

COVID-19 Prevention Program (CPP)

Plumas Charter School

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

Date: 8/11/2021

Authority and Responsibility

Danielle Wagner Plocki, BSN, RN, School Nurse 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.

The Site Directors and/or School Nurse will be responsible for filling out information in Appendix A and Appendix B.

Employee Participation

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

Employees are fully educated on the policies and procedures in the Plumas Charter School COVID-19 Health and Safety Plan. Employees must sign an acknowledgement form stating that they have received

training on our comprehensive COVID-19 Prevention Program Plan to prevent COVID-19 transmission in our schools, and that they are to uphold these policies and procedures and effectively execute them in their work. Employees are asked and encouraged to participate in the identification of any issues surrounding effective implementation of these policies. There is a clear communication pathway to follow should any questions or concerns regarding proper implementation of the policies arise. Employees, along with the designated Site Director at each of our school sites, are responsible for identifying any potential COVID-19 hazards at his/her site. The Site Directors and School Nurse are responsible for evaluating any COVID-19 hazards that may arise, and correcting them.

Employee Screening and Vaccination Status

We screen our employees by:

Daily Health Screening

All employees will be screened daily upon arriving on campus. Screenings will be conducted by trained site leads, school nurse, designated staff, or the employee can do a self-screening. Screening will take place outside prior to entering the building. Face coverings will be worn by the screener and employee during the screening.

Screening Procedure:

1. Check the individual's temperature using a touchless device. Follow the manufacturer's directions. A temperature exceeding 100°F is considered a failed screening and the employee will be excluded from campus.

2. If the temperature check is less than 100°F, ask the following questions:

- a. Have you been exposed to someone with COVID-19?
- b. In the last 48 hours, have you experienced any of the following NEW or CHANGING symptoms?
 - i. Fever or fever symptoms
 - ii. Cough
 - iii. Trouble breathing or shortness of breath
 - iv. Chills or repeated shaking
 - v. Muscle aches or headaches
 - vi. Sore throat, or nasal congestion
 - vii. Loss of smell or taste, or a change in taste
 - viii. Nausea, vomiting, diarrhea or abdominal pain

c. A "yes" response to questions 2(a) or 2(b) (i-viii) will result in exclusion of the employee from campus. Refer to "Return to School After Illness" and "Covid-19 Exposure Screening Flowchart".

In addition to the morning daily screening, employees may be screened throughout the school day for signs of illness.

Documentation of daily screenings by employees will be entered into a Google Doc Form and includes the following information: employee name, the date, the site the employee works at, the employee's temperature reading, a Yes/No if the individual is experiencing any of the listed symptoms, a Yes/No if the individual has

been exposed to someone with COVID-19. Only staff who need to have access to the health screening data will have access.

Vaccination Status

PCS may inquire about vaccination status and instruct employees not to disclose any additional medical or other family medical information and must maintain this information as confidential. Covered employers must also provide notice pursuant to the California Consumer Privacy Act (CCPA). See acceptable documentation of vaccination status below.

Employees have the right to decline to state if they are vaccinated or not. Should an employee decline or refuse to disclose their vaccination status, the employer must treat the employee as unvaccinated and must not take disciplinary or discriminatory action against an employee.

“Fully Vaccinated” is defined as an employee (who at least 14 days prior) received the full-dose of the vaccine (either two-dose or single dose). This now includes that for employees vaccinated outside of the United States, the vaccine must be listed for emergency use by the World Health Organization (WHO).

As of 8/12/21 the State of CA has issued a new health order which requires verification of vaccination status among eligible K-12 school workers and requires unvaccinated workers to undergo weekly testing. This order supersedes the revised Cal/OSHA standards.

All schools must verify the vaccination status of all workers. The following modes may be used as proof of vaccination:

A. Pursuant to the CDPH Guidance for Vaccine Records Guidelines & Standards, only the following modes may be used as proof of vaccination:

1. COVID-19 Vaccination Record Card (issued by the Department of Health and Human Services Centers for Disease Control & Prevention or WHO Yellow Card) which includes name of person vaccinated, type of vaccine provided and date last dose administered); OR
2. a photo of a Vaccination Record Card as a separate document; OR
3. a photo of the client's Vaccination Record Card stored on a phone or electronic device; OR
4. documentation of COVID-19 vaccination from a health care provider; OR
5. digital record that includes a QR code that when scanned by a SMART Health Card reader displays to the reader client name, date of birth, vaccine dates and vaccine type; OR
6. documentation of vaccination from other contracted employers who follow these vaccination records guidelines and standards.

In the absence of knowledge to the contrary, a school may accept the documentation presented as valid.

B. Schools must have a plan in place for tracking verified worker vaccination status. Records of vaccination verification must be made available, upon request, to the local health jurisdiction for purposes of case investigation.

C. Workers who are not fully vaccinated, or for whom vaccine status is unknown or documentation is not provided, must be considered unvaccinated.

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:

In the event a COVID-19 related hazard is identified, the Site Directors and School Nurse will be immediately notified. Correction of the hazard will become a priority for the Site Directors and/or School Nurse. Corrective measures will take place immediately or as soon as reasonably possible. If outside contractors need to be involved, in the event of engineering or deep cleaning corrective measures, they will be notified immediately. The Site Directors and/or School Nurse will oversee follow-through of the corrective measure, and that it is completed in a timely manner.

Controls of COVID-19 Hazards

Physical Distancing

There are no physical distancing or barrier requirements regardless of employee vaccination status, with the following exceptions:

- The Site Director and/or School Nurse will assess whether it is necessary to implement physical distancing and barriers to mitigate transmission of the virus. If deemed necessary for safety, such protective measures may be used.
- During an outbreak (3 or more employees in an exposed group), the Site Director and/or School Nurse will evaluate whether physical distancing or barriers are necessary.
- In a major outbreak (20 or more employees in an exposed group), physical distancing and barriers will be used for all employees, regardless of vaccination status.

Arrival and Departure

Efforts will be made to minimize contact among students, staff, families and the community at the beginning and end of the school day.

Arrival and drop-off times will be staggered.

Routes for entry and exit into buildings will be defined to minimize direct contact with others. Non-essential visitors, including parents/guardians, will be allowed to enter school buildings on a limited basis. All visitors will be screened for COVID-19 symptoms, possible exposure, and have their temperature checked prior to entering a school building.

Classroom Space

Students and their teacher will remain in the same space throughout the day with a small group/cohort whenever possible. Movement of teachers, students, and staff will be minimized as much as practicable. Meals will be served in classrooms, or outside, with the same cohort of students and their teacher. Sharing of food items is prohibited.

Non-Classroom Spaces

Movement among non-classroom spaces such as offices, hallways and communal areas will be minimized. Recess activities will be outside. Classes will use outdoor spaces for learning when appropriate and practicable.

All school spaces will be cleaned and disinfected daily.

Face Coverings

PCS provides clean, undamaged face coverings and ensures they are properly worn by employees over the nose and mouth when indoors, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

Employees are required to wear a face covering while on campus regardless of vaccination status. Plumas Charter School has cloth, disposable 3-ply face coverings, and NIOSH-approved N95 face masks for all employees to use in the workplace. These face coverings will be distributed to all employees, and the Site Directors/Coordinator should be notified if a replacement is needed. Employees may use their own face covering if preferred so long as the use and care guidelines below are followed. Cloth face coverings must be washed daily.

Employees working alone do not need to wear face coverings, but any time an employee is in a common area or within six feet of another person, the employee must be wearing a face covering, regardless of vaccination status.

Employees may remove their face covering if outdoors, regardless of vaccination status. It is recommended that unvaccinated individuals wear a face covering outdoors if physical distancing of six feet cannot be maintained.

Face coverings will not be required for anyone who is exempt from wearing one including: persons under age 2, persons who have a medical or mental health condition or disability that would impede them from properly wearing or handling a face covering, those with a communication disability, or when it would inhibit communication with a person who is hearing impaired, persons who are having trouble breathing, or persons who are unable to remove the face covering without assistance. Those with communication disabilities or caregivers of those with communication disabilities can consider wearing a clear mask or cloth mask with a clear panel when appropriate. PCS requires a note from a health care provider for a face covering exemption.

Persons exempted from wearing a face covering due to a medical condition, as confirmed by a healthcare provider, must wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it. In this case, face shields and drapes will be provided by the school.

Should an employee encounter a non-employee on-campus that is not wearing a face covering, the employee will graciously inform the individual of our Face Covering Policy and provide them with a disposable face covering.

Failure to follow the PCS's face covering policy may result in disciplinary action.

Face Covering Appropriate Use Guidelines

Face coverings are only effective for protection if they are handled, worn, stored and disposed of properly. Employees are also required to adhere to the following guidelines when wearing a face covering:

Practice proper hand hygiene. Before and after handling the face covering (to put on, adjust, or take off),

either wash your hands or use hand sanitizer to reduce cross-contamination risk. The outside of the face covering is considered dirty.

To ensure that you are wearing the face covering properly, make sure the face covering is fitted and is covering your nose, mouth and chin.

If necessary, mark the outside of the face covering in some way so you can easily identify which side is the outside of the face covering, and handle it accordingly. Consider marking the outside with your initials in permanent ink. Remove the cloth face covering while eating during your meal period.

Do not touch the outside of your face covering while it is on your face.

Don't pull your face covering below your chin while you are wearing it. Leaving the face covering dangling or improperly fitted to your face creates opportunities for cross-contamination.

After removing a cloth covering, inspect it to see if it is torn, wet, or soiled. If it is, throw it away and obtain a new face covering from the Site Director/Coordinator.

If not, please properly store the face covering as follows:

Fold the face covering in half so that the outside surfaces are touching. Place the face covering into a clean bag or container. Store a face covering in a clean place such as a clean paper or plastic bag. Never store it in a purse or pocket.

Acceptable Face Coverings:

Disposable face mask

Cloth face mask

N95 face mask

Face Shield- Face shields can be used for staff in the classroom ONLY in situations where communicating with young children and assisting students with special needs deem it appropriate. The wearer will maintain physical distancing to the extent practicable. Staff will return to wearing a face covering outside of the classroom.

Unacceptable Face Coverings:

Neck Gaiter, Scarf, Bandana, Ski Mask, Balaclava, Turtleneck, Collar, or single layer of fabric

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.

Respirators

PCS will supply respirators (NIOSH-approved N95s) to all employees upon request, or at any time an employee communicates their desire to wear one. PCS will provide the employee the correct size and type to fulfill their request.

In a “major outbreak” (defined as 20 cases within 30 days), PCS will offer a respirator for voluntary use to all employees in the exposed group, regardless of vaccination status.

Employees will be trained on the proper use and care of respirators. Training includes:

- The PCS policy for providing respirators
- The right of employees who are not fully vaccinated to request respirators
- How to properly wear the respirator provided
- How to perform a seal check each time the respirator is worn, including being mindful of the fact that facial hair interferes with a seal
- Awareness that the need to replace a respirator varies with use and environment. Provided respirators are meant to be disposed of and cannot be cleaned or disinfected. They must be replaced if they get damaged, deformed, dirty, or difficult to breathe through. A best practice is to replace filtering facepiece respirators at the beginning of each shift. The CDC recommends replacing a disposable filtering facepiece respirator (N95), after it has been taken on and off five times. Filtering facepiece respirators may not fit correctly after repeated use.
- Acknowledgement of Receipt of Title 8ccr § 5144 Appendix D

Engineering controls

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

Employees will open classroom and office windows and doors to introduce outdoor air throughout the work day whenever possible.

In the event that outside air needs to be minimized due to hazards such as heat, cold or wildfire smoke, the building air conditioning or heating system will be used. If an air conditioning system is in use, the setting that brings in fresh air will be used.

All filters and filtration systems will be routinely checked, and replaced if needed, to ensure optimal indoor air quality.

Classrooms will be equipped with air purifying systems that include High Efficiency Particulate Air (HEPA) filters.

Cleaning and disinfecting

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

All classrooms and offices will be thoroughly cleaned and disinfected daily by an independent cleaning service. This cleaning service uses all their own cleaning supplies and Environmental Protection Agency (EPA) approved cleaners and disinfectants against COVID-19.

Employees will clean and disinfect classrooms and offices at least daily, and as practicable, throughout the day using Environmental Protection Agency (EPA) approved disinfectants against COVID-19 provided by the school.

Frequently touched surfaces will be cleaned and disinfected, including but not limited to: door handles, light switches, handrails, sink handles, bathroom surfaces, tables, student desks, chairs, telephones.

All cleaning supplies will be kept out of student's reach and stored in a space with restricted access.

Disinfectants will not be used when children are near, and adequate ventilation will be available when using these products.

Computers and electronics will be cleaned between users with appropriate cleaning and disinfectant containing at least 60% ethyl alcohol.

Outdoor playground equipment with high touch surfaces will be cleaned daily by employees. All employees and workers who clean and disinfect the school site will wear proper protective equipment (PPE) including gloves and respiratory protection.

Classrooms and offices will be properly ventilated during cleaning and disinfecting.

Procedure:

Follow the manufacturer's instructions for proper use of all cleaners and disinfectants.

Don appropriate protective equipment (PPE) as required by the products Safety Data Sheet.

Clean any dirty surfaces using soap and water first, before using disinfectant. Cleaning with soap and water reduces the number of germs, dirt, and impurities on the surface. Disinfecting kills any remaining germs on surfaces, which further reduces any risk of spreading infection.

Keep the surface wet with disinfectant for a period of time (see product label).

Always wash hands after removing gloves.

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

In the event that a COVID-19 positive individual was in a facility during the high-risk exposure period, that site will be closed to all employees and students. Students and staff may resume using that particular school building after: 14 days have passed AND thorough cleaning and disinfection of the building has occurred AND the public health investigation is underway AND the Plumas County Public Health Agency indicates it is safe to return to the classroom.

An outside cleaning service will be made aware of the situation and thoroughly clean and disinfect the building including all materials and equipment therein.

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 daily.

Donning appropriate PPE before use of the EPA approved disinfectant.

Keep the surface wet with disinfectant for a period of time (see product label).

Rigorously rubbing the surface with a disposable paper towel.

Always wash hands after removing gloves.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

Soap and water and hand sanitizer will be available throughout the day for employees and students.

In addition to indoor hand washing facilities, portable hand washing stations are located outside at each building entrance.

Employees will wash their hands before and after eating; after coughing or sneezing; after being outside; before and after using the restroom; and before putting on a face covering and after removing a face covering . Employees will wash their hands for 20 seconds with soap, rubbing thoroughly after application, and use paper towels to dry their hands thoroughly.

Employees will use fragrance-free hand sanitizer after contact with frequently touched surfaces and when hand washing is not practicable. Sanitizer must be rubbed into hands until completely dry. Hand sanitizers with at least 60% ethyl alcohol are necessary. If hand sanitizer is consumed by a student, call Poison Control: 1-800-222-1222.

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:

Immediately notified in-person and in-writing. A copy of "AB685 Mandatory COVID-19 Potential Exposure

Notice," will be given. Written documentation of notification provided to "all employees at the worksite during the high-risk exposure period" (as opposed to all employees who "may" have been exposed) is required; and may include personal service, email or text message if it can reasonably be anticipated to be received by the employee within one business day. If the employer should reasonably know that an employee has not received the notice, or has limited literacy in the language used in the notice, the employer shall provide verbal notice, as soon as practicable, in a language understandable by the employee.

The School Nurse is responsible for all internal "close contact" identification. The School Nurse has been trained by our local Public Health Agency to assist them in this role. The School Nurse works closely with Public Health to help identify, manage and track employees and students who are under case investigation due to COVID-19 infection or exposure.

The School Nurse will: determine when the COVID-19 positive individual was last in the workplace and the date of testing or onset of symptoms, determine which employees may have been exposed, notify employees of any potential exposure within one business day, notify employees of testing procedure, and investigate whether workplace conditions could have contributed to the risk of exposure and if so, address corrections.

"Regular Outbreaks" defined as 3 cases within 14 days- requires that employees in the exposed group must wear face coverings and must be notified of their right to request a respirator. Employers must evaluate the use of physical distancing or barriers and use MERV-13 or higher filters if compatible. Testing is not required to employees who were fully vaccinated before the outbreak, or were COVID-19 cases in prior 90 days.

"Major Outbreaks" defined as 20 cases within 30 days- all the requirements of a "regular" outbreak apply, with the addition of the following:

- Testing must be provided regardless of vaccination status
- Must provide a respirator for voluntary use and determine need for a respiratory protection program
- Must implement physical distancing
- Must install barriers at workstations where physical distancing is not maintained at all times
- Must wear face coverings indoors AND outdoors when six-foot physical distancing cannot be maintained, regardless of vaccination status.
- "Major" outbreak ends when there are fewer than 3 cases in the exposed group in a 14-day period (as opposed to no new cases).

All employees are offered required COVID-19 testing at no cost during work hours.

Procedure for COVID-19 testing:

1. Call Plumas District Hospital Clinic at 530-283-5640.
2. State that you are an employee of Plumas Charter School and that you would like to receive a COVID-19 test. (Plumas Charter School has an agreement with Plumas District Hospital that our employees may be tested at any time).
3. The clinic will schedule you for an appointment for testing at the earliest time available.
4. Results are posted on the patient portal system within 24-48 hours.
5. If the employee is being tested as a result of possible exposure, he/she is to quarantine until after the test is resulted and after conditions on our "COVID-19 STAFF Exposure Flow Chart" are met.

If the employee is being tested due to symptoms, he/she is to quarantine until after the test is resulted AND return to work based on our "Return to School After Illness Policy."

If the employee is being tested due to a recommended routine testing schedule, he/she may return to the workplace before the results are posted.

Testing

PCS will offer testing at no cost to employees during paid time to:

- Symptomatic unvaccinated employees, regardless of whether there is a known exposure.
 - Unvaccinated employees after an exposure.
 - Vaccinated employees after an exposure if they develop symptoms.
 - Unvaccinated employees in an outbreak.
 - All employees in a major outbreak.
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- Testing Following COVID-19 Cases in the Workplace- PCS will make testing available to all employees who have been determined to be a “close contact” with the exception of 1) fully vaccinated employees who do not have COVID-19 symptoms, 2) employees who were previously a COVID-19 case, met the return-to-work criteria and have remained symptom free for 90 days after initial onset of symptoms or after first positive test if never developed symptoms (“natural immunity”).
 - Asymptomatic unvaccinated or incompletely vaccinated workers are required to undergo diagnostic screening testing. Workers may be tested with either antigen or molecular tests to satisfy this requirement, but unvaccinated or incompletely vaccinated workers must be tested **at least once weekly** with either PCR testing or antigen testing. Any PCR (molecular) or antigen test used must either have Emergency Use Authorization by the U.S. Food and Drug Administration or be operating per the Laboratory Developed Test requirements by the U.S. Centers for Medicare and Medicaid Services. The School Nurse will conduct this testing in-house.
 - Unvaccinated or incompletely vaccinated workers must also observe all other infection control requirements, and are not exempted from the testing requirement even if they have a medical contraindication to vaccination, since they are still potentially able to spread the illness. Previous history of COVID-19 from which the individual recovered more than 90 days earlier, or a previous positive antibody test for COVID-19, **do not** waive this requirement for testing.
 - Schools with workers required to undergo workplace diagnostic screening testing should have a plan in place for tracking test results and conducting workplace contact tracing, and must report results to local public health departments. There are IT platforms available that can facilitate these processes for schools

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how:

Employees should report COVID-19 symptoms to their Site Director. The Site Director will inform the School Nurse who will provide guidance on appropriate next steps in compliance with our Board-approved COVID-19 Health & Safety Plan. Employees should report any possible hazards to the Site Directors and/or the School Nurse.

- 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:

Voluntary testing can be done using the same procedure as described in the previous section "Investigating and Responding to COVID-19 Cases." Plumas Charter School has accounts with local healthcare facilities conducting COVID testing and communicates with staff regarding testing requirements and accessibility.

- 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.

Required testing will be done using the same procedure as described in the previous section "Investigating and Responding to COVID-19 Cases." Required testing is available at no cost to the employee and may be done during working hours. In the event that a teacher needs testing during instructional time, an instructional aid, other teacher, or Site Director will cover their class for them.

- 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.

Documentation and tracking of possible exposure, and confirmed positive cases will be conducted by the School Nurse in partnership with Plumas County Public Health Agency (PCPHA). In the event there is a positive COVID-19 case at one of our school sites, the School Nurse will be responsible for all communication between PCPHA and the school. The School Nurse will disseminate PCPHA information to Site Directors and Administration. The Executive Director will be responsible for any media inquiries. The School Nurse will be responsible for notifying families and employees. FERPA confidentiality guidelines will be adhered to.

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.
- 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.

- Awareness that per CDPH face coverings are recommended for unvaccinated persons outdoors where six feet of physical distancing cannot be maintained.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace unless: fully vaccinated before the close contact and have no symptoms; or were previously COVID-19 cases who returned to work and have remained symptom free for 90 days after initial onset of symptoms or after first positive test if never developed symptoms (“natural immunity”).
- 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

Exclusion Pay

If an employee has been exposed to COVID-19 while at work, that employee will be excluded from being physically present at the workplace until it is safe for the employee to return to work. Employees with COVID-19 are excluded from the workplace until it is safe to return to work. Remote work will be provided.

An employee is exposed to COVID-19 at work when that person is within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high risk exposure period.” This exposure is irrespective of the use of face coverings. “High risk exposure period” means the following time periods: 1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or 2) for persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.

An employee need not be excluded from work if the employee with close contact: 1) was fully vaccinated before the close contact and does not develop COVID-19 symptoms; or 2) had COVID-19 and returned to work in accordance with the return to work protocol and has remained free of COVID-19 symptoms for 90 days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.

If an employee is excluded from work due to COVID-19 exposure or has a COVID-19 case, the employee is entitled to continue and maintain the employee's earnings, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job. Before accessing exclusion pay, affected employees must use and exhaust any accumulated or allotted paid sick leave available for COVID-19 leave.

Exclusion pay is not available where the employee received disability payments or was covered by workers' compensation and received temporary disability, nor where the employer demonstrates that the close contact is not work related. Exclusion pay is also not available to employees where the employer demonstrates that the COVID-19 exposure is not work related.

- 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.

Documentation and tracking of possible exposure, and confirmed positive cases will be conducted by the School Nurse in partnership with PCPHA. In the event there is a positive COVID-19 case at one of our school sites, the School Nurse will be responsible for all communication between PCPHA and the school. The School Nurse will disseminate PCPHA information to school leadership. The Executive Director will be responsible for any media inquiries. The School Nurse will be responsible for notifying families. FERPA confidentiality guidelines will be adhered to.

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. See the “Staff Exposure Flow Chart” for close contact return-to-work criteria.

Taletha Washburn

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:

Date:

Name(s) of Employees 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

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/Partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Signage and physical guides			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
Limit sharing of supplies and equipment			
No-contact thermometers calibrated and functioning			

properly			
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Exposure Controls	Status	Person Assigned to Correct	Date Corrected
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			

Face shields/goggles			
Respiratory protection			

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

Date:

Name of Person Conducting the Investigation:

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

Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high risk exposure period, and who may have been exposed (attach additional information):	
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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.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
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 local health department notified?		Date:	

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

Appendix D: COVID-19 Training Roster

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

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 (who are not vaccinated and asymptomatic), 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.
- 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.

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.

Major COVID-19 Outbreaks

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**.