

COVID-19 Prevention Program (CPP)
for
Big Springs Elementary Union School District

Board Adopted: January 2020

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

Date: 1/1/21

Authority and Responsibility

The Superintendent/Principal 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: participating in Keenan Safe Schools training modules as well as School Nurse trainings.

We screen our employees by: Asking employees to self-screen according to the CDPH guidelines at home. If they are experiencing any symptoms to report them directly to the Superintendent/Principal. If they do not have symptoms, come to work where they will be fever screened with a non-contact thermometer at the front entrance. Upon entering campus they must be wearing a face covering, if they do not have one, one will be provided. They will wash their hands before beginning their work day as well.

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 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.

Control of COVID-19 Hazards

Physical Distancing

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

- a. Plan to limit the number of people in all campus spaces to the number that can be reasonably accommodated while maintaining a minimum of 6 feet of distance between individuals. (6 feet is the current minimum recommendation for physical distancing from the CDC, but it is important to pay attention to future modifications in public health recommendations.)
- b. To the extent possible, and as recommended by the CDC, attempt to create smaller student/ educator cohorts to minimize the mixing of student groups throughout the day. Minimize movement of students, educators, and staff as much as possible.
- c. In a circumstance where sufficient physical distancing is difficult or impossible, such as when students enter or exit a school bus in proximity to the bus driver, all individuals, including staff and students, should wear face coverings that cover the mouth and nose consistent with public health guidance. To be clear, face coverings are not a replacement for physical distancing, but they should be used to mitigate virus spread when physical distancing is not feasible.
- d. Student Physical Distancing. LEAs should plan to:

- i. Limit number of students physically reporting to school, if needed to maintain physical Distancing.

1. Determine student and staff capacity of each school meeting 6-foot physical distancing objectives.
 2. Consider various strategies outlined in the Instructional Program Models in the guidance document, such as early/late start times and blended learning models.

- ii. The CDC recommends virtual activities in lieu of field trips and intergroup events.

- iii. Post signage and install barriers to direct traffic around campus.

- iv. Buses

1. Determine maximum capacity for students of each vehicle while meeting 6-foot physical distancing objectives.
 2. Create a plan for seating based on maximum capacity determined above, and develop a plan for bus routes that accommodates the capacity limitations. Mark or block seats that must be left vacant. Sample seating options:

- A. Option 1: Seat one student to a bench on both sides of the bus, skipping every other row. (Siblings can sit together)

- B. Option 2: Seat one student to a bench, alternating rows on each side to create a zigzag. (Siblings can sit together)

3. Instruct students and parents to maintain 6-foot distancing at bus stops and while loading and unloading.
 4. Seat students from the rear of the bus forward to prevent students from walking past each other. To prevent students from walking past one another, afternoon runs should be boarded based on the order in which students will be dropped off. (Students who get off first should board last and sit in the front.)
 5. Students and staff should wear face coverings at bus stops and on buses.

Playgrounds/Outside Spaces/Athletics

1. Increase supervision to ensure physical distancing.
2. Physical education (PE) and intramural/interscholastic athletics should be limited to activities that do not involve physical contact with other students or equipment until advised otherwise by state/local public health officials.

vi. Classrooms

1. Determine maximum capacity for students of each classroom while meeting 6-foot physical distancing objectives.
2. In accordance with CDC and CDPH guidance, ensure desks are a minimum of 6 feet apart and arrange desks in a way that minimizes face-to-face contact.

3. If necessary, utilize other campus spaces for instructional activities (e.g., lecture halls, gyms, auditoriums, cafeterias, outdoors).
4. If necessary, broadcast to other classrooms and students distance learning at home.
5. Increase staffing to ensure physical distancing for younger students and students with special needs.
6. Arrange developmentally appropriate activities for smaller group activities and rearrange furniture and play spaces to maintain separation, when possible.
7. Address physical distancing objectives as students move between classrooms.
8. Address potential issues from physical distancing rules that could result in unintended segregation of students with disabilities on campuses away from peers without disabilities.

vii. Food Service

1. Consider strategies to limit physical interaction during meal preparation and meal service (e.g., serving meals in classrooms, increasing meal service access points, staggering cafeteria use).
2. Suspend use of share tables and self-service buffets for food and condiments.
3. Install physical barriers, such as sneeze guards and partitions, at point of sale and other areas where maintaining physical distance of 6 feet is difficult.
4. With an approved National School Lunch Program waiver, offer meal delivery for students quarantined or in a home-based cohort.
5. If providing meal service in classrooms, plan for cleaning and trash removal.

e. Staff

- i. Develop a plan that ensures physical distancing among staff in their work environment to reduce spread of the virus that includes:
 1. Avoiding staff congregation in work environments, break rooms, staff rooms, and bathrooms.
 2. Avoiding grouping staff together for training or staff development. Consider conducting the training virtually or, if in-person, ensure distancing is maintained.
 - ii. Adjust staff schedules (through negotiations) to accommodate new student schedules and physical distancing strategies.
 - iii. In accordance with Cal/OSHA regulations and guidance, evaluate all workspaces to ensure that employees can maintain physical distancing to the extent possible.
1. Where possible, rearrange workspaces to incorporate a minimum of 6 feet between employees and students.
2. If physical distancing between workspaces or between employees and students and visitors is not possible, add physical barriers that cannot be moved to separate workspaces.

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. If at any point an employee needs a mask, one is provided for them. Face coverings can also be washed on campus as well. Employees choosing to not wear a face covering will not be granted access on campus.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside

air supply to the area, if indoors, has been maximized to the extent possible.

- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.
 - a. According to CDC guidance:
 - i. Training and information should be provided to staff and students on proper use, removal, and washing of cloth face coverings.
 - ii. Face coverings are not recommended for anyone who has trouble breathing or is unconscious, incapacitated, or otherwise unable to remove the covering without assistance. LEAs should make reasonable accommodations such as a face shield with a cloth drape for those who are unable to wear face coverings for medical reasons. Per Cal/OSHA, considerations for face shields should include a cloth drape attached across the bottom and tucked into shirt.
 - iii. Cloth face coverings are meant to protect other people in case the wearer is unknowingly infected (many people carry COVID-19 but do not have symptoms). Cloth face coverings are not surgical masks, respirators, or personal protective equipment.
 - b. Staff Protective Equipment
 - i. As recommended by the CDC, all staff should wear face coverings. Per CDPH guidance, teachers could use face shields, which enable students to see their faces and to avoid potential barriers to phonological instruction.
 - ii. Provide masks if the employee does not have a clean face covering.
 - iii. Provide other protective equipment, as appropriate for work assignments.
 - iv. Masks and face shields are provided for all staff.
- 1. For employees engaging in symptom screening, provide surgical masks, face shields, and disposable gloves.
- 2. For front office and food service employees, provide face coverings and disposable gloves.
- 3. For custodial staff, provide equipment and PPE for cleaning and disinfecting, including:
 - A. For regular surface cleaning, provide gloves appropriate for all cleaning and disinfecting.
 - B. Classified staff engaged in deep cleaning and disinfecting should be equipped with proper PPE for COVID-19 disinfection (disposable gown, gloves, eye protection, and mask or respirator) in addition to PPE as required by product instructions. All products must be kept out of children's reach and stored in a space with restricted access.
 - C. Cal/OSHA requires that PPE be provided and worn to effectively protect employees from the hazards of the cleaning products used and training be provided to staff on the hazards of chemicals.
- c. Student Protective Equipment
 - i. Students should use cloth face coverings, especially in circumstances when physical distancing cannot be maintained. If an LEA requires students to wear face coverings, then the LEA must provide face coverings to be used. Consider how the LEA will address students with disabilities who refuse or are not able to wear masks. At a minimum, face coverings should be worn:
 - 1. While waiting to enter the school campus.
 - 2. While on school grounds (except when eating or drinking).
 - 3. While leaving school.
 - 4. While on a school bus.
- A. Driver has access to surplus masks to provide to students who are symptomatic on the Bus.

Engineering controls

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

individuals: plexiglass table dividers

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

- i. In accordance with CDC guidance, the District will ensure that ventilation systems and fans operate properly and increase circulation of outdoor air as much as possible by opening windows and doors and other methods. Do not open windows and doors if doing so poses a safety or health risk to children using the facility (for example, allowing pollen in or exacerbating asthma symptoms). Maximize central air filtration for heating, ventilation, and air conditioning (HVAC) systems (targeted filter rating of at least MERV 13).
- f. Take steps to ensure that all water systems and features (e.g., drinking fountains, decorative fountains) are safe to use after a prolonged facility shutdown to minimize the risk of Legionnaires' disease and other diseases associated with water.
- g. Keep each child's belongings separated and in an individually labeled storage container, cubby, or area. Send belongings home each day to be cleaned

Cleaning and disinfecting

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

- a. Overall Cleanliness Standards. Schools must meet high cleanliness standards prior to reopening and maintain a high level during the school year.
- b. In accordance with CDC guidance, avoid sharing of electronic devices, toys, books, and other games or learning aids.
- c. Limit stuffed animals and any other toys that are difficult to clean and sanitize.
- d. In accordance with CDC and California Department of Pesticide Regulation (CDPR) guidance, and in consultation with local public health officials, develop a plan that includes:
 - i. A safe and correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning.
 - ii. Disinfecting surfaces between uses, such as:
 1. Desks and tables
 2. Chairs
 3. Seats on bus
 4. Keyboards, phones, headsets, copy machines
 - iii. Disinfecting frequently—at least daily—high-touch surfaces, such as:
 1. Door handles
 2. Handrails
 3. Drinking fountains
 4. Sink handles
 5. Restroom surfaces
 6. Toys, games, art supplies, instructional materials
 7. Playground equipment
 - iv. When choosing disinfecting products, using those approved for use against COVID-19 on the Environmental Protection Agency (EPA) List N: Disinfectants for Use Against SARS-CoV-2 and follow product instructions.
 1. To reduce the risk of asthma related to disinfecting, programs should aim to select disinfectant products on the EPA List N with asthma-safer ingredients (hydrogen peroxide, citric acid, or lactic acid).
 2. Avoid products that mix these ingredients with peroxyacetic acid, sodium hypochlorite (bleach), or quaternary ammonium compounds, which can cause asthma.
 3. Use disinfectants labeled to be effective against emerging viral pathogens, following label

directions for appropriate dilution rates and contact times.

- v. When cleaning, airing out the space before children arrive. Plan to do thorough cleaning when children are not present.
- vi. Closing off areas used by any sick person and not using before cleaning and disinfection. To reduce risk of exposure, wait 24 hours before cleaning and disinfecting. If it is not possible to wait 24 hours, wait as long as possible.

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 use of the disinfectant fogger machine and/or hourly sanitization.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- a. Handwashing. In accordance with CDPH and Cal/OSHA guidance and in consultation with local public health officials, develop a plan for handwashing that includes:
 - i. Providing opportunities for students and staff to meet handwashing frequency guidance.
 - ii. Ensuring sufficient access to handwashing and sanitizer stations. Consider portable handwashing stations throughout a site and near classrooms to minimize movement and congregations in bathrooms to the extent possible.
 - iii. Ensuring fragrance-free hand sanitizer (with a minimum of 60 percent alcohol) is available and supervised at or near all workstations and on buses. Children under age nine should use hand sanitizer under adult supervision. Call Poison Control if consumed: 1-800-222-1222. Note: frequent handwashing is more effective than the use of hand sanitizers.

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.

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 their working hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.]

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.
 - 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.
 - As testing is not required, employees can access COVID-19 testing by a monthly testing clinic held on campus. The purpose is to give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work.
 - 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.
- a. School leaders should engage stakeholders, including families, staff, and labor partners in the school community, to formulate and implement the plans in this checklist.
- b. Communicate to staff, students, and parents about new, COVID-19-related protocols, including:
- i. Proper use of PPE/EPG.
 - ii. Cleanliness and disinfection.
 - iii. Transmission prevention.
 - iv. Guidelines for families about when to keep students home from school.
 - v. Systems for self-reporting symptoms.
 - vi. Criteria and plan to close schools again for physical attendance of students.
- c. Target communication for vulnerable members of the school community.
- d. Create a communications plan for if a school has a positive COVID-19 case.
- i. Address the school's role in documenting, reporting, tracking, and tracing infections in coordination with public health officials.
 - ii. Notify staff and families immediately of any possible cases of COVID-19. Review legal responsibilities and privacy rights for communicating about cases of the virus.
 - iii. Provide guidance to parents, teachers, and staff reminding them of the importance of community physical distancing measures while a school is closed, including discouraging students or staff from gathering elsewhere.
 - iv. Provide information to parents regarding labor laws, Disability Insurance, Paid Family Leave, and Unemployment Insurance.
 - v. Advise sick staff members and children not to return until they have met CDC criteria to discontinue home isolation.
 - vi. Inform those who have had close contact with a person diagnosed with COVID-19 to stay home and self-monitor for symptoms and to follow CDC guidance if symptoms develop. If a person does not have symptoms follow appropriate CDC guidance for home isolation.

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.
- Employees will be required to complete Keenan Safe Schools trainings on COVID-19 in the workplace.

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 utilizing the Families First Coronavirus Relief Act when applicable.
- 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.

- o At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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Board of Trustees Approved: January 2020

Appendix B: COVID-19 Inspections

[This form is only intended to get you started. Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
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: [enter date]

Name of person conducting the investigation: [enter name(s)]

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):

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:

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

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

Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature