when the mask/shield has signs of degradation. Employees are responsible to maintain and clean their mask and shield daily. Proper handling and Mask care instructions are described in the face covering policy.

Employees that encounter other employees or non-employees that are not wearing a face covering are directed to contact their supervisor or the COVID Compliance Team for assistance.

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 who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: **Installing desk barriers for students' desks when 6' distance cannot be maintained. Installing desk barriers and partitions in workspaces that have shared office space.** We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- **The school HVAC system is in good, working order. The HVAC air filtration system has been upgraded to a MERV 13 to keep the air quality clean throughout the day. The MERV13 filters are being replaced on a quarterly basis per the manufacturer's instructions.**

In addition, the HVAC system will be running continuously while students and faculty are on campus. The HVAC system will run between the hours of 5am to 9pm, Monday through Friday before and after school hours. On the occasion that an event is scheduled at the school on the weekends, the HVAC

system will be adjusted to run two hours before the scheduled event and run for two hours after staff, student and faculty leave campus. The HVAC system settings will be controlled and managed by the facilities teams.

- Thermostats throughout the building are locked and only accessible by a designated key. Teachers and staff have the ability to control the temperature setting in each classroom or office, but do not have access to turn off the fans. The facilities team will ensure that the fans throughout the facility remain running during the school schedule, running times indicated above. HVAC systems are set to maximize indoor/outdoor air exchange unless outdoor conditions (recent fire, very high outside temperature, high pollen count, etc.) make this inappropriate.
- Portable, high-efficiency air cleaners have been installed in classrooms where ventilation is less adequate such as classrooms 108 and 129. The air filters have been placed in areas of the classroom where direct airflow does not blow directly from one person to another reducing the potential spread of droplets that may contain infectious viruses. Doors and windows are kept open during the school day if feasible and when outdoor conditions make this appropriate.
- Air filters have been upgraded to the highest efficiency possible.

Cleaning and disinfecting

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

- **The facilities team will ensure that supplies of cleaning and disinfectant are stocked at all times. This includes, individual bottles of disinfectant and alcohol wipes in every work space and classroom for individual use.**
 - **A routine cleaning and enhanced cleaning schedule has been established in order to avoid both under- and over- use of cleaning products. (See attached schedule)**
 - **Break rooms: will be routinely cleaned (cleaning supplies and disinfectant for regular surfaces) every day .Enhanced cleaning (with a registered disinfectant for viral/bacterial pathogens))of high touch areas will occur three times a day.**
 - **Doors frames and door handles**
 - **Sink fixtures**
 - **Counters**
 - **Tables tops**
 - **Coffee pots**
 - **Phones**
 - **Refrigerator door handle**
 - **Microwave**
 - **Arm rest of chairs**
 - **Light switches**

Restrooms: will be routinely cleaned and disinfected each day and high touch areas will be disinfected 3 times per day. High touch areas include;

- **Flush handles**
- **Doors frames and door handles**
- **Sink and sink fixtures**
- **Soap and towel dispensers**
- **Light switches**

- Kitchen: will be routinely cleaned each day and high touch areas will be disinfected 3 times per day. High touch areas include;
- Door frames and door handles.
- Sink fixtures
- Counters
- Tables tops
- Coffee pots
- Phone
- Refrigerator and freezer door handle
- Microwave
- Light switches

Classrooms or rooms occupied by students and staff will be routinely cleaned and disinfected during students recess and lunch breaks, and after school hours. The high touch areas will include;

- Desk or table tops
- Student chairs
- Door handles, door frames
- Sink and sink fixtures
- Light switches
- Hygiene dispensers
- Phones
- All items shared by students in the classroom will be placed in a dirty/used bin. Those items will be cleaned and disinfected after school hours and placed in the clean bin after they have been disinfected.
- Window will be opened in the classroom during times of enhanced cleaning.

Get Well Room: will be routinely cleaned each day and high touch areas will be disinfected 3 times per day. High touch areas include;

- Door knobs/handles
- Counter tops
- Chairs used by students who come into the Get Well Room will be disinfected after each child either by the nurse or office receptionist.
- Nursing Office or Isolation/ Quarantine Room: will be routinely cleaned each day and high touch areas will be disinfected after every student.
- High touch area include;
- Door knobs/handles
- Counter tops
- Phones
- Chairs or beds used by students who come into the Isolation/Quarantine Room will be disinfected after each use by the school nurse.
- All used blankets will be placed in a dirty bin and after each use.
- All disposable pillow covers will be thrown away after each use.

Counseling and other student support areas: will be routinely cleaned each day and high touch areas will occur 3 times per day. High touch areas include;

- Shared surfaces
- Door frame and door handles
- Front office: will be routinely cleaned each day and enhanced cleaning of high touch areas will occur 3 times per day. High touch areas include;

- Both counters outside the front offices
- Door frames and door handles
- Phones

Auditorium: will be routinely cleaned each day and high touch areas will be disinfected 3 times per day. High touch areas include;

- Door frames and door handles
- Table surfaces
- If the auditorium is used as a classroom, the cleaning will follow the routine cleaning and enhance cleaning as per classrooms.
- Library: the library space will be converted into a classroom setting and will be routinely cleaned once per day, after school hours. Enhanced cleaning of the high touch areas will occur when students are not present in the classroom. Enhanced cleaning during school hours will occur when the students are out at recess, during scheduled lunch hours and students after school hours. The high touch areas will include;
- Desk or table tops
- Student chairs
- Door handles, door frames
- Sink and sink fixtures
- Light switches
- Hygiene dispensers
- Phones
- Window will be opened in the classroom during times of enhanced cleaning.

Work Room: will be routinely cleaned each day and high touch areas will be disinfected 3 times a day. High touch areas include;

- Light switches
- Counter tops
- Tables
- Xerox machine and copier
- Cabinet door handles
- Sink fixtures
- Soap dispensers
- Laminating machine
- Door frames and door handles

Facility: will be routinely cleaned each day and high touch areas will be disinfected 3 times a day. High touch areas include;

- Door handles and door frames to all rooms throughout the building
- Door entryways and the front entrance, side entrance and yard entrances
- Stair railing
- Elevator buttons
- Student lockers

School Yard: : will be routinely cleaned and disinfected. This will include;

- Play structure
- Play equipment
- Table and benches

- Deep Cleaning will be scheduled after school hours on Friday each week. Deep cleaning will include every classroom, room and workspace that is occupied by students and staff.
- The product Isoklean will be used with the electrostatic sprayer to cover large spaces. The product is EPA registered and approved for killing bacteria and viruses, including the Coronavirus. The product will be used preventively every week to help mitigate the spread of the Coronavirus.
- All cleaning products used for disinfecting our classroom and school campus have been approved by the EPA as a N-list product, effective against the killing of the CoronaVirus.
- All employees have access to the daily cleaning and disinfection schedule and the schedule days for enhanced cleaning.
- Should we have a COVID-19 case in our workplace, we will implement the following procedures:
- Deep Cleaning measures with the electrostatic sprayer using the Isoklean product, will occur in spaces where a person suspected or confirmed with COVID case has occupied. Use of the all disinfecting products will follow the OSHA requirements for safe use as required by the Healthy Schools Act. (Infection Control Plan)
- All the Cleaning products used for disinfecting our classroom and school campus has been approved by the EPA as a N-list product, effective against killing of the CoronaVirus
- Custodial and other staff responsible for cleaning and disinfecting school surfaces and objects are trained on manufacturer's directions, Cal OSHA requirements for safe use and as required by the Healthy Schools Act, as applicable.
- Custodial staff and other staff responsible for routine cleaning and enhanced cleaning are equipped with appropriate personal protective equipment, including gloves, eye protection, and respiratory protection and other appropriate PPE as required by the product.

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

We discourage the sharing of materials by employees to the extent that is reasonably possible. Every employee and teacher are given their own supply of work related materials. In the event that equipment is shared between employees, alcohol wipes and disinfectant are provided so that proper sanitization is done between use. All employees have been trained to disinfect any commonly used equipment after each use.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- **Maintain handwashing facilities:**
 - Employees are encouraged to handwash for at least 20 seconds and on a regular basis during work hours.
 - Proper handwashing signs are posted in every restroom facility
 - Portable washing stations are located near or in classrooms that do not have access to sinks.
 - Hand sanitizing stations are located at the front of the school entrance, employee entrance and, at the elevator and the entry/ exit at the school yard.
 - All hand sanitizers used at our facility contain at least 60% ethanol and are fragrance free.

- Individual bottles of hand sanitizer are available for every employee to be used at their workspace.
- Extra bottles of hand sanitizer are accessible in common areas such as; employee screening stations, break rooms, common work rooms and front office 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 CCR Title 8, section 3380, and provide such PPE as needed.

- Personal protective equipment (PPE) is provided to every employee and is available at each workstation. The PPE includes gloves, face shields and disposable masks.
- Employees will wear their PPE when in closed spaces with other adults or students, and when performing any health screening and distance of less than 6' is unobtainable.
- Custodial staff and other staff responsible for routine cleaning and enhanced cleaning are equipped with appropriate personal protective equipment, including gloves, eye protection, and respiratory protection as required by the manufacturer's guidelines and Cal OSHA requirements for safe use.

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:

- Individuals who report symptoms of possible COVID-19 on the Daily Self Health Assessment screening will not be allowed to enter school campus.
- Employees who exhibit any signs of COVID-19 must report their illness to their immediate supervisor and the school nurse for guidance.
- If symptoms are suspected to be related to COVID-19, the school nurse will follow the LA County Department of Health Decision Pathway.
<http://publichealth.lacounty.gov/media/Coronavirus/docs/education/ScreeningEducationSettings.pdf>
- Individuals suspected or exposed to someone with COVID-19 will be asked to COVID test at a <https://covid19.lacounty.gov/testing/> or at their primary care provider's office. In the event that an employee's COVID test is not covered by their medical carrier or they are unable to access a free testing site, Echo Horizon School will cover any out of pocket expenses incurred to the employee.
- Contact tracing and Investigation of the suspected or confirmed COVID-19 case will be performed by the school nurse to determine locations in the workplace that may have been visited by the case during the high- risk exposure period, and identify those individuals who may be exposed by using Appendix C: investigation COVID-19 Cases.
- A fact sheet folder will be provided to every employee who is quarantined or isolated due to COVID-19. The information in the folder will contain the health order orders by the DPH for isolation or quarantine, COVID testing locations, DPH Decision Pathway, and a Return to Work Certificate.
- An employee who is absent due to symptoms related to COVID-19 or has a reported positive COVID test, may be eligible for Emergency Paid Sick Leave or leave under the Family Medical Leave Act ("FMLA") and may request to take Emergency Paid Sick Leave or FMLA Leave pursuant

to the School's policies. Employees may also elect to use any accrued sick leave, vacation, or personal leave.

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 any symptoms related to COVID-19 or exposure to someone with COVID 19 to their immediate supervisor and the school nurse.**
- 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:
- **All employees may obtain voluntary testing through health plans or local testing centers.**
<https://covid19.lacounty.gov/testing/>
- 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.
- **In the event of a workplace outbreak, three or more positive COVID 19 cases in a 14 day period, the school will contact the Los Angeles Department of Health for guidance of a partial or full school closure. The school will follow any Health Order issued by the DPH.**
- **The school will communicate the Health Order to the employees as well as the plan for employee COVID testing, by Brio Laboratory.**
- **The school will provide on-site COVID testing for all employees who had a workplace exposure. Employee's that were not present during the period of the outbreak will be excluded from the testing.**
- **Employees will not accrue any expense for required COVID testing and a repeated test one week later.**
- **To mitigate a COVID 19 outbreak on the school campus, we will offer weekly COVID-19 testing to all employees.**
- **We will provide additional testing when deemed necessary by Cal/OSHA**
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- **Information about COVID-19 hazard will be communicated to all employees and individuals in the event of an exposure on school campus, what is being done to control those hazards and our COVID 19 policies and procedures will be communicated.**

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.
- **All policies and procedures related to COVID-19 are accessible to all employees on the school's google drive for review. Additional training and instruction is provided at our weekly faculty meetings, or in person meetings. Additional resources are available on the school COVID-19 website.**
- **In person training has been conducted by the COVID Compliance Team for all personnel who provide on campus instruction to students, and for employees who do not work remotely.**
- **Training consists of the health and safety protocols of the Los Angeles Department of Public Health.**

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by **employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.**
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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Peggy Procter

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:

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

- *High risk exposure period:*
- 2 days before symptoms developed until 10 days after symptoms first appeared.
- 2 days before the person tested positive until 10 days after their first positive test was collected.

Appendix B: COVID-19 Inspections

Date: January 13th

Name of person conducting the inspection: [Laura Leyman](#)

Work location evaluated: Entire Facility

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Desk Barriers	Yes		
Partitions	Need two teacher partitions	School Nurse Facilities Team	
Ventilation (amount of fresh air and filtration maximized)	Yes		
Additional room air filtration	ordering 2 additional for room 221& 223	Facilities Team	Jan 14th
Administrative			
Physical distancing	Yes		
Surface cleaning and disinfection (frequently enough and adequate supplies)	Yes (see cleaning schedule)		
Hand washing facilities (adequate numbers and supplies)	Yes		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Yes		
PPE (not shared, available and being worn)	Yes		
Face coverings (cleaned sufficiently often)	Yes		
Gloves	Yes		
Face shields/goggles	Yes		

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):	

<p>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):</p>	
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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.	Names/ Date:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	NamesDate:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was the DPH notified?		Date:	

*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:

[illegible]

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**.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing

[This section will need to be added to your CPP if you have workers in employer-provided housing. Reference section [3205.3](#) for details. Employer-provided housing is any place or area of land, any portion of any housing accommodation, or property upon which a housing accommodation is located, consisting of: living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance-of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations. Employer-provided housing includes a “labor camp” as that term is used in title 8 of the California Code of Regulations or other regulations or codes. The employer-provided housing may be maintained in one or more buildings or one or more sites, including hotels and motels, and the premises upon which they are situated, or the area set aside and provided for parking of mobile homes or camping. Employer-provided housing is housing that is arranged for or provided by an employer, other person, or entity to workers, and in some cases to workers and persons in their households, in connection with the worker’s employment, whether or not rent or fees are paid or collected.]

- This section does not apply to housing provided for the purpose of emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications, and medical operations, if:
 - The employer is a government entity; or
 - The housing is provided temporarily by a private employer and is necessary to conduct the emergency response operations.
- The requirements below for Physical distancing and controls, Face coverings, Cleaning and disinfecting, Screening, and Isolation of COVID-19 cases and persons with COVID-19 exposure do not apply to occupants, such as family members, who maintained a household together prior to residing in employer-provided housing, but only when no other persons outside the household are present.]

Assignment of housing units

We will ensure that shared housing unit assignments are prioritized in the following order:

- Residents who usually maintain a household together outside of work, such as family members, will be housed in the same housing unit without other persons.
- Residents who work in the same crew or work together at the same worksite will be housed in the same housing unit without other persons.
- Employees who do not usually maintain a common household, work crew, or worksite will be housed in the same housing unit only when no other housing alternatives are possible.

Physical distancing and controls

We will ensure:

- The premises are of sufficient size and layout to permit at least six feet of physical distancing between residents in housing units, common areas, and other areas of the premises.
- Beds are spaced at least six feet apart in all directions and positioned to maximize the distance between sleepers’ heads. For beds positioned next to each other, i.e., side by side, the beds will be arranged so that the head of one bed is next to the foot of the next bed. For beds positioned across from each other, i.e., end to end, the beds will be arranged so that the foot of one bed is closest to the foot of the next bed. Bunk beds will not be used.
- Maximization of the quantity and supply of outdoor air and increase filtration efficiency to the highest level compatible with the existing ventilation system in housing units.

Face coverings

We will provide face coverings to all residents and provide information to residents on when they should

be used in accordance with state or local health officer orders or guidance.

Cleaning and disinfection

We will ensure that:

- Housing units, kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of residents.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared.

Screening

We will encourage residents to report COVID-19 symptoms to **[enter name of individual, position, or office]**.

COVID-19 testing

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing of occupants who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

Isolation of COVID-19 cases and persons with COVID-19 exposure

We will:

- Effectively isolate COVID-19 exposed residents from all other occupants. Effective isolation will include providing COVID-19 exposed residents with a private bathroom, sleeping area, and cooking and eating facility.
- Effectively isolate COVID-19 cases from all occupants who are not COVID-19 cases. Effective isolation will include housing COVID-19 cases only with other COVID-19 cases, and providing COVID-19 case occupants with a sleeping area, bathroom, and cooking and eating facility that is not shared by non-COVID-19-case occupants.
- Keep confidential any personal identifying information regarding COVID-19 cases and persons with COVID-19 symptoms, in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.
- End isolation in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any applicable local or state health officer orders.

Additional Consideration #4

COVID-19 Prevention in Employer-Provided Transportation to and from Work

[This section will need to be added to your CPP if there is employer-provided motor vehicle transportation to and from work, which is any transportation of an employee, during the course and scope of employment, provided, arranged for, or secured by an employer including ride-share vans or shuttle vehicles, car-pools, and private charter buses, regardless of the travel distance or duration involved. Reference section [3205.4](#) for details.]

This section does not apply:

- If the driver and all passengers are from the same household outside of work, such as family members.
- To employer-provided transportation when necessary for emergency response, including firefighting, rescue, and evacuation, and support activities directly aiding response such as utilities, communications and medical operations.]

Assignment of transportation

We will prioritize shared transportation assignments in the following order:

- Employees residing in the same housing unit will be transported in the same vehicle.
- Employees working in the same crew or worksite will be transported in the same vehicle.
- Employees who do not share the same household, work crew or worksite will be transported in the same vehicle only when no other transportation alternatives are possible.

Physical distancing and face coverings

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing and Face Coverings** are followed for employees waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

Screening

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

Cleaning and disinfecting

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

Ventilation

We will ensure that vehicle windows are kept open, and the ventilation system 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 the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

Hand hygiene

We will 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.