

# COVID-19 Prevention Program (CPP)

## Yreka Union School District

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

**Date:** January 15, 2021

### Authority and Responsibility

The Yreka Union School District, led by the administrative team of Chris Harris/Superintendent, Donna Tudor/Human Resource Manager, Jim Berry/Chief Business Officer, Denise Culp/Administrative Assistant, Veronica Hanna/Principal, Amy Dunlap/Principal, Lorraine Joling/Assistant Principal, Melissa Casson/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.

Collaborate with CSEA and CTA bargaining units to mitigate potential hazards.

### Employee Participation

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

reporting potential hazards to their direct supervisor, site administrator or the Human Resources Manager, Donna Tudor at dtudor@yrekausd.net. Hazards must be brought to the attention of the Yreka Union School District in a timely manner.

## **Employee Screening**

We screen our employees by:

Employees self-screen by using a daily self-screening tool provided to each employee. Our employees use the Passive Screening process recommended by the department of public health. Employees shall undergo a symptom check before entering a work area by checking their symptoms at home each day before leaving for work. Employees are encouraged to respectfully remind others to follow all policies, procedures and practices adopted related to COVID-19. If/when active screening becomes necessary, we will abide by the CDPH guidelines and recommendations.

## **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:

The severity of the hazard(s) and/or unhealthy work conditions, practices or procedures will be assessed through a collaborative investigation and will be based on compliance with scientific practices known to reduce or prevent the transmission of COVID-19, as determined by state and local health guidance, regulations and/or orders. Part of the investigation will involve interviews with individuals who may be familiar with the condition, practice or procedure being inspected. Walk-thru visits may be conducted, as appropriate and are necessary. Meetings with individuals who may have valuable contributions toward the assessment of the conditions, practices or procedures may be conducted. If unsafe or unhealthy work conditions are brought to our attention, our Facilities/Maintenance Department will conduct the inspection to ensure we are in full compliance and that will be documented in Appendix B.

## **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:

using our "buzz in" system at each school site to insure only essential persons are on campus,  
using signage and visual reminders to keep socially distant,  
implementing virtual meeting platforms to decrease face-to-face meetings,  
enforce that all individuals, while in the same room, where face coverings,  
use plexiglass partitions and dividers when six feet is not possible.

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.

Face coverings will be worn by all individuals that are on campus and in the same area/room as other people. If a person does not have a face mask, we will provide that person with a clean mask. Students and staff have been issued no less than two cloth face masks. Staff collect the cloth masks on a regular basis and launder these masks on a regular basis as well, in order to return them to the proper owner. Frequent reminders will be communicated as to the proper method to wearing a face covering. Any employee that witnesses an individual not wearing a face covering properly is expected to bring that to that individual's attention in order to have all individuals comply with the proper technique of wearing a face covering.

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:

The district has purchased plexiglass partitions for all rooms where six feet is not able to be maintained. Face coverings shall be worn by all individuals that are in a common area, classroom or general area where six feet cannot be maintained. We limit the number of people in a classroom, common area and/or playground to increase the amount of distance between individuals.

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

The district has purchased air purifiers for each classroom, office and meeting room in the district. Staff is encouraged to leave at least two windows ajar, weather and conditions permitting, to increase the amount of clean air in to the building.

### **Cleaning and disinfecting**

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

Our maintenance/facilities department performs thorough cleaning on high traffic areas throughout the day and the end of each day. They frequently disinfect commonly used surfaces including doorknobs, sinks, handwashing facilities and water fountains. The staff ensures that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels and hand sanitizer when needed. The department has purchased products that are approved for use against the spread of COVID-19 and on the Environmental Protection Agency (EPA) approved list. They use disinfectants labeled to be effective against emerging viral pathogens, diluted household bleach solutions (5 tablespoons per gallon of water) or alcohol solutions with at least 70% alcohol that are appropriate for the surface. They provide employees training on manufacturer's directions and Cal/OSHA requirement for safe use.

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

Immediately place the classroom and those in close contact in to quarantine, notify maintenance department to close room and perform a deep clean of the areas impacted by the presence of a positive case, notify the food services department of the positive case, continue to do a thorough contact tracing (on campus contacts) to ensure all persons that may have been exposed are notified, communicate the positive case to SCOE and the local public health department for notification purposes, but also to collaborate to ensure proper safeguards are being taken to prevent the spread of COVID.

### **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:

the employee will be provided approved disinfectant wipes, encourage handwashing before and after use of such equipment.

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:

have trained and provided education about the importance of frequent handwashing and/or sanitizing, provided adequate soap and sanitizer for such purposes, encourage all individuals to take the time during the day to ensure proper hygiene practices, and encourage all individuals to use hand sanitizer upon entering and exiting a room and/or building.

### **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.

The district provides surgical style masks and cloth masks to students and staff.

### **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:

Report to their direct supervisor, site administrator, school nurse or district office their potential exposure, they will then be required to adhere to the recommendations set forth by our school nurse or the Health Services Director at SCOE, and then work with our Human Resources personnel on appropriate leave that coincides with current state and local mandates. The employee will then work with the site administrator to determine the most suitable work environment and expectations during the quarantine period. The district has a confidential template used by our Health Services Department to track each possible and positive case within our district. This form has been implemented since October 2020 and is as thorough as Appendix C.

### **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 illness and/or exposure to either their direct supervisor, site administrator, district office and/or school nurse. The employee should do so without fear of reprisal. The district will either supply a COVID-19 test or pay for an employee to receive a COVID-19 test when appropriate. For employees that may have medical or other conditions, the district will enter in to the Interactive Process to ensure appropriate accommodations are being made for that employee. All employees have been trained and received information about potential health dangers of COVID and all employees have received notification about up-to-date policies relating to COVID-19 leave time. All employees have been trained through the Keenan SafeSchools regarding COVID-19. Staff receive weekly email communication from SCOE, the school nurse and district office about facts, reminders and information relating to the pandemic.

- 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:

Employees are afforded the opportunity to take a COVID-19 test provided and administered by the school nurse, or obtain a test from local agencies that provide such tests. This will be of no cost to the employee.

- 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.

The encouragement of students and staff to stay at home when they are not feeling well. As, we have been open since October, 2020, our training has occurred in the early fall, weekly updates, weekly emails by Health Services and updates as they arise via the CDPH Guidelines. Therefore, training has been established and is ongoing.

**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 workers compensation benefits, sick leave benefits and other Federal, State, Local benefits including California Education Code. Although federal COVID leave ended on 12/31/20, the district has decided to extend the parameters of that leave for the remainder of the school year, or the end of the pandemic. Our county public health has lowered the mandatory quarantine duration to 7-10 days and NOT the 14 days as stated in bullet #2 above.

- 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.

Keep an up-to-date list of students and staff that are impacted by either positive COVID-19 test, exposure to a positive case and/or close contact with a positive case. This is a confidential data base updated by our Health Services Department on a daily basis. As stated previously, our Health Services Department is using a confidential spreadsheet to keep record of and track all COVID-19 related cases, per bullet #5 above.

### **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.

Chris Harris

**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:**

<b>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</b>	<b>Places and times</b>	<b>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</b>	<b>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</b>

## Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

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

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Administrative</b>			
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			

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

## 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:**

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

<b>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):</b>	
---	--

<b>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:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

\*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