

COVID-19 Prevention Program (CPP)

Cottonwood Union School District

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

Date: 01/14/2021

Authority and Responsibility

Cottonwood Union School District 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.

Employee Participation

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

* Utilizing email, staff meetings and work order protocols to request PPE, communicating repairs, identifying solutions to exposure areas, and requesting purchases or accommodations to remove hazards.

The custodian and principal/superintendent used Appendix B to evaluate the facility for COVID exposures.

Employee Screening

We screen our employees by:

- * Daily visual checks
- * Taking temperatures, as needed
- * Sending staff for surveillance testing

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:

See Appendix B.

The principal and the custodian will complete Appendix B and work together to correct any exposures immediately. Staff will be asked to report any exposures immediately so the principal and custodian can correct the exposure.

The severity of the hazard will be assessed and correction time frames assigned, accordingly.

Individuals are identified as being responsible for timely correction.

Follow-up measures are taken to ensure timely correction.

Controls of COVID-19 Hazards

Physical Distancing

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

- Providing reminders of distancing expectations, limiting use of staff break rooms, limiting capacity in work rooms, adhering to local Public Health guidelines, and providing recommendations when 6' of distancing is not practicable.
- Teachers and support staff have put protocols in place for encouraging social distancing (Examples include spots on the floor, spots on cafeteria seats, tape on the floor for desk boundaries, airplane arms, to wearing masks on the bus, etc.).
- Board meetings, Special Education meetings and other meetings are offered remotely (Zoom)
- Staff are expected to eat lunch 6' apart
- Staff meetings are either held remotely (Zoom) or with 6' distance between staff members
- Eliminating the need for workers to be in the workplace when they are a close contact or have COVID – e.g., telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including visitors.

- Visual cues such as signs and floor markings to indicate where employees and others are located or their direction and path of travel.
- Staggered break times.
- Adjusted work processes or procedures to allow greater distance between employees.
- Cohort students on the playground, cafeteria, etc.

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.

- The office will provide a face covering to students who inadvertently fail to bring one to campus to prevent unnecessary exclusions.
- To participate in-person, all students in grades 3-8 must wear a mask at all times.
- Any face covering brought by a student must be school appropriate.
- All students must wear face coverings during arrival/departure, but only 3rd - 8th grade must mask all day
- In order to comply with this guidance, schools must exclude students from campus if they are not exempt from wearing a face covering under CDPH guidelines and refuse to wear one provided by the school.
- Staff must wear face coverings (cloth mask or shield w/ drape) in accordance with CDPH guidelines unless Cal/OSHA standards require respiratory protection.
- Staff and students will be encouraged to wash cloth face coverings weekly and more frequently, if necessary.
- For staff, in limited situations where a face covering cannot be used for pedagogical or developmental reasons, (i.e. communicating or assisting young children or those with special needs) a face shield with a drape can be used instead of a face

covering while in the classroom as long as the wearer maintains physical distance from others, to the extent practicable. Staff must return to wearing a face covering outside of the classroom.

- The district will purchase additional face coverings that may better address the needs of staff (i.e. see-through mask's, etc.)
- Parents and non-staff adults must wear face coverings (i.e., parent drops off/picks up a kindergartener at the classroom door).
- Staff will wear face coverings when outside of their personal workspaces, when interacting with others within their workspace, and in any situation where social distancing is minimized. During recess duties, staff are not required to wear a face covering

when outside and distanced from students.

- Exemptions from wearing face coverings may be made for the following reasons:

Breathing Difficulties (documented by a doctor's note – a face shield must be worn)

Special Needs Students (documented and included in the student's IEP or 504 Plan)

- Our staff also provides training for proper face-mask practices.
- A verbal reminder will take place when staff or students are not wearing their face covering correctly.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

- Employees and students are expected to wear a mask when they cannot maintain at least six feet between individuals.
- Solid partitions are used in high traffic areas (i.e. the office, cafeteria, small group instruction tables) and on student desks.
- Student cohorts and seating charts are used to reduce exposure and identify close contacts.

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

- Changing air filters routinely
- Installing air filtration systems in every classroom
- Encouraging staff to regularly open windows and doors when the weather permits
- Hold physical education/music class outside, whenever possible
- Maintaining and adjusting the ventilation system

Cleaning and disinfecting

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

- Aerosol spray/fogging machines with probiotics
- Daily disinfection
- Washing and cleaning with approved COVID killing products
- Reminding students to wash their hands regularly
- Using hand-sanitizer regularly
- Ensuring adequate staff, supplies, and adequate time for cleaning to be done properly
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection

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

We will follow the Shasta County Health Department guidelines.

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:

- Employees will be expected to clean/sanitize materials between use
- Materials and training will be provided to employees to do clean/sanitize themselves

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

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluating and installing hand-sanitizer stations throughout the schools
- Distributing hand-sanitizer and soap in every classroom
- Encouraging hand washing before students eat and after recess
- Modeling proper hand washing protocols with students
- Encouraging and allowing time for employee and student handwashing
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol)
- Encouraging employees and students to wash their hands for at least 20 seconds each time.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. [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:

Offered COVID-19 testing at no cost during his/her working hours.

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 our COVID 19 Liaison, principals, and school health officials
 - * Our COVID 19 Liaison will work with the Principal to complete the contact tracing, send notifications to staff, students, and parents if they are close contacts

- 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:

- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.

- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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
 - 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.

Superintendent

01/14/2021

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

Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

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

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

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)	Good	Principal/Staff	
Gloves	Good	Principal/Staff	
Face shields/goggles	Good	Principal/Staff	
Respiratory protection	Good	Principal/Staff	

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):	

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

Date:

Name of Person Conducting the Training:

Employee Name	Signature