

COVID Prevention Program (CPP)
Injury Illness Prevention Program Addendum
(Revised to reflect changes from the [June 21, 2021 Update](#))

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

Identification and Evaluation of COVID-19 Hazards We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the evaluation of COVID-19 hazards by: participating in the walk-through with the Loss Control Analyst.

Employee screening

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

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix B: COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

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

Control of COVID-19 Hazards

Physical Distancing

After July 31, physical distancing and barriers are no longer required (except during outbreaks), but employers must provide all unvaccinated employees with N95s for voluntary use.

Employers can eliminate physical distancing and partitions/barriers for employees working indoors and at outdoor mega events if they provide respirators, such as N95s, to unvaccinated employees for voluntary use.

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors and when outdoors, and where required by orders from the [California Department of Public Health \(CDPH\)](#) or local health department. Employees may use their own face coverings. Face coverings are provided to all employees should they forget their own. The board has adopted [Administrative Regulation 5132.1 Student Mask and Face Covering](#) that addresses non-compliance.

Masks are required for all employees indoors at school sites when “sharing indoor spaces with students,” regardless of vaccination status. [8/2/21 CDPH](#)

Masks are required indoors for staff who are unvaccinated (or have not documented vaccination status) regardless of students being present. In limited situations where a face covering cannot be used for pedagogical or developmental reasons, a face shield with a drape can be used instead of a face covering.

The following are exceptions to the use of face coverings in our workplace for staff who are unvaccinated (or have not documented vaccination status):

- When alone in a room with a closed door or a vehicle
- When eating and drinking, provided employees are 6 feet apart
- When an accommodation is required
- When job duties make a face covering infeasible or create a hazard
- [No employer shall prevent any employee from wearing a face covering when not required by this section, unless it would create a safety hazard, such as interfering with the safe operation of equipment.](#)

[Signs will be posted at the entrance of each school district facility, indicating the face covering requirements for non-employees.](#)

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between staff members: Sneeze guards have been installed across campuses for employees that have requested them.

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

- Providing stand-alone portable HEPA filters to each instructional and office spaces.
- Maintaining and adjusting the ventilation system as needed to provide the optimal air exchanges with the existing ventilation system.
- Installing MERV 12 filters in all areas that can accommodate them, based on the analysis conducted by the HVAC specialist.

Cleaning and disinfecting

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

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

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

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by providing staff with disinfectant wipes to be used to disinfect between uses. All staff have been trained and we will offer on-going training as well.

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

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

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

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144.

Investigating and Responding to COVID-19 Cases

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

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

Investigating and responding to student COVID-19 cases will be done by Tiffany Hazelwood. Investigating and responding to staff COVID-19 cases will be done by Tina Peterson. Data points collected during the

investigation are included in **Appendix C: Investigating COVID-19 Cases**. Anyone found to be in close contact (within six feet for 15 minutes or more within a 24-hour period), will be contacted via phone call. Anyone that was not a close contact but on the same site, will receive a courtesy notification via mail or email.

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

- Offered COVID-19 testing at no cost during their working hours. The information on [testing facilities](#) will be provided by Human Resources.
- Provided information on benefits described in the following sections entitled “Training and Instruction”, and “Exclusion of COVID-19 Cases”.

If students have been exposed to someone with COVID-19 while on-campus (i.e., a close contact) the District will encourage them to get tested through their personal medical provider or through a District provided testing center with UCSD. The District will follow the [COVID-19 K-12 Decision Tree](#).

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. Symptoms should be reported to your supervisor and Tina Peterson, Human Resources Director. Possible hazards should be reported to the School Safety Coordinator.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- 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 that 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.
 - An infectious person may have no symptoms.
- The importance of wearing face coverings.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.

- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on how the vaccine is effective at preventing COVID-19 and protecting against both transmission and serious illness or death.

Training is documented via our online JPA learning library.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace following the guidance in the [COVID-19 K-12 Decision Tree](#).
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that an employee was exposed to COVID-19 in the workplace and is able and available to work. This will be accomplished through use of available leaves and other rights afforded to employee under applicable law, Board Policy/Administrative Regulation, and/or collective bargaining agreement.
- Providing employees at the time of exclusion with information on available benefits.
- Fully vaccinated workers who do not have COVID-19 symptoms no longer need to be excluded from the workplace after a close contact.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Human Resources keeps a record of and tracks all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed. A [COVID-19 Dashboard](#) is posted on our website and provides up to date information on positive cases on our campuses.

Return-to-Work Criteria

- The District will follow the [COVID-19 K-12 Decision Tree](#).



Tina Douglas

08/11/2021

Date

Assistant Superintendent, Business Services

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: Gordon Plotzke, Loss Control Analyst

Date: _____

Name(s) of employee and authorized employee representative that participated:

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID19 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 COVID19 prevention controls, including barriers, partitions and ventilation

Appendix B: COVID-19 Inspections

Date: _____

Name of person conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions (sneeze guards)			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection			
Hand washing facilities			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently, often)			
Gloves			
Face shields/goggles			

Appendix C: Investigating COVID-19 Cases

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

1. Employee (or non-employee*) name
2. Occupation (if non-employee, why they were in the workplace)
3. Location where employee worked (or non-employee was present in the workplace)
4. Date investigation was initiated
5. Was COVID-19 test offered?
6. Name(s) of staff involved in the investigation
7. Date and time the COVID-19 case was last present in the workplace
8. Date of the positive or negative test and/or diagnosis
9. Date the case first had one or more COVID-19 symptoms
10. Information received regarding COVID-19 test results and onset of symptoms (attach documentation)
11. Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information)
12. Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to all employees who may have had COVID-19 exposure and their authorized representatives.
13. Date notice was given
14. Names of employees that were notified
15. Independent contractors and other employers present at the workplace during the high-risk exposure period.
16. Date they were present at the workplace
17. Names of individuals that were notified
18. What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
19. What could be done to reduce exposure to COVID-19, if anything?
20. Was local health department notified?
21. Date the local health department was notified