

# **Covid-19 Prevention Program (CPP) for Johnstonville Elementary School District (JESD) – Addendum to the Injury Illness and Prevention Plan (IIPP)**

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

**Date:** January 27, 2021

## **Authority and Responsibility**

Scott Smith, Superintendent/Principal, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, the Superintendent/Principal, or designee, is 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 daily screenings, appropriately wearing a mask in all indoor areas, social distancing, and reporting any situations in the workplace that may need to be addressed.

## **Employee screening**

We screen our employees by using temperature checks through the use of non-contact thermometers. In addition, employees are encouraged to self-screen according to CDPH guidelines. All Johnstonville Elementary School District employees, both the screener and employee, shall wear face coverings during the screening process.

## **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:

1. The interaction, area, activity, work task, process, equipment and material that potentially exposes employees to Covid-19 hazards will be evaluated.
2. The approximate place and time of the potential exposure will be noted.

3. Potential exposure for Covid-19 and employees affected, including members of the public and employees of other employers will be documented.
4. Existing and/or additional Covid-19 prevention controls, including barriers, partitions and ventilation, will be considered when assessing the potential exposure and reduction of future exposures.

## **Control of Covid-19 Hazards**

### **Physical Distancing**

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

- Limiting the number of employees and gatherings in the workplace, including visitors.
- Visual cues such as signs and floor decals to indicate where employees and others should be located upon entry.
- Staggered arrival, lunches, and break times.
- Ensuring all employee workstations are at least six feet apart.

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, on an as needed basis, 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. All employees and visitors will be provided a face covering, on an as needed basis, during the workday. Any employee noticing another employee not wearing a face covering, or not wearing a covering properly, should report the incident immediately to the Superintendent/Principal.

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.

Any employee not wearing a face covering for any reason, shall be at least six feet apart from all other persons unless the unmasked employee has an exemption as outlined by California Department of Public Health and is tested at least weekly for Covid-19.

### **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet between individuals and individuals are face-to-face due to limited classroom space: Plastic barriers and Plexiglas.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by: opening windows and doors when possible and when weather permits, and the installation of HEPA/MERV13 filters that are changed at the recommended intervals that pertain to the Covid-19 pandemic.

### **Cleaning and disinfecting**

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

- Ensure adequate supplies and adequate time for daily cleaning and sanitizing.
- Notifying employees of additional deep cleaning or sanitizing that needs to take place.
- Cleaning and sanitizing will occur on a daily basis, minimally once a day. Additional times will occur during the day for high contact areas.

Should Johnstonville Elementary School District have a Covid-19 case in the workplace, we will implement the following procedures as outlined in District’s Revised Reopening Plan. The Superintendent/Principal, custodians, and maintenance personnel will ensure all areas are cleaned and sanitized during a high-risk exposure period.

### **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 last employee who used the item. Individual classroom cleaning and sanitizing caddies have been created to help facilitate this disinfection process.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Evaluate handwashing facilities.
- Installed hand sanitizer stations in all classrooms and rooms where staff frequent.
- Provide soap and paper towels at all sinks.
- Encourage employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands often with soap and water for at least 20 seconds or use hand sanitizer with at least 60% alcohol, if soap and water are not available. Key times for employees to clean their hands include:
  - a. Before and after work shifts
  - b. Before and after work breaks
  - c. After blowing their nose, coughing, or sneezing
  - d. After using the restroom
  - e. Before eating or preparing food
  - f. After putting on, touching, or removing cloth face coverings

### **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.

## **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:

- Covid-19 tested at no cost during office hours and may occur off-site depending on the availability of testing.
- Provided information on benefits described in Training and Instruction, and Exclusion of Covid-19 cases, will be provided to employees.

## System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees that it includes the following information:

- Employees should report Covid-19 symptoms and possible hazards immediately to the Superintendent/Principal. If the Superintendent/Principal is not available, the employee is to report to the Chief Business Officer (CBO)
- Employees can report symptoms and hazards without fear of reprisal.
- The District's 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, employees can access Covid-19 testing through Lassen County Public Health or their medical provider.
- 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, when practicable, 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.
- Keenan SafeSchools training modules.

**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, or will follow current CDPH or Local Health Department guidelines.

- 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 using available employee’s sick leave benefits or other available leave due to the employee.
- 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..
- 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 14 days have passed since Covid-19 symptoms first appeared. The count of days are subject to change based on county and/or state public health official’s recommendations.
- Covid-19 cases who tested positive but never developed Covid-19 symptoms will not return to work until a minimum of 14 days have passed since the date of specimen collection of their first positive Covid-19 test. The count of days are subject to change based on county and/or state public health official’s recommendations.
- 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 14 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective. In addition, the above listed Return-to-Work criteria must be met.

Scott Smith, Ph.D. Superintendent/Principal

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, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be for 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 employee and authorized employee representative that participated:**

Interaction, area, activity, work task, process, equipment or 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
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
<b>Administrative</b>			
Physical distancing, when practicable			
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			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			

## 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>	

**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>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 who 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 who 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.



## **Additional Consideration #1**

### **Multiple Covid-19 Infections and Covid-19 Outbreaks**

This section will only be utilized if Johnstonville Elementary School District is identified by a local health department as the location of a Covid-19 outbreak, or there are three or more employee Covid-19 cases in the Johnstonville Elementary School District workplace within a 14-day period. If this section is activated, it will stay in effect until there are no new employee Covid-19 cases detected in our workplace for a 14-day period.

#### **Covid-19 testing**

- We will provide Covid-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. Covid-19 testing will be provided at no cost to employees during employees' working hours.
- Covid-19 testing consists of the following:
  - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative Covid-19 test results of employees with Covid-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
  - After the first two Covid-19 tests, we will continue to provide Covid-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new Covid-19 cases detected in our workplace for a 14-day period.
  - We will provide additional testing when deemed necessary by Cal/OSHA.

#### **Exclusion of Covid-19 cases**

We will ensure Covid-19 cases and employees who had Covid-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of Covid-19 Cases** and **Return to Work Criteria** requirements and local health officer orders if applicable.

#### **Investigation of workplace Covid-19 illness**

We will immediately investigate and determine possible workplace-related factors that contributed to the Covid-19 outbreak in accordance with our CPP **Investigating and Responding to Covid-19 Cases**.

#### **Covid-19 investigation, review and hazard correction**

In addition to our CPP **Identification and Evaluation of Covid-19 Hazards** and **Correction of Covid-19 Hazards**, we will immediately perform a review of potentially relevant Covid-19 policies, procedures, and controls and implement changes as needed to prevent further spread of Covid-19.

The investigation and review will be documented and include:

- Investigation of new or unabated Covid-19 hazards including:
  - Our Covid-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing, when practicable.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized Covid-19 hazards.
  - When otherwise necessary.
- Implementing changes to reduce the transmission of Covid-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.

- Improving air filtration.
- Increasing physical distancing as much as possible, when practicable.

#### **Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more employee Covid-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of Covid-19 within the workplace.
- We will provide to the local health department the total number of employee Covid-19 cases, and for each employee Covid-19 case: the name, contact information, occupation, and workplace address of the Covid-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent Covid-19 cases at our workplace.