



Board Policy Manual

As approved by the Board of Directors on
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SECTION 1 - BOARD GOVERNANCE – SCHOOL BOARD MEETINGS – BROWN ACT COMPLIANCE

All meetings of the Board of Directors and its committees shall be called, noticed, and held in compliance with the provisions of the Ralph M. Brown Act (Chapter 9 (commencing with Section 54950) of Division 2 of Title 5 of the Government Code) as said chapter may be modified by subsequent legislation (“Brown Act”).

Types of Meetings

Regular Meetings

Regular meetings of the Board of Directors of Compass Charter Schools (“Board”) shall be held consistent with the calendar for such meetings as established by the Board each year.

If at any time any regular meeting falls on a holiday (Federal, State or local), such regular meeting shall be held on the next business day or as noticed.

Special Meetings

The Chair of the Board or a majority of the members of the Board may call special meetings on an as-needed basis, consistent with the requirements of the Brown Act.

Emergency Meetings

A Board majority may call an emergency meeting when an emergency situation arises involving matters upon which prompt action is necessary due to the disruption or threatened disruption of public facilities in compliance with the Brown Act.

Notification of Meetings

Regular Meetings

No later than 72 hours prior to a regular meeting, the Charter School shall post an agenda containing a brief general description of each item of business to be transacted or discussed at the meeting. The agenda will be posted in a location that is freely accessible to members of the public, and on the School’s website. The agenda and agenda packet will be provided to all Board members and to all persons that have requested a copy of the agenda and/or the agenda packet in compliance with the Brown Act. It is the President & CEO’s, or designee’s, responsibility to distribute copies of the agenda and the agenda packet for regular meetings.

Special Meetings

No later than 24 hours prior to a special meeting the Charter School shall post an agenda containing a brief general description of each item of business to be transacted or discussed at the meeting.

The agenda will be posted in a location that is freely accessible to members of the public, and on the School’s website, not later than 24 hours prior to a special meeting. The agenda and agenda packet will be provided to all Board members and to all persons that have requested a copy of the agenda and/or the agenda packet in compliance with the Brown Act. It is the President & CEO’s, or designee’s, responsibility to distribute copies of the agenda and the agenda packet for

special meetings.

Emergency Meetings

In the case of an emergency situation, as defined by the Brown Act, involving matters upon which prompt action is necessary due to the disruption or threatened disruption of public facilities, notice to the Board will be provided as soon as is reasonably practicable under the circumstances. All media outlets that have requested notice of special meetings shall be notified one hour prior to the emergency meeting, or in the case of a dire emergency, at or near the time that the Board members are notified of the emergency meeting. The notice shall be given by telephone and all telephone numbers provided by the media outlet in the request for notice shall be exhausted. If telephones services are not functioning, the notice requirement is waived and the media shall be notified of the fact of the holding of the emergency meeting, the purpose of the meeting and any action taken at the meeting as soon after the meeting as possible.

Request for Notice

Any person who has requested a copy of the agenda and/or agenda packet in writing, will be mailed a copy of the requested materials at the time the agenda is posted or upon distribution to all, or a majority of all, of the members of the Board, whichever occurs first.

Agendas

Preparation of Agenda and Process

The President & CEO of Compass Charter Schools (“CCS”) shall be responsible for preparing the agendas for all meetings of the Board.

The President & CEO shall include items on the agenda that are requested by Board members and relate to school business if the requested agenda items are determined by the Chair of the Board to be appropriate for discussion at that meeting. In addition, a member of the public may request that a topic directly related to school business be placed on the agenda. The Chair of the Board shall determine, in his/her discretion, whether the agenda item requested by a member of the public shall be placed on the agenda.

Requests for items to be included on the agenda shall be in writing and submitted to the President & CEO’s office no later than seven (7) business days prior to the next regularly scheduled Board meeting.

Contents of the Agenda

The agenda shall include the following information:

- 1) Time and location of the meeting, including, if applicable, any teleconferencing location(s);
- 2) A brief general description of all items of business to be transacted or discussed at the meeting, including those items to be discussed in closed session. Closed session items must be described in accordance with Government Code Section 54954.5;

- 3) An opportunity for members of the public to directly address the Board in accordance with the Brown Act and the Board's public comment policy (addressed below);
- 4) If teleconference locations are being utilized, an opportunity for members of the public to address the Board directly at each teleconference location; and
- 5) Information regarding how, to whom and when a request for disability related modification or accommodation, including auxiliary aids or services, may be made by a person with a disability who requires a modification or accommodation in order to participate in the public meeting.

Supporting Information Relating to Agenda Items

The President & CEO is responsible for preparing all supporting information that may accompany each agenda topic originating from the administration or the Board.

The purpose of preparing supporting information is to facilitate decision-making on the part of the Board members by having available to them in advance of Board meetings comprehensive information pertaining to each agenda topic. The supporting information shall, to the extent possible, accompany the agenda and be delivered to the Board members concurrently with the agenda.

If supporting materials are distributed to Board members during a public meeting, such materials will be made available for public inspection at the meeting if prepared by the President & CEO. If such materials are prepared by some other person, they shall be made available after the meeting at which they were distributed. AAS may charge a fee or deposit for a copy of such materials pursuant to Government Code Section 6253.

These materials will be made available in appropriate alternative formats upon request by a person with a disability, as required by the Americans with Disabilities Act. No surcharge will be imposed on persons with disabilities in violation of the Americans with Disabilities Act.

Members of the public who request to have a topic placed on the agenda are encouraged to submit, in writing, supporting information detailing their reason for having the topic placed on the agenda and what is being requested of the Board. In the event that the requested topic is placed on the agenda, the supporting information will provide background information for Board members to help expedite the Board's handling of the topic at the Board meeting.

Board Meetings

Open Session

All meetings of the Board shall be open to the public and the media, except that the Board may hold closed sessions as authorized by the Brown Act.

Public Participation at Meetings

Public comment generally: At a regular meeting, any person may address the Board concerning any item on the agenda and any other matters within the Board's subject matter jurisdiction. At a special meeting, any person may address the Board only concerning the items on the agenda. The

total time devoted to presentations to the Board on all public comment (including agenda items and non-agenda items at regular meetings) shall not exceed one-half hour, unless additional time is granted by the Board. Members of the public may speak for up to two (2) minutes on agenda and non-agenda items. At the discretion of the Chair of the Board, the two (2) minute time limit may be extended to three (3) minutes.

Members of the public desiring Board action on an item are encouraged to seek placement of the issue on the Board agenda in accordance with this policy rather than presenting the matter during general public comment. This will facilitate discussion and expedite resolution since the Board cannot discuss items in a meeting that are not on the agenda. This policy is not intended to prevent the public from providing public comment in line with this policy.

Willful interruption of Board meeting: In the event that any meeting is willfully interrupted by a group(s) of persons so as to render the orderly conduct of such meeting unfeasible and order cannot be restored by the removal of individuals who are willfully interrupting the meeting, the Board may order the meeting room cleared and continue the session. Only matters appearing on the agenda may be considered in such a session. Representatives of the press or other media, if not participating in the disturbance, shall be allowed to attend any such session

Time for public comment: All public comment concerning all matters shall be heard prior to the Board's consideration of the agenda items.

Recording and/or broadcasting of meeting: Persons attending an open meeting have the right to record or broadcast the proceedings with an audio or video recorder or a still or motion picture camera unless the Board reasonably finds that the recording or broadcast cannot continue without noise, illumination or obstruction of view that constitutes, or would constitute a persistent disruption of the proceedings.

Requests to address the Board: Prior to the beginning of the meeting, members of the public seeking to address the Board on agenda and non-agenda items may complete a, "Request to Address the Board" form (located in the Board Meeting Room), and give it to the Chair of the Board or Board Secretary, or his or her designee.

Board Members at Meetings

Board discussion and action: No action or discussion shall be taken on any item not appearing on the posted agenda. However, at a regular meeting, Board members or staff may briefly respond to statements made or questions posed by persons during public comment. At regular meetings, a Board member may, on his/her own initiative or in response to a question posed by the public, ask a question for clarification, make a brief announcement or make a brief report on his/her own activities. Additionally, a Board member may provide a reference to staff or other resources for factual information, request staff to report back to the Board at a subsequent meeting concerning any matter, or take action to direct staff to place a matter of business on a future agenda.

Exceptions in regular meetings: In regular meetings, the Board may take action on items of business not appearing on the posted agenda if any of the following conditions apply: 1) A

majority of the Board determines that an emergency situation exists as defined by the Brown Act; 2) A determination by a two-thirds vote of the Board members present at the meeting, or if less than two-thirds are present, a unanimous vote of those Board members present, that there is a need to take immediate action and that the need for action came to the attention of the Board after the agenda was posted; or 3) The item was properly posted for a prior meeting occurring not more than five (5) calendar days prior to the date action is taken on the item, and at the prior meeting, the item was continued to the meeting at which action is being taken. If items are discussed under these conditions, the Chair of the Board shall publicly identify the item(s).

Closed session: Prior to holding any closed session, the Board shall disclose, in open session of the meeting, the basis for holding a closed session pursuant to Government Code Section 54954.5. The disclosure may take the form of a reference to the item(s) as they are listed by number or letter on the agenda. In the closed session, the Board may only consider the disclosed closed session agenda items.

After any closed session, the Board shall reconvene into open session prior to adjournment and make a report of any action taken in closed session and the vote or abstention of every Board member present thereon in accordance with Government Code Section 54957.1.

Minutes of Board Meetings

Open Session: Board meeting minutes shall include the time and place that the meeting was held; whether the meeting was annual, regular, special, or emergency and, if special or emergency, how authorized; the notice given; the names of directors present at the meeting, state all motions made, document the names of Board members making and seconding motions, and state the vote or abstention of each Board member present for each action taken. The minutes pertaining to open session may also record the recommendations of the administration and the general substance of the Board's discussion or the general substance of statements pertinent to Board's business made by members of the staff or public.

Closed Session: Minutes will not be taken during Closed Session.

Minutes for Emergency Meetings: Any time an emergency meeting is held, the minutes must provide a list of persons who were notified or attempted to be notified, a copy of the roll call vote, and any actions taken at the meeting. The minutes will be posted for a minimum of 10 days in a public place as soon after the meeting as possible.

Storing the minutes: The official minutes of the Board shall be kept in a fireproof storage box. The following documents shall be bound with the official minutes and referred to in the text of the minutes to which they apply:

- Original copies of all resolutions unless required by other agencies, in which case photocopies of the originals may be substituted;
- Original copies of all budget transfers;
- Copies of any document determined by the Board to be attached to the official minutes;
- and

- Other documents which, in the opinion of the Secretary, are necessary to fully substantiate or record Board action.

In addition to the official minutes, an additional copy of all minutes and attached documents shall be maintained in the office of the Secretary of the Board. This set of minutes shall be bound, indexed by those categories detailed above and by subject.

Quorum Requirements

A majority of the directors then in office shall constitute a quorum of the Board, which is necessary for the Board to transact business. All motions, in order to pass, need positive action by at least a majority of the directors present at a duly held meeting at which a quorum is present. Should there be less than a majority of the Board present at the inception of any meeting, the meeting shall be adjourned.

Continuances and Adjournment

Continuances

Items appearing on agendas for regular meeting may be continued to another meeting, to be held within five (5) calendar days from the date of the originally posted meeting, without triggering the requirement that the agenda item be re-posted with the requisite notice.

Adjournment

The Board may adjourn any regular or special meeting to a time and place specified in an order of adjournment. Less than a quorum may so adjourn from time to time. If all members are absent from any regular meeting, the Board Secretary may declare the meeting adjourned to a stated time and place and he/she shall cause a written notice of adjournment to be given. A copy of the notice of adjournment shall be conspicuously posted on or near the door of the place where the regular or special meeting was held within 24 hours after the time of adjournment. When a regular meeting is adjourned, the resulting adjourned regular meeting is a regular meeting for all purposes. When an order of adjournment fails to state the hour at which the adjourned meeting is to be held, it shall be held at the hour specified for regular meetings.

SECTION 2 - BOARD GOVERNANCE – BOARD OPERATIONS

Roberts Rules of Order

Absent a policy to the contrary and to the extent consistent with the Brown Act, the business of the Board of Directors (the “Board”) at its meetings will be conducted in accordance with Roberts Rules of Order. Any member may raise a point of order under these rules, which action shall take precedence over all other business before the Board.

Polling of Board of Directors

Voting on resolutions shall be executed through the polling of Board members. Secret ballots and proxies are prohibited.

Officers, Directors and School Liability Insurance

The School will maintain adequate insurance to cover all risks associated with school activities and operations.

Appointment of Board Committees

Consistent with the charters, Bylaws, and any other applicable provisions of contract or law, the Board may appoint committees for any purpose deemed appropriate by the Board. The resolution establishing the committee shall clearly define the range of the committee’s responsibility and authority, and shall specify whether the committee shall be a standing or limited-term committee. In meeting and carrying out designated purposes, any such committee shall comply with any applicable legal or contractual requirements.

Board Appointment/Nomination Process

The Board shall carry out its appointment and nomination process consistent with the requirements of its charters and Bylaws. Should the charters and Bylaws not address any issue which may arise, the Board may adopt policies or regulations which address such concerns. Should the Board wish to alter its appointment or nomination process, it must do so consistent with any requirements of its charters, unless the charters are revised.

SECTION 3 - BOARD GOVERNANCE - PUBLIC RECORDS REQUESTS – PUBLIC RECORDS ACT COMPLIANCE

Public Records

Public Records Defined

CCS provides the public with access to its public records in accordance with legal requirements. Public records are those writings containing information relating to the conduct of CCS' business that are prepared, owned, used or retained by CCS regardless of physical form or characteristics. Certain public records, however, are exempt from disclosure by express provision of law. These records will not be disclosed to the public. CCS may not deny disclosure of public records based on the purpose for which the record is being requested.

Records Exempt from Disclosure

Public access shall not be given to records listed as exempt from public disclosure in the California Public Records Act or other applicable statutes. Some of the more common exemptions are:

- Preliminary drafts, notes or inter/intra-school memoranda that are not retained by the School in the ordinary course of business, when the public interest in withholding clearly outweighs the public interest in disclosure;

Records pertaining to pending litigation to which CCS is a party or to claims filed against the CCS, which were created in connection with the litigation or claims and were intended to be confidential, until the pending litigation or claim has been finally adjudicated or otherwise settled.;

- Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy;
- Test questions, scoring keys and other examination data used to administer an examination for employment or academic examination, unless specifically authorized by law.
- The content of real estate appraisals or engineering or feasibility estimates and evaluations made for or by CCS relative to the acquisition of property, until all of the property has been acquired or all of the contract agreement obtained.
- Records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege. This includes student records protected from disclosure under the Family Educational Rights and Privacy Act ("FERPA"), a federal statute that protects the privacy interests of parents and students with regard to education records;
- A document prepared by or for CCS that assesses its vulnerability to terrorist attack or

other criminal acts intended to disrupt CCS operations and that is for distribution or consideration in a closed session.

- Records where, on the facts of the particular case, the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

CCS may, in its discretion and as permitted by law, waive the applicable exemption to the records. In this case, the disclosure constitutes a waiver for all requestors of that public record and will be open to public inspection.

Process for Requesting Public Records

Requests for Public Records

Any person wishing to inspect CCS' public records shall make the request, preferably in writing, to the: **President & CEO, CCS, 850 Hampshire Road Suite P, Thousand Oaks, CA 91361.** While a request need not be in writing, if the request is verbal, the requestor will be asked to reduce the request to writing so there is a written record of the records being requested. If the requestor chooses not to reduce the request to writing, the President & CEO or designee shall reduce the request to writing and confirm the request with the requestor. The request must reasonably describe an identifiable public record(s) and must be specific and focused.

To the extent reasonable under the circumstances, CCS will assist the requestor to make a focused and effective request by:

- Assisting the requestor in identifying records and information that are responsive to the request or to the purpose of the request, if stated.
- Describing the information technology and physical location in which the records exist.
- Providing suggestions for overcoming any practical basis for denying access to the records or information sought.

If CCS is unable to identify the requested information after making a reasonable effort to elicit additional clarifying information from the requestor that will help identify the record(s), CCS will not provide further assistance to the requestor.

Response to Public Records Request

The President & CEO will, within 10 days of receipt of the request, provide a written response to the requestor of public records. The written response shall contain the following information:

- Notice informing the requestor whether the request, in whole or in part, seeks copies of disclosable public records in the possession of CCS and the reasons for the determination.
- If the School denies any request for records, in whole or in part, and the request was in writing, the notification of denial will set forth the names and titles or positions of each person responsible for the denial.

- The estimated date and time when the records will be made available.
- CCS may charge for copies of public records or other materials requested by individuals or groups. The charge, based on the direct cost of duplication, shall be determined by the Board of Directors or its designee. The direct cost of duplication includes the pro rata expense of the copying equipment used and the pro rata expense in terms of staff time required to produce the copy. It does not include the cost of locating, retrieving, or inspecting records.
- If the requestor seeks copies in electronic format, CCS may charge the requestor the direct cost of producing a copy of the record in that format. If, in order to comply with these requirements relating to electronic formatted records described below, CCS is required to produce a copy of an electronic record and the record is one that is produced only at otherwise regularly scheduled intervals or the request would require data compilation, extraction or programming to produce the record, CCS may charge the requestor the cost to construct a record, the cost of programming and computer services necessary to produce the record.
- In unusual circumstances, the President & CEO may extend the 10-day limit for up to 14 days by providing written notice to the requestor and setting forth the reasons for the extension and the date on which a determination is expected to be made. Unusual circumstances include, but only to the extent reasonably necessary to properly process the request, the following:
 - 1) The need to search for and collect the requested records from field facilities or other locations that are separate from the office processing the request;
 - 2) The need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request;
 - 3) The need for consultation, which shall be conducted with all practicable speed, with another agency having a substantial interest in the determination of the request, or among two or more components of CCS having substantial subject matter interest therein;
 - 4) The need to compile data, to write programming language or a computer program, or to construct a computer report to extract data.

If an inspection is requested, any person shall have reasonable access, during normal business hours, to the public records of CCS within the requirements of state law. However, if records are not readily available, or if portions of the records to be inspected must be redacted to protect exempt material, then CCS must be given a reasonable period of time to perform these functions prior to inspection. Such records shall be examined in the presence of the staff member regularly responsible for their maintenance.

Records Inspections or Copies

Time and Place of Inspection: A person who has made a public records request may inspect the records after the date and time identified in the response to the request. Generally, records

inspections may take place at **850 Hampshire Road Suite P, Thousand Oaks, CA 91361** during office hours of the School, which are **8:00A.M. to 5:00 P.M.**

Electronic Formatted Records: If CCS has information that constitutes an identifiable public record not exempt from disclosure that is in an electronic format, and it has been requested in an electronic format, CCS will make that information available in an electronic format. CCS will make the information available for inspection in any electronic format in which it holds the information. If the requested format is one that CCS uses to create copies for its own use or for provision to other agencies, CCS will provide a copy of the electronic record. CCS will not, however, provide electronic records in the electronic form in which it is held by CCS if its release jeopardizes or compromises the security or integrity of the original record or of any proprietary software in which it is maintained.

If CCS no longer has the record in electronic format, CCS will not reconstruct the record in electronic format.

Partial Disclosure: If the requested records are only partially disclosable as a portion of the record is exempt from disclosure, the reasonably segregable disclosable portion of the record(s) will be made available for inspection

SECTION 4 - FISCAL – CONTROLS

The Board of Compass Charter Schools (“CCS” or the “Charter School”) has reviewed and adopted the following policies and procedures to ensure the most effective use of the funds of CCS to support the mission and to ensure that the funds are budgeted, accounted for, expended, and maintained appropriately. CCS will develop and monitor its budget in accord with the annual budget development and monitoring calendar as specified below:

January – February

- The Board will work with the President & CEO, with the assistance of the Charter School’s back office services provider, to review the Governor’s proposed state budget for the upcoming fiscal year, and identify the likely range of revenues for the school’s upcoming fiscal year (July 1-June 30).
- The President & CEO, with the assistance of the Charter School’s back office services provider, reviews/prepares a set of proposed budget development principles for board review and approval.
- Develop rough planning budget for upcoming fiscal year, including projected enrollment and any proposed staffing changes.
- Develop five-year budget projection in accord with the schools’ established strategic and growth plans.
- Ongoing monitoring and revision of current year budget.

March – April

- The President & CEO, working in conjunction with the Charter School’s back office services provider, staff, Board members, and the Director of Operations, prepares a formal budget plan for the upcoming fiscal year. The plan is reviewed by the Board.
- Ongoing monitoring and revision of current year budget.

May – June

- President & CEO, with the assistance of the Charter School’s back office services provider, reviews revenue projections subsequent to the Governor’s annual “May Revise” budget figures, fine-tunes the upcoming fiscal year budget to accommodate any changes. This budget will include monthly cash flow projections.
- The Board reviews and formally adopts a budget for upcoming fiscal year before June 30. A copy of the final budget is provided to the charter-granting agency.
- Ongoing monitoring and revision of current year budget.

July – August

- Books for prior fiscal year are closed, all transactions are posted, and records are assembled for audit.
- Budget is reviewed subsequent to the adoption of the state Budget Act and necessary adjustments are made. A copy of the revised final budget is provided to the charter granting agency.
- Independent auditor performs audit of the just-closed fiscal year and prepares audit report for submission to the Board.

September – December

- At the end of the first full week of school, the President & CEO, with the assistance of the Charter School’s back office services provider, reviews CCS’s actual attendance figures and notifies the Board if actual attendance is below budget projections. If needed, the school’s budget is again revised to match likely revenues.

- The Board reviews a copy of the audit. The President & CEO and Finance Committee, with the assistance of the Charter School's back office services provider, address any audit exceptions or adverse findings. Audit report and any follow-up plans are submitted to the charter authorizer and other entities, as required by law.
- The President & CEO, with the assistance of the Charter School's back office services provider, reviews current year actual versus budgeted revenues and expenditures after the second and fifth months of the school year and reports to the Finance Committee. The Board approves any needed changes to the annual budget.

Controls, Budget, and Fiscal Management: CCS will maintain in effect the following principles in its ongoing fiscal management practices to ensure that, (1) expenditures are authorized by and in accord with amounts specified in the board-adopted budget, (2) the schools' funds are managed and held in a manner that provides a high degree of protection of the schools' assets, and (3) all transactions are recorded and documented in an appropriate manner.

Segregation of Duties: CCS will develop and maintain simple check request and purchase order forms to document the authorization of all non-payroll expenditures. All proposed expenditures must be approved by the President & CEO, or his/her designee, who will review the proposed expenditure to determine whether it is consistent with the Board-adopted budget and sign the payment request form. All transactions will be posted in a general ledger. The transactions will be posted on the ledger by the Director of Operations or his/her assistant at the School site or as outsourced to a Board-approved back office provider or its outside accounting firm. To ensure segregation of recording and authorization, the Administrative Assistant in finance may not co-sign check requests for purchase orders or checks for payment.

Banking Arrangements: CCS will maintain its accounts either in the County Treasury or at a federally insured commercial bank or credit union. Funds will be deposited in non-speculative accounts including federally-insured savings or checking accounts or invested in non-speculative federally-backed instruments or in the County's Pooled Money Investment Fund. If funds are held in accounts outside of the County Treasury, the Board must appoint and approve all individuals authorized to sign checks or warrants in accord with these policies. All checks must have the additional signature of the President & CEO. An approved vendor will reconcile the school's ledger(s) with its bank accounts or accounts in the county treasury on a monthly basis and prepare (1) a balance sheet, (2) a comparison of budgeted to actual revenues and expenditures to date, and (3) a cash flow statement. The President & CEO and the Board will regularly review these statements. The School will deposit all funds received as soon as practical upon receipt. All funds received shall be deposited or transferred into the school's accounts at the earliest possible convenience and in no event later than 48 hours after receipt.

Purchasing Procedures: All purchases over \$50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services. The President & CEO or his/her designee shall not approve purchase orders or check requests lacking such documentation. Documentation shall be attached to all check and purchase order requests showing that at least three (3) vendors were contacted and such documentation shall be maintained for three (3) years.

- The President & CEO may authorize expenditures and may sign related contracts within the approved budget. The Governing Board must review all expenditures. This will be done via approval of a check register which lists all checks written during a set period of time and includes check #, payee, date, and amount. The Governing Board must also approve contracts over \$100,000.

- The Director of Operations must approve all purchases. Purchase requisitions, authorizing the purchase of items greater than \$5,000, must be signed by the President & CEO and submitted with the related invoice.
- When approving purchases, the Director of Operations must:
 - Determine if the expenditure is budgeted
 - Determine if funds are currently available for expenditures (i.e. cash flow)
 - Determine if the expenditure is allowable under the appropriate revenue source
 - Determine if the expenditure is appropriate and consistent with the vision, approved charter, school policies and procedures, and any related laws or applicable regulations
 - Determine if the price is competitive and prudent. All purchases over \$50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services
- Any individual making an authorized purchase on behalf of the Charter School must provide appropriate documentation of the purchase.
- Individuals other than those specified above are not authorized to make purchases without pre-approval.
- Individuals who use personal funds to make unauthorized purchases will not be reimbursed. Authorized purchases will be promptly reimbursed by a payroll reimbursement upon receipt of a reimbursement form and original receipt documenting the purchase.
- The President & CEO may authorize an individual to use a school credit card to make an authorized purchase on behalf of the Charter School, consistent with guidelines and limitations provided by the President & CEO and/or Board.
 - Individuals who receive a school credit card must ensure the card is kept in a safe location.
 - If receipts are not available or are “missing”, the individual making the charge will be held personally responsible for payment.
 - Credit cards will bear the names of both CHARTER SCHOOL and the individual user.
 - Debit cards are not allowed.
 - All purchases must also comply with the Procurement and Contract Bidding Policy.

Petty Cash

- The Director of Operations will manage the petty cash fund.
- The petty cash fund will be capped at \$1,000.
- All petty cash will be kept in a locked petty cash box in a locked drawer or file cabinet. Only the Director of Operations and President & CEO will have keys to the petty cash box and drawer or file cabinet.
- All disbursements will require a completed and signed petty cash slip. A register receipt for all purchases must be attached to the petty cash slip.
- Director of Operations will insure that the petty cash slip is properly completed and that a proper receipt is attached.

- At all times the petty cash box will contain receipts and cash totaling \$1,000. A register receipt must support the petty cash slip. The individual using the petty cash to make a purchase is responsible for submitting the receipt for the petty cash slip to the Director of Operations within 24 hours of withdrawing the petty cash.
- When expenditures total \$200, the Director of Operations will total the disbursements, complete a petty cash reimbursement form, and obtain the approval of the President & CEO. This should be done on at least a quarterly basis. The petty cash slips and supporting receipts will be attached to the reimbursement request form and forwarded to back office provider.
- Petty cash fund reimbursement checks will be made payable to the Director of Operations. The reimbursement check will be immediately cashed and the money returned to the petty cash fund.
- Any irregularities in the petty cash fund will be immediately reported in writing to the President & CEO.
- Loans will not be made from the petty cash fund.
- The President & CEO will conduct unscheduled counts of the petty cash fund.

Record Keeping: Transaction ledgers, canceled/duplicate checks, attendance and entitlement records, payroll records, and any other necessary fiscal documents will be maintained by Charter School staff in a secure cloud-based server for at least three years, or as long as required by applicable law, whichever is longer.

Appropriate back-up copies of electronic and paper documentation, including financial and attendance accounting data, will be regularly prepared and stored in a secure cloud-based server separate from the Charter School Property Inventory.

The President & CEO, or his/her designee, shall establish and maintain an inventory of all non-consumable goods and equipment worth over \$2,500. This inventory shall include the original purchase price and date, a brief description, serial numbers, and other information appropriate for documenting the school's assets. This property will be inventoried on an annual basis and lists of any missing property shall be presented to the Board. All non-consumable school property lent to scholars shall be returned to the school no later than five (5) working days after end of the school year. Any excess or surplus property owned by the school may be sold or auctioned by the President & CEO, or his/her designee, provided he/she engages in due diligence to maximize the value of the sale or auction to the school. The sale or auction of property owned by the school with a fair market value in excess of \$25,000 shall be approved in advance by the Board.

Payroll Services: CCS will contract with a reputable, bonded, and insured payroll contractor to prepare payroll checks, tax and retirement withholdings, tax statements, and to perform other payroll support functions. The President & CEO, or his/her designee, will establish and oversee a system to prepare time and attendance reports and submit payroll check requests.

The President & CEO and Board will review payroll statements annually to ensure that (1) the salaries are consistent with staff contracts and personnel policies and (2) the proper tax, retirement, disability, and other withholdings have been deducted and forwarded to the appropriate authority. All staff expense reimbursements will be on payroll checks. Upon hiring of staff, a personnel file will be established with all appropriate payroll-related documentation including a federal I-9 form, tax withholding forms, retirement date, and an accounting of the use of sick leave.

Negotiating Funding Entitlements: The President & CEO shall prepare a set of negotiating principles for Board approval prior to engaging in negotiations over funding entitlements with the charter granting agency and state. President & CEO will take lead responsibility for negotiating

all revenue arrangements with the charter granting agency and appropriate state education agency staff. These arrangements will be documented in appropriate and detailed Memoranda of Understanding for approval by the Board.

Required Budget and Other Fiscal Reports: The President & CEO, working in conjunction with the Director of Operations, will produce and submit to authorizers any and all required fiscal reports as may be required by state or federal law, or mandated by the terms of the school's charter. These include, but are not limited to, attendance reports, enrollment and other data reports required by the California Basic Educational Data System, and other related data.

Fundraising, Grant Solicitation, and Donation Recognition: All fundraising or grant solicitation activities on behalf of the Charter School must be approved in advance by the Board. The Board shall be informed of any conditions, restrictions, or compliance requirements associated with the receipt of such funds, including grants or categorical programs sponsored by the state or federal government. The Board shall be notified no later than the next regular board meeting of the award or receipt of any funds and shall approve the receipt of any grants, donations, or receipts of fundraising proceeds prior to their deposit in the school's accounts.

Annual Financial Audit

- The Board will annually appoint a finance committee by January 1 to select an auditor by March 1 prior to year-end (June 30th).
- Any persons with expenditure authorization or recording responsibilities within the Charter School may not serve on the committee.
- The committee will annually contract for the services of an independent certified public accountant to perform an annual fiscal audit.
- The audit shall include, but not be limited to:
 - An audit of the accuracy of the financial statements
 - An audit of the attendance accounting and revenue accuracy practices

Contracts:

- Consideration will be made of in-house capabilities to accomplish services before contracting for them.
- Office staff will keep and maintain a contract file evidencing the competitive bids obtained (if any) and the justification of need for any contracts over \$50,000.
 - Competitive bids will be obtained where required by law or otherwise deemed appropriate and in the best interests of the Charter School.
- Written contracts clearly defining work to be performed will be maintained for all contract service providers (e.g. consultants, independent contractors, subcontractors).
- Contract service providers must show proof of being licensed and bonded, if applicable, and of having adequate liability insurance and worker's compensation insurance currently in effect. The President & CEO may also require that contract service providers list the Charter School as an additional insured.
- If the contract service provider is a sole proprietor or a partnership (including LP, and LLP), the Director of Operations will obtain a W-9 from the contract service provider prior to submitting any requests for payments.
- The President & CEO will approve proposed contracts and modifications in writing.

- Contract service providers will be paid in accordance with approved contracts as work is performed.
- The President & CEO and/or his designee will be responsible for ensuring the terms of the contracts are fulfilled.
- .If a conflict of interest exists, the Board shall comply with Government Code Section 1090 et seq.
- All contracts must also comply with the Procurement and Contract Bidding Policy.

Accounts Payable

- All original invoices will immediately be forwarded to the Director of Operations for approval.
- The Finance Department will carefully review each invoice, attach all supporting documentation, and verify that the specified services and/or goods were received. When receiving tangible goods from a vendor, the person designated to receive deliveries should trace the merchandise to the packing list and note any items that were not in the shipment.
- Once approved by the Director of Operations, he/she will stamp an approval on the invoice and complete the required information, including noting the specific budget line item that is to be charged for the specified expenditures. The invoice and supporting documentation will be sent to the back office provider on at least a weekly basis. The back office provider will then process the invoices with sufficient supporting documentation.
- The Director of Operations may authorize the back office provider to pay recurring expenses (e.g. rent) with the President & CEO's formal approval (signature) on the invoice when dollar amounts fall within a predetermined range. A list of the vendors and the dollar range for each vendor must be provided to the back office provider in writing and updated on an annual basis.

Bank Checks

- The Board will approve, in advance, the list of authorized signers on the school account. The President & CEO, the Director of Operations, and any other employee authorized by the Board may sign bank checks within established limitations.
- The President & CEO, with advance Board approval, is authorized to open and close bank accounts.
- The Director of Operations, the President & CEO and the back office provider will be responsible for all blank checks and will keep them under lock and key.
- When there is a need to generate a bank check, the Director of Operations will send appropriate approved documentation to the back office provider.
- Once approved by the President & CEO and the Director of Operations, the back office provider issues the check based on the check authorization prior to obtaining the appropriate signature(s).
- The President & CEO and the Director of Operations will co-sign all checks.

SECTION 5 - FISCAL – PROCUREMENT AND CONTRACT BIDDING

I. General

The Board of Directors (“Board”) for Compass Charter Schools (“Charter School”) declares its intent for the Charter School to procure goods and services as well as bidding for construction projects such as new building and facility construction, reconstruction, rehabilitation, alterations and additions in a manner consistent with the guidelines set forth herein. The Charter School’s practices have been designed to give fair and equitable treatment to all persons who deal with the Charter School’s procurement system, to provide maximum economy in procurement activities, and to foster competition within the free enterprise system.

The policies and procedures presented herein are consistent with current applicable state and federal law. As, necessary, the Charter School’s Board of Directors will revise this document as the relevant laws may change from time to time.

II. Procurement Defined

Procurement for the purposes of this policy is defined as buying, purchasing, renting, leasing, or otherwise acquiring goods, services, or construction for the Charter School. It also includes all functions that pertain to the obtaining of any good, service, or construction for the Charter School, including complying with bidding procedures as described herein, as well as administering agreements for goods, services, or construction once established.

Procurement does not include expenditures that typically would not be reviewed by any system of hierarchy for approval, such as using a petty cash fund to purchase lunch for a group of teachers at a professional development seminar.

III. Procurement Policy

Any procurement of goods, services, or construction shall be made upon considering the totality of the circumstances surrounding the procurement, which may include but not be limited to price, quality, availability, timelines, reputation, and prior dealings.

No work, project, service, or purchase shall be split or separated into smaller work orders or projects for the purpose of evading the requirements of this policy.

IV. Professional Services Contracts

The Charter School may hire such professional services as are needed for the operation of the Charter School without complying with the bidding procedures described in Sections VII and VIII herein. Such professional services include, but are not limited to, the following professionals: attorneys, architects, accountants, engineers, accountants, construction management, administrative services, and financial advisors.

In selecting professionals for engagement, the Charter School may consider all relevant factors, including but not limited to experience, education, expertise, reputation, and cost. The selection of professionals providing these services shall be within the sole discretion of the Board.

V. Construction Contracts

Procurement of construction and/or construction related services (other than those services which constitute professional services as described above in Section IV) must be made in accordance with the bidding procedures described herein. Additionally, the Charter School must comply with the prevailing wage laws applicable to certain construction and/or services that constitute a “public works” project as defined under the Labor Code. (Labor Code §§ 1720, 1720.2, and 1720.3.)

A “public works” project is defined as “construction, alteration, demolition, installation, or repair work done under contract and paid for in whole or in part out of public funds...” (Labor Code § 1720(a)(1).)

An outline of the additional requirements applicable to public works projects are further described in Section X.

VI. Guidelines for Selecting Contractors/Vendors

A. Prequalification Procedures

The Charter School may, but is not required to, establish prequalification procedures for any contract for which bids are required.

B. Suspended and Debarred Contractors/Subcontractors

The Charter School may not consider any contractor or subcontractor that is debarred, suspended or is otherwise excluded from bidding on, accepting, or performing any public works contracts, by the Division of Labor Standards Enforcement (“DLSE”) of the California Department of Industrial Relations (“DIR”).

The Charter School is required to vet any potential contractor or subcontractor for suspension or debarment before a contract may be awarded. A list of suspended and debarred contractors and subcontractors may be accessed through the DLSE Debarments Web Site at <http://www.dir.ca.gov/dlse/debar.html>.

VII. Informal Bidding and Contract Approval – Contracts up to \$50,000

All purchases over \$50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services of similar value. The President & CEO or designee shall not approve invoices, purchase orders, or check requests lacking such documentation. Documentation shall be attached to all invoices, purchase orders, and check requests indicating that at least three (3) contractors/vendors were contacted, and such documentation shall be maintained for three (3) years. Informal quotes or proposals for goods and/or services may be requested and received in writing by mail, email, facsimile, and/or verbally, such as by telephone, as long as properly documented.

Contracts for purchases of up to \$100,000 within the approved budget may be executed by the President & CEO without prior Board approval. The Governing Board must review all expenditures. This will be done via approval of a check register which lists all checks written during a set period of time and includes check #, payee, date, and amount. The Governing Board must also approve contracts over \$100,000. The Director of Operations must approve all purchases.

VIII. Formal Bidding and Contract Approval – Contracts Over \$50,000

Contracts for the purchase of more than \$50,000 worth of equipment, materials or supplies to be furnished, sold, or leased to the Charter School, or contracts for more than \$50,000 worth of services or construction (excluding those professional services agreements enumerated in Section IV), shall be subject to the formal bidding requirements set forth herein.

If formal bidding is required, the Charter School shall utilize the following procedures:

A. Seeking Bids

The Charter School shall seek bids from those sources able to offer the best prices, consistent with quality, quantity, delivery, and service. To ensure that good value is received for funds expended, the request for bids shall be carefully designed to clearly and completely describe in detail the quality, delivery, and service required, and shall include the criteria that will be used to evaluate the offers and the relative weights given to the criteria. Further, the request for bids shall specify the date in which all bids must be received by the Charter School.

Notice of the request for bids may be provided in one or more of the following ways:

- (1) Publishing the request for bids in at least one newspaper of general circulation within the boundaries of each authorizer's County, once a week for at least [two (2) weeks] before the deadline for receiving bids;
- (2) Posting the request for bids on the Charter School's website or other electronic portal for at least [two (2) weeks] before the deadline for receiving bids; and/or
- (3) Directly submitting notice of the request for bids to an adequate number of qualified sources to permit reasonable competition consistent with the nature and purpose of this policy. Any list of potential contractors/vendors that is generated must be current and include enough qualified sources to ensure reasonable open and free competition.

B. Opening Bids

Bids may be opened only at the time and place prescribed by the President & CEO or designee. A bid that has been opened may not be changed for the purpose of correcting an error in the bid price. However, bidders retain the right to withdraw a bid due to a material mistake in the bid. After bids have been opened, they shall be available for inspection or copy by any interested party. The Charter School must maintain the bid document(s) for the duration of the contract and for three (3) years beyond the completion of the contract.

C. Contract Award

The Board, or any employee of the Charter School to whom responsibility has been delegated, shall award a competitively bid contract at the bid amount to the bidder offering the best value to the Charter School according to its selection criteria. The contract need not be awarded to the lowest responsible bidder. The selection criteria may include the following factors:

- (1) Purchase price;
- (2) Reputation of the contractor/vendor and of the contractor's/vendor's goods and/or services;

- (3) Quality of the contractor's/vendor's goods and/or services;
- (4) Extent to which the goods and/or services meet the Charter School's needs;
- (5) Contractor's/vendor's record of past performance;
- (6) Contractor's/vendor's financial standing and capacity;
- (7) Contractor's/vendor's past relationship with the Charter School; and
- (8) Total long-term cost to the Charter School to acquire the goods and/or services.

Contracts over \$100,000 must be approved by the Board prior to execution by the President & CEO.

Any and all bids may be rejected if there is a sound, documented reason for doing so.

D. Protest by Bidders

A bidder may protest a bid award if he/she believes that the award was inconsistent with this policy, the bid's specifications, or was not in compliance with law.

A protest must be filed in writing with the President & CEO or designee within five (5) business days after receipt of notification of the contract award. The bidder shall submit all documents supporting or justifying the protest. A bidder's failure to file the protest documents in a timely manner shall constitute a waiver of his/her right to protest the award of the contract.

The President & CEO or designee shall review the documents submitted with the bidder's claims and render a decision in writing within thirty (30) business days. The President & CEO or designee may also convene a meeting with the bidder to attempt to resolve the problem.

The bidder may appeal the President & CEO or designee's decision to the Board. The President & CEO or designee shall provide reasonable notice to the bidder of the time for Board consideration of the contract award. The Board's decision shall be final.

IX. Noncompetitive Proposals

A noncompetitive procurement proposal is the solicitation of a proposal from only one (1) source. Noncompetitive procurement proposals may only be used after the Charter School has solicited bids and/or proposals from at least three (3) sources, and has determined and documented that competition was inadequate. The Board, in its sole discretion, shall select the single source offering the best value to the Charter School according to its selection criteria list above. If a good, service, or construction is available only from a single source, this may also be documented to justify a noncompetitive proposal.

X. Public Works Projects and Prevailing Wage Requirements

A. Mandatory Public Works Project Request for Bids Terms and Specifications

All requests for bids (or the "call for bids") and bid specifications for construction and/or services, which constitute a "public works" project ("Project"), issued and published by the Charter School, must contain the following terms and specifications when applicable:

- (1) **General Project Description as Public Work:** In the call for bids, the Charter School must provide a general description of the work required for the Project and state that “the Project is classified as a ‘public work,’ as defined in Labor Code Section 1720, to which not less than the general prevailing rate of per diem wages for work of a similar character and the rates for overtime and holiday work in the locality in which the work is to be performed for each craft, classification or type of worker needed to execute the contract shall be paid to all workers employed on the Project in accordance with Labor Code Section 1771.”
 - (2) **Bid Closing Date:** The Charter School must also specify in the call for bids the place the contractor’s bids are to be received, and the time by which they shall be received.
 - (3) **Prevailing Wage Rate:** The Charter School is required to specify in the call for bids and in the bid specifications the general rate of per diem wages as described in Section (A)(1) above. (Labor Code § 1773.2.) The general prevailing wage rate must be obtained from the Director of the DIR. The applicable general prevailing wage rates for any such public works project are available on the DIR website at <http://www.dir.ca.gov/OPRL/dprevagedetermination.htm>.
- In lieu of specifying the rate of wages, the Charter School may include a statement in the call for bids and in the bid specifications that “copies of the prevailing rate of per diem wages are on file at its principal office and shall be made available to any interested part on request.” (Labor Code § 1773.2.)
- (4) **Notice of DIR Enforcement:** The Charter School shall specify in the call for bids that the Project is “subject to compliance monitoring and enforcement by the Department of Industrial Relations.” (Labor Code § 1771.4(a)(1).)
 - (5) **Registered Contractor Notice:** The Charter School shall provide notice in the call for bids that “a contractor or subcontractor shall not be qualified to bid on, be listed in a bid proposal, or engage in the performance of any contract for public work, unless currently registered and qualified to perform public work pursuant to Section 1725.5.” The Charter School shall not accept a bid or enter into a contract or subcontract without proof of the contractor or subcontractor’s current registration to perform public work pursuant to Section 1725.5. (Labor Code § 1771.1.)
 - (6) **Contractor/Vendor Bids:** The Charter School shall require all contractor/vendor bids to expressly state that the contractor/vendor “will pay its workers the applicable prevailing wage rate in accordance with Labor Code Sections 1771 and 1774.”

B. **Mandatory Public Works Project Contract Terms**

All contracts for construction and/or services that constitute a “public works” project (“Project”) entered into with the Charter School must contain the following terms and provisions when applicable:

- (1) **General Project Description as Public Work:** The Charter School must provide a general description of the work required for the Project and specify in the Project Contract that “the Project is classified as a ‘public work,’ as defined in Labor Code Section 1720, to which not less than the general prevailing rate of per diem wages for work of a similar character

and the rates for overtime and holiday work in the locality in which the work is to be performed for each craft, classification or type of worker needed to execute the contract shall be paid to all workers employed on the Project in accordance with Labor Code Section 1771.”

- (2) **Prevailing Wage Rate:** The Charter School is required to specify in the Project Contract the general rate of per diem wages as described in Section (B)(1) above. (Labor Code § 1773.2.) The general prevailing wage rate must be obtained from the Director of the DIR. The applicable general prevailing wage rates for any such public works project are available on the DIR Wage Determination website at <http://www.dir.ca.gov/OPRL/dprevagedetermination.htm>. In lieu of specifying the rate of wages, the Charter School may include a statement in the Project Contract that “copies of the prevailing rate of per diem wages are on file at its principal office and shall be made available to any interested party on request.” (Labor Code § 1773.2.)
- (3) **Compensation Provision:** The Charter School shall include a clause in the Project Contract that states, “In accordance with the provisions of Section 3700 of the Labor Code, every contractor will be required to secure the payment of compensation to his employees.” (Labor Code § 1860.)
- (4) **Penalty Stipulation:** The Charter School shall also include a stipulation in the Project Contract that notifies the contractor that the contractor or subcontractor will be subject to a penalty of twenty-five dollars (\$25) for each calendar day a worker employed in the execution of the Contract is required or permitted to work more than 8 hours in any one calendar day and 40 hours in any one calendar week without payment of the applicable overtime rate of pay. (Labor Code § 1813.)
- (5) **Underpayment of Prevailing Wage:** The Project Contract must include a stipulation that states, “The difference between the prevailing wage rates and the amount paid to each worker for each calendar day or portion thereof for which each worker was paid less than the prevailing wage rate shall be paid to each worker by the contractor or subcontractor in accordance with Section 1775 of the Labor Code.” (Labor Code § 1775(a)(2)(E).)
- (6) **Apprenticeship Requirement:** The Charter School must also include a provision in the Project Contract that effectuates Labor Code Section 1777.5, which requires the contractor to employ properly registered apprentices for the Project. Specifically, the contractual provision must fix the responsibility of compliance with the apprenticeship requirements under Section 1777.5 for all apprenticeable occupations with the prime contractor on the Project. (Labor Code § 1777.5(n).)
- (7) **8-Hour Work Day:** The Project Contract shall also include a clause establishing that “Eight hours labor constitutes a legal day’s work.” (Labor Code § 1810.)
- (8) **Payroll Record Contract Provisions:** The Charter School shall include a stipulation in the Project Contract effectuating Labor Code Section 1776, which requires the contractor to maintain accurate certified payroll records that include the name, address, social security number, work classification, straight time and overtime hours worked each day and week, and the actual per diem wages paid to each apprentice, worker, or other employee of the contractor in connection with the public work, and a written declaration of the employee verifying the truth of the payroll record. (Labor Code § 1776.)

The Charter School must designate the times the contractor and subcontractor are required to furnish the payroll records to the Compliance Monitoring Unit (“CMU”) of the DIR. (8 CCR § 16461(b).) The Project Contract shall specify that “the contractor and each subcontractor shall furnish the payroll record of wages paid as specified in Section 1776 directly to the Compliance Monitoring Unit (“CMU”) of the DIR on a monthly basis until the completion of the Project, or within 10 days of any separate request by the CMU.” (8 CCR § 16461(b).)

Further, the Project Contract must include a provision stating, “Contract payments shall not be made when payroll records are delinquent or inadequate.” (8 CCR § 16421(a)(6).)

XI. Mandatory Contract Terms

All contracts entered into with the Charter School must contain the following terms when applicable:

- (1) A ceiling price that the contractor/vendor exceeds at its own risk.
- (2) Retention of all required records by the contractor/vendor for three (3) years after the Charter School makes final payments and all other pending matters are closed.
- (3) Access by the Charter School or any of their duly authorized representatives to any books, documents, papers, and records of the contractor which are directly pertinent to that specific contract for the purpose of making audit, examination, excerpts, and transcriptions.
- (4) Administrative, contractual, or legal remedies in instances where contractors/vendors violate or breach contract terms, and the sanctions and penalties that are appropriate.
- (5) Termination for cause and for convenience by the Charter School, including the manner by which it will be effected and the basis for settlement.

XII. Maintenance of Records

The Charter School shall document specific actions for any procurement. These specific actions include, but are not limited to:

- (1) The rationale for the method of procurement.
- (2) The selection of contract type.
- (3) The selection or rejection of a contractor/vendor, and supporting rationale.
- (4) The basis for a contract price.

Documentation of each of these actions shall be prepared as the actions occur within any given instance of procurement.

Procurement records, accepted bid documents, and selected contracts will be retained by the Charter School for not less than three (3) years.

XIII. Conflict of Interest

If a conflict of interest exists, the Board shall comply with Government Code Section 1090 et seq.

No Board member or Charter School employee shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

To the extent permitted by law, any Board member or Charter School employee who violates this section may be subject to penalties, sanctions, and other disciplinary actions.

XIV. Reservation

The Charter School Procurement and Contract Bidding Policy shall be amended and updated if necessary to comply with changes in acceptable procurement practices.

XV. Federal Grants or Programs

In addition to complying with all conditions herein, all contracts involving federal grants or other federal programs shall also fully comply with all applicable federal procurement guidelines related to such programs. In the event there is a conflict between this policy and the applicable federal procurement guidelines, the federal guidelines shall prevail.

SECTION 6 - FISCAL – GIFT ACCEPTANCE

The purpose of the Donation Acceptance Policy is to delineate policies and guidelines governing the acceptance of donations by Compass Charter Schools, and to provide guidance to prospective donors relating to potential donations to the organization.

Although we appreciate any donor who is interested in donating to our organization, Compass Charter Schools will not engage in any of the following donation acceptance practices:

- Accepting any donation that violates federal or municipal laws;
- Accepting donations that require Compass Charter Schools to provide special consideration or treatment to any individual, donor, entity, etc.;
- Accepting donations that require the Compass Charter Schools to deviate from its normal hiring, promotion or contracting procedures;
- Accepting personal gifts in any cash amount, including gift certificates, coupons, entertainment tickets or the like; and
- Accepting donations from organizations whose mission or core activities may be in direct conflict with the mission of Compass Charter Schools or which may limit its ability to perform its functions as a California nonprofit public benefit corporation creating, managing, operating, guiding, directing and promoting one or more California public charter schools.

When appropriate, the President & CEO will consult with the Board of Directors regarding all donations prior to acceptance. With that said, Compass Charter Schools respectfully reserves the right to refuse any donation it believes is not in the best interest of the organization. Additionally, Compass Charter Schools employees may not accept any donations on behalf of Compass Charter Schools without the prior consent of the President & CEO.

All donations must be accepted by the Board of Directors at a regularly scheduled Board meeting.

SECTION 7 – CURRICULUM - CURRICULUM ASSESSMENT

The Board recognizes that it is accountable to the scholars, parents/guardians and community for conducting ongoing evaluation of the curriculum and educational program of Compass Charter Schools. Appropriate means for continuing evaluation of the entire educational program shall be established.

The President & CEO, or his/her designee, shall review the effectiveness of the curriculum in meeting Compass Charter Schools' educational program needs and goals at least annually. The President & CEO shall provide a report on scholar progress in reaching Compass Charter Schools' educational goals and professional development of staff to the Academic Affairs Committee every two months, beginning in January of each year. The Academic Affairs Committee will present and summarize the report to the Board at the Board meeting immediately following receipt of the report. Based on these reports, the Board shall take appropriate actions to maintain the effectiveness of programs and to improve the quality of education delivered by Compass Charter Schools.

Elements of the President & CEO's reports may include the following:

1. Test results, surveys, inventories, checklists, and other indicators of scholar behavior;
2. Information regarding pupil behavior as assessed by teachers, peers, or the scholar himself/herself;
3. Descriptions of experiences implemented for scholars that are designed to bring about the desired outcomes;
4. Test results, measurements and observations related to the learning experience described in number 3, above;
5. Comparisons of outcomes with objectives;
6. Comparison of Compass Charter Schools curriculum with the applicable state standards;
7. Results from all state mandated assessments and any internal assessments;
8. Scholar writing samples and end-of-course grades.

Each year, in addition to the regular reports described above, the President & CEO, or his/her designee, shall provide the Board with a year-end report so the Board can determine the extent to which Compass Charter Schools has accomplished or made significant progress toward achieving its professional development and educational goals.

SECTION 8 – CURRICULUM - INDEPENDENT STUDY BOARD POLICIES

Compass Charter School (“CCS”) offers independent study to meet the educational needs of pupils enrolled in the charter school. Independent study is an alternative education model designed to teach the knowledge and skills of the core curriculum. CCS shall provide appropriate existing services and resources to enable pupils to complete their independent study successfully. The following written policies have been adopted by the Board of Directors for implementation at CCS:

1. For pupils in all grade levels and programs offered by CCS, the maximum length of time that may elapse between the time an assignment is made and the date by which the pupil must complete the assigned work shall be _____ school days.
2. When any pupil fails to complete _____ assignments during any period of _____ school days, the President & CEO or his or her designee shall conduct an evaluation to determine whether it is in the best interests of the pupil to remain in independent study. A written record of the findings of any evaluation conducted pursuant to this policy shall be treated as a mandatory interim pupil record. This record shall be maintained for a period of three years from the date of the evaluation and if the pupil transfers to another California public school, the record shall be forwarded to that school.
3. A current written agreement shall be maintained on file for each independent study pupil, including but not limited to, all of the following:
 - The manner, time, frequency, and place for submitting a pupil's assignments and for reporting his or her progress.
 - The objectives and methods of study for the pupil's work, and the methods utilized to evaluate that work.
 - The specific resources, including materials and personnel, that will be made available to the pupil.
 - A statement of the policies adopted herein regarding the maximum length of time allowed between the assignment and the completion of a pupil's assigned work, and the number of missed assignments allowed prior to an evaluation of whether or not the pupil should be allowed to continue in independent study.
 - The duration of the independent study agreement, including beginning and ending dates for the pupil's participation in independent study under the agreement. No independent study agreement shall be valid for any period longer than one school year.
 - A statement of the number of course credits or, for the elementary grades, other measures of academic accomplishment appropriate to the agreement, to be earned by the pupil upon completion.

- The inclusion of a statement in each independent study agreement that independent study is an optional educational alternative in which no pupil may be required to participate. In the case of a pupil who is referred or assigned to any school, class or program pursuant to Education Code Section 48915 or 48917, the agreement also shall include the statement that instruction may be provided to the pupil through independent study only if the pupil is offered the alternative of classroom instruction.
 - Each written agreement shall be signed, prior to the commencement of independent study, by the pupil, the pupil's parent, legal guardian, or care giver, if the pupil is less than 18 years of age, the certificated employee who has been designated as having responsibility for the general supervision of independent study, and all persons who have direct responsibility for providing assistance to the pupil. For purposes of this paragraph "caregiver" means a person who has met the requirements of Part 1.5 (commencing with Section 6550) of the Family Code.
4. CCS shall comply with the Education Code Sections 51745 through 51749.3 and the provisions of the Charter Schools Act and the State Board of Education regulations adopted there under.
 5. The President & CEO shall establish regulations to implement these policies in accordance with the law.

**Compass Charter School
Master Agreement for Independent Study**

Scholar Name:
Scholar Number:
Address:
City/Location:
Phone Number:
DOB:

Agreement Duration:
Beginning Date:
End Date:
Year:
Grade Level:
2nd Phone Number:

Scholars are required to report to their teacher as follows to submitting work and reporting progress:

Manner of Reporting: One-on-one Small Group E-mail Fax.

Time: _____.

Frequency: _____.

Place of Meeting: _____.

Method of Study: Specific methods of study will be designated on the Scholar Assignment Sheet and Attendance Record incorporated herein. Examples of methods of study for the scholar will include but are not limited to: Independent Reading Textbook Activities Problem Solving Study Projects Drill & Practice Experiential Learning Computerized Curriculum Web/Internet Research Library Research Field Trips Learning Center Courses Other _____.

Method of Evaluation: Academic evaluations will be designated on the Scholar Assignment Sheet and Attendance Record incorporated herein. Examples of acceptable methods of evaluation include but are not limited to: Teacher-made Tests Student Conferences Progress/Report Cards Chapter/Unit Tests Work Samples Observations Portfolios State Standards Testing Learning Journals Presentations Quizzes Labs Finals Other _____.

Resources: Compass Charter School will provide appropriate instructional materials and personnel to enable the scholar to complete the assigned work. Resources must include those reasonably necessary for the achievement of the objectives and must include resources that are normally available to all scholars on the same terms as the terms on which they are available to all. Assignments and specific resources will be designated on the Assignment and Attendance Record incorporated herein.

Board Policies:

(a) For scholars in all grade levels offered by CCS, the maximum length of time that may elapse between the time an assignment is made and the date by which the scholar must complete the assigned work shall be **[days]** school days.

(b) A scholar may miss **assignments** assignment during any period of **days** school days before an evaluation is conducted to determine whether it is in the best interests of the pupil to remain in independent study. Therefore, when any scholar fails to complete **assignments** assignments during any period of **days** school days, the President & CEO or his or her designee shall conduct an evaluation to determine whether it is in the best interests of the scholar to remain in independent study. A written record of the findings of any evaluation conducted pursuant to this policy shall be treated as a mandatory interim pupil record. This record shall be maintained for a period of three years from the date of the evaluation and if the pupil transfers to another California public school, the record shall be forwarded to that school.

Objectives: The scholar will complete the courses listed below. All course objectives are consistent with Compass Charter School standards, as outlined in the Compass Charter School’s subject/course descriptions. Assignment Sheet and Attendance Record will include additional descriptions of the major objectives and activities of the courses of study covered by this agreement including the evaluation of student work and is incorporated herein. The term “Course Value” (“CV”) refers to the number of credits (secondary education) or weeks of work (elementary education) the student will attempt.

Course Credits or Other Measures of Academic Achievement to be Earned Upon Completion

Category	Subject	CV	Modified
Language Arts	English 9	5	No
Mathematics	Algebra 1	5	No
Social Studies	World History	5	No

Voluntary Statement: It is understood that independent study is an optional educational alternative in which no pupil may be required to participate. In the case of a pupil who is referred or assigned to any school, class or program pursuant to Education Code Section 48915 or 48917, instruction may be provided to the pupil through independent study only if the pupil is offered the alternative of classroom instruction.

Signatures and Dates:

I have read and I understand the terms of this agreement, and agree to all provisions set forth.

Scholar: _____ Date: _____

Learning Coach: _____ Date: _____

Supervising Teacher: _____ Date: _____

Other Person Who Has Direct Responsibility for Providing Assistance to the Scholar:
_____ Date: _____

Other Person Who Has Direct Responsibility for Providing Assistance to the Scholar:
_____ Date: _____

Other Person Who Has Direct Responsibility for Providing Assistance to the Scholar:
_____ Date: _____

SECTION 9 – CURRICULUM - SCHOOL CALENDAR

When drafting the school calendar, the President & CEO, or his/her designee, shall attempt to maximize the number of school days and promote high attendance levels to maximize funding. The school calendar shall also reflect any commitments made in the charter petitions.

The President & CEO, or his/her designee, shall annually present the proposed school calendar for the following school year to the Board at its first meeting in March.

The school calendar shall comply with all applicable legal requirements, including meeting the minimum number of required school days for charter schools, and shall, to the greatest extent possible, meet the needs of the community, scholars, staff and parents/guardians. The school calendar shall indicate the beginning and end-of-school dates, regular school days, number of instructional days, professional development, legal holidays, vacation periods, and other pertinent dates.

SECTION 10 - FACILITIES/OPERATIONS - FACILITIES DEVELOPMENT

The President & CEO shall present to the Governing Board annually a multi-year Capital Improvement Program which will include recommendations regarding timing, location, costs and savings associated with new building requirement and restoration and renewal of existing school facilities. The President & CEO's report will:

1. Provide five-year enrollment projections prepared under the direction of the President & CEO and which have been reviewed and brought up-to-date annually.
2. Provide an assessment for all school facilities related to building renewal, reconfiguration or expansion to meet educational program needs.
3. Identify interim and long-term options that address the identified needs.
4. Articulate a rationale for recommended solutions.
5. Provide a detailed scope of work (e.g. number of rooms, extent of building system improvements) for each recommended project.
6. Provide a cost estimate for each recommended project that achieves compliance with approved educational specifications. This estimate will include all project costs (e.g. architect/engineering fees, project management, hazardous material abatement, installation of technology infrastructure, contingency, equipment).

SECTION 11 – PERSONNEL

Please refer to the Staff Handbook which are incorporated annually as a part of these Board Policies.

SECTION 12 - SCHOOL SAFETY - INJURY AND ILLNESS PREVENTION PROGRAM
GUIDANCE

**ACKNOWLEDGMENT OF RECEIPT OF SAFETY MANUAL & INJURY
AND ILLNESS PREVENTION PROGRAM**

PLEASE READ THE EMPLOYEE SAFETY MANUAL & INJURY AND ILLNESS PREVENTION PROGRAM AND SUBMIT A SIGNED COPY OF THIS STATEMENT TO THE DIRECTOR OF OPERATIONS.

EMPLOYEE NAME: _____

This is to certify that I have received a copy of the CCS Safety Manual & Illness and Injury Prevention Program. I have read this document, understand it, and will comply with it while working for the School.

I understand that failure to abide by these rules may result in disciplinary action and possible termination of my employment with CCS.

I also understand that I am to report any injury to my Supervisor or Manager immediately and report all safety hazards.

I further understand that I have the following rights.

- I am not required to work in any area I feel is not safe.
- I am entitled to information on any hazardous material or chemical I am exposed to while working.
- I am entitled to see a copy of the CCS Safety Manual & Injury and Illness Prevention Program.
- I will not be discriminated against for reporting safety concerns.

Employee's Signature: _____ Date: _____

Please sign/date, tear out, and return to CCS.

Policy Statement on Safety

The safety and health of each Compass Charter Schools (CCS) employee is of primary importance to us. We are committed to maintaining a safe and healthful working environment, and to achieve this goal, we have developed and implemented this comprehensive Safety Manual and Injury and Illness Prevention Program (“IIPP”). This Manual is designed to prevent workplace accidents, injuries, and illnesses. A complete copy of the program is maintained at our office at 850 Hampshire Road, Suite P, Thousand Oaks, CA 91261. A copy is also maintained online via Facebook Workplace. You may ask to review it at any time. You may also contact our Director of Operations at (818) 769-7241, if you have any questions or concerns.

It is the intent of CCS to comply with all laws relating to occupational safety and health. Management will provide all necessary safeguards, programs, and equipment required to reduce the potential for accidents and injuries. To further increase workplace safety, we require the active participation and assistance of all employees. The policies and procedures contained in this Manual are mandatory. You should also be constantly aware of conditions in all work areas that can produce injuries or illness. No employee is required to work at a job that he or she knows is not safe. Never hesitate to inform your supervisor of any potentially hazardous situation or condition that is beyond your ability or authority to correct immediately. No employee will be discriminated against for reporting safety concerns to management.

It is the responsibility of each employee to support the company safety program and to perform in a manner that assures his or her own personal safety and the safety of others, including customers, visitors and other trades. To be successful in our endeavor, all employees on every level must adopt proper attitudes towards injury and illness prevention. We must also cooperate in all safety and health matters, not only between management and employees, but also between each employee and his or her respective coworkers. Only through such an effort can any safety program be successful. Our objective is a safety and health program that will reduce the total number of injuries and illnesses to an absolute minimum. Our ultimate goal is zero accidents.

J.J. Lewis
President & CEO

Code of Safe Practices

General Safety Rules

1. All persons shall follow this Code of Safe Practices and render every possible aid to safe operations.
2. Failure to abide by the Code of Safe Practices may result in disciplinary action up to and including termination.
3. Employees are to immediately report any unsafe conditions, accidents, injuries or illness to their Supervisor or Manager.
4. If you are unsure of the safe method to do your job, STOP and ask your Supervisor. Ignorance is no excuse for a safety violation.
5. No one shall be knowingly permitted to work while the employee's ability or alertness is impaired by fatigue, illness, and prescription or over the counter drugs. Employees who are suspected of being under the influence of illegal or intoxicating substances, or impaired by fatigue or an illness, shall be prohibited from working.
6. Never work while fatigued, ill, or under the influence of an illegal or intoxicating substance.
7. Anyone known to be under the influence of any drugs or intoxicating substances which impair the employee's ability to safely perform the assigned duties shall not be allowed on the job.
8. Horseplay, scuffling, fighting and other acts that tend to have an adverse influence on workplace safety or employee well-being are prohibited.
9. Work shall be well-planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
10. Keep the work area clean and free of debris, electrical cords and other hazards.
11. Immediately clean up spilled liquids.
12. Always notify all other individuals in your area who might be endangered by the work you are doing.
13. Do not operate equipment that you are not familiar with. Do not attempt to use such equipment until you are fully trained and authorized.
14. You are responsible for ensuring all safety guards are operable and in place. If they are not, STOP working and tell your Supervisor.
15. Never bring firearms, weapons, illegal drugs or alcoholic beverages on school grounds.

16. CCS will appropriately label equipment that is NOT to be operated, energized or used. All such notices and procedures must be observed and obeyed.
17. Do not block exits, fire doors, aisles, fire extinguishers, first aid kits, emergency equipment, electrical panels, or traffic lanes.
18. Do not leave tools, materials, or other objects on the floor that might cause others to trip and fall.
19. Do not run on the work site if it would be unsafe to do so.
20. Do not distract others while working. If conversation is necessary, make sure eye contact is made prior to communicating.
21. Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that it is safe to enter.
22. Employees shall ensure that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies promptly to the Supervisor or Manager.
23. Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.
24. Employees shall cleanse thoroughly after handling hazardous substances, and follow special instructions from authorized sources.
25. Gasoline or other flammable liquids shall not be used for cleaning purposes.
26. No burning, welding, or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the Supervisor or Manager.

Campus Safety

1. Be aware of unknown persons loitering in parking areas, walkways, entrances and exits and service areas.
2. Report any suspicious persons or activities to school administration.
3. Employee desk or office should be secured at the end of the day.
4. When an employee is called away from his or her work area for an extended length of time, valuable or personal articles should not be left around a work station that may be accessible.

5. Employees must immediately notify school administration when keys are missing or if security access codes or passes have been breached.

Fire Prevention and Housekeeping

1. Always take precautions to prevent fires which may be started, particularly from oily waste, rags, gasoline, flammable liquids, acetylene torches, improperly installed electrical equipment and trash.
2. Firefighting equipment is to be inspected on a regular basis. All discharged, damaged or missing equipment is to be immediately reported to a Supervisor. Tampering with fire equipment is prohibited.
3. Access to fire extinguishers must be kept clear at all times. Make note of the location of firefighting equipment in your work area.
4. Never use gasoline or flammable solvents for cleaning purposes.
5. Smoking is prohibited within twenty (20) feet of where flammable substances are present.
6. In case of fire, employees shall consider the safety of themselves and other individuals before saving property.
7. Keep your work areas free of debris. Remove useless material from the work area as fast as required to help reduce tripping hazards.
8. Maintain awareness of potential hazards when walking about the work site.
9. Keep tools, materials and equipment out of walkways and stairways at all times.
10. Sharp wires or protruding nails must be kept bent.

General Duties and Responsibilities for Safety

A safe working environment can only be achieved and maintained when there is active interest, participation, and accountability at all levels of the organization. To ensure this, CCS, delegates the following safety duties by job title. Please keep in mind that this is not an all-inclusive list. In some cases employees will need to perform safety duties outside their regular responsibilities to prevent accidents.

Executive management must plan, organize, and administer the program by establishing policy, setting goals and objectives, assigning responsibility, motivating subordinates, and monitoring results. The Director of Operations will support and maintain an ongoing IIPP through the following:

1. Providing clear understanding and direction to all management and employees regarding the importance of safety through the development, implementation, monitoring and revision of policy and procedures.
2. Providing adequate funds for the purchase of necessary safety materials, safety equipment, proper personal protective equipment, adequate time for employee safety training, and maintenance of tools and equipment.
3. Overseeing development, implementation, and maintenance of the IIPP and other required safety programs.
4. Maintaining a organizational commitment to accident prevention by expecting safe conduct on the part of all managers, supervisors, and employees.
5. Holding all levels of management and employees accountable for accident prevention and safety.
6. Reviewing all accident investigations to determine corrective action.

Managers and Supervisors play a key role in the prevention of accidents on the job. They have direct contact with the employees and know the safety requirements for various jobs. Safety responsibilities for these individuals include:

1. Enforce all safety rules in the Code of Safe Practices and ensure safe work procedures.
2. Verify corrective action has been taken regarding safety hazards and accident investigations.
3. Conduct periodic documented inspections of the work sites to identify and correct unsafe actions and conditions that could cause accidents.
4. Act as a leader in company safety policy and setting a good example by following all safety rules.
5. Become familiar with local, state, and federal safety regulations. The Safety Coordinator is available for assistance.

6. Train all new and existing employees in proper safety procedures and the hazards of the job.
7. Instruct all employees, under their supervision, in safe work practices and job safety requirements.
8. Hold occasional safety meetings with employees.
9. Ensure employee proficiency when assigning work requiring specific knowledge, special operations or equipment.
10. Ascertain that all machinery, equipment, and workstations are maintained in safe working condition and operate properly.
11. Correct unsafe acts and conditions that could cause accidents.
12. Communicate with all employees about safety and accident prevention activities.
13. Correct the cause of any accident as soon as possible.
14. Ascertain that proper first aid and firefighting equipment is maintained and used when conditions warrant its use.
15. Maintain good housekeeping conditions at all times.
16. Investigate all injuries and accidents to determine their cause and potential corrective action.
17. Ascertain that all injuries involving our employees that require medical attention are properly treated and promptly reported to the office.

The Safety Coordinator acts as a safety resource for the company and is responsible for maintaining program records. The Director of Operations is currently responsible for this role. The Safety Coordinator will also be our primary person to deal with outside agencies regarding the safety program and its contents. Additional duties include:

1. Coordinate of all loss prevention activities as a representative of management.
2. Act as a consultant to management in the implementation and administration of the policies set forth in this Manual.
3. Develop and implement loss prevention policies and procedures designed to insure compliance with the applicable rules and regulations of all federal, state, and local agencies.
4. Review all accident reports to determine cause and preventability.
5. Conduct periodic reviews of the program and job sites to evaluate performance, discuss problems and help solve them.

6. Consult with representatives of our insurance companies in order that their loss control services will support the IIPP.
7. Review Workers' Compensation Claims and help supply the insurance carrier with information about injured employees in order to keep loss reserves as low as possible.

Every employee is responsible for working safely, both for self-protection and for protection of fellow workers. Employees must also support all company safety efforts. Specific employee safety responsibilities include:

1. If you are unsure how to do any task safely, ask your supervisor.
2. Read and abide by all requirements of this Manual.
3. Wear all required personal protective equipment.
4. Report all accidents and injuries, no matter how minor, to your supervisor immediately.
5. Do not operate any equipment you have not been trained and authorized to use.
6. Report any safety hazards or defective equipment immediately to your supervisor.
7. Do not remove, tamper with or defeat any guard, safety device or interlock.
8. Never use any equipment with inoperative or missing guards, safety devices or interlocks.
9. Never possess, or be under the influence of, alcohol or controlled substances while on the premises.
10. Never engage in horseplay or fighting.
11. Participate in, and actively support, the safety program.

Office Safety

Office accidents can and do happen. To prevent them, CCS has developed the following rules for our office staff. We will also endeavor to include office employees in periodic safety meetings. If at any time, you feel there is a safety hazard, or you have any safety concerns, please do not hesitate to notify the Director of Operations.

1. Report all accidents and injuries, no matter how minor, to your Supervisor immediately.
2. Correct or report any safety hazards that you observe.
3. Clean up any spilled material that may present a slipping hazard.
4. Do not stretch any cords across aisles that may present a tripping hazard.
5. No one is allowed to climb on shelves or stand on chairs; you must use a step stool or ladder.
6. Keep all legs of the chair on the floor. Do not tilt chairs too far back.
7. No one shall be in the possession of, or under the influence of, alcohol or other intoxicating substances while on the premises.
8. No horseplay will be tolerated.
9. Close file drawers when not in use.
10. Do not open more than one file drawer at a time. This could cause the cabinet to tip.
11. Do not store heavy objects above your head that could fall on you in an earthquake.
12. Do not store flammable or combustible materials near heaters or other heat sources.
13. If you are unsure how to do any task safely, ask your supervisor.
14. Do not operate any equipment you are not trained and authorized to use.
15. Always follow safe lifting procedures when lifting any object and get help for heavy loads by doing the following:
 - Bend your knees, not your back.
 - Keep the load close to body.
 - Keep your back straight.
 - Lift with your legs.
 - Do not lift and twist.

Office Ergonomics

Studies have shown over the years that poorly designed and arranged work areas and repetitive motions can lead to a variety of injuries including carpal tunnel syndrome and tendonitis, which are often referred to as repetitive motion injuries (RMI). As with cancer, heart disease, and many other ailments, there are risk factors that increase an individual's likelihood of developing RMI. If the risk factors are reduced, so are the chances of being injured. While some of these risk factors, such as family history, cannot be controlled in the employment setting, many can, including:

- The force used to perform a task;
- Posture while performing tasks;
- The number of repetitions performed in a given time period; and
- Mechanical stresses such as hard surfaces.

Proper Adjustments to Office Equipment

The most significant RMI risk factor in office environments is poor body posture caused by improper workstation design or layout. In many cases employees are required to work in awkward positions for long periods of time. This greatly increases the likelihood of injury. Fortunately, this is often the easiest problem to correct. The goal is to perform work in neutral posture as much as possible. Neutral posture is best described as the most comfortable position and usually involves little or no twisting or deviation of the joints.

To apply the principle of neutral posture to the office setting we need to look at the five major components of office workstations. They are: the chair, the computer keyboard, the desk, the computer monitor, and the work product.

Chairs

Chairs are often the most overlooked piece of office equipment, yet they are the single most important item from an ergonomic standpoint. A poor chair that lacks adjustments and support makes it almost impossible to work comfortably and in neutral posture. Good office chairs are fully adjustable including:

- Chair height.
- Height of the backrest.
- The position forward or back of the backrest.
- The position forward or back of the seat pan.
- The angle (tilt) of the seat pan.
- If armrests are provided, they should be height and width adjustable.

In many cases, fully adjustable chairs are provided for employees, but they never adjust them. Make sure you understand all of the adjustments your chair has and how to use them. When in doubt, read the owner's manual or ask. A properly adjusted chair should allow the user to rest their feet comfortably on the floor without putting pressure on their lower thighs. Their knees should be approximately the same height as their hips, or slightly higher, and they should be able

to sit back against the backrest which is positioned for lower back support. If your feet do not rest comfortably on the floor the chair is too high. If the chair cannot be lowered any further, a footrest should be used. Whether armrests are provided depends on the type of workstation and personal preference. If they are provided, they should be height adjustable to allow the arms to rest comfortably on them without excessive shoulder drop. Armrests should also be well padded to reduce pressure on the lower arms.

Keyboards

The keyboard should be positioned to minimize bend in your wrists. In order to accomplish this, it is often necessary to have a position and height adjustable keyboard tray attached to the underside of the desk. Using a tray also frees up workspace on the desk where the keyboard once sat.

The height of the keyboard should be set so that there is approximately a ninety-degree (90°) angle between the upper and lower arms. There should also be a straight line from the elbow out through your fingers. If your fingers hang down too much or bend up, creating a “V” between your hand and forearm, you place extra stress on your wrist. Many people find it comfortable to use padded wrist rests in front of the keyboard. This often helps minimize wrist deflection. The keyboard tray should also be adjusted so that you do not have to reach forward too far to type. Your elbows should be close to your side and back by your spine, not out in front of you. Do not extend the small legs on the bottom of the keyboard tray. This increases the wrist angle unnecessarily. Many keyboard trays now also have extensions for your mouse. This places everything you need within easy reach.

Desks

Desks should be arranged so that you are able to comfortably write and use your office equipment. Some of these items may need to be moved closer to you. Your legs should also fit easily under the desk. Stored items, such as boxes, which block your legs should be removed. The standard desk height is fine for most people. If you are exceptionally tall or short, however, adjusting the desk up or down an inch, if possible, may be helpful.

Work product should be kept within easy reach. Heavy notebooks or binders that you use often should be placed near you. If you use the phone a lot, consider using a headset to reduce neck strain and free up your hands for other tasks. Copyholders can be very helpful if you are entering data or typing from paper. Set them up so they are as close to the screen as possible to reduce neck motion.

Computer Monitors

Your computer monitor should be directly in front of you. Monitors that are off to one side cause you to turn your neck, which can lead to injury. The top of the screen should be at about eye level. If the screen is too low your neck will ache from constantly looking down. Putting old phone books or reams of copy paper under them can easily raise monitors. You may also use a special adjustable monitor holder to free up desk space. Tilt the screen so that the top is closer to you than the bottom. This will reduce glare from overhead lights. If you cannot get away from outside

light, use a glare screen to improve contrast and reduce eyestrain that can cause headaches. Also know how to adjust the screen contrast and brightness controls and keep the screen clean and free of dust and fingerprints.

Force, Repetition, and Mechanical Stress

The risk factors of force, repetition, and mechanical stress are also controllable in an office environment. Force can be reduced by using automatic staplers and date stamps. If heavy files, boxes, or other items must be moved, use carts and dollies. When filing, use two hands to hold the larger files and keep heavy items stored between knee and shoulder height to reduce strain on your back and arms.

Repetition is controllable through the use of task management. Break up the work as much as possible throughout the day. If possible, do not spend more than two hours at a time typing or entering data. Intersperse other tasks such as filing to use other muscle groups. You should take ten-minute breaks every two hours if you are doing repetitive tasks.

Mechanical stress occurs when you rest parts of your body against hard or sharp objects. This cuts off blood flow and presses on nerves, which can lead to numbness and tingling. Sharp edges can be padded or cushioned where needed to reduce this.

Worksite Evaluation and Exposure Reduction.

Each job, process, or operation of identical work activity that has resulted in at least two (2) instances of RMI shall be evaluated for exposures that have caused RMI. CCS may request assistance from outside consultants for this purpose.

Any exposures that have caused RMI shall, in a timely manner, be corrected or if not capable of being corrected have the exposures minimized to the extent feasible. We shall consider engineering controls, such as work station redesign, adjustable fixtures or tool redesign, and administrative controls, such as job rotation, work pacing or work breaks.

Training

Affected employees shall be provided training that includes an explanation of:

- CCS program;
- The exposures which have been associated with RMI;
- The symptoms and consequences of injuries caused by repetitive motion;
- The importance of reporting symptoms and injuries to their supervisor; and
- Methods used to minimize RMI.

This training may be conducted as part of the regular safety meetings.

Fleet & Driving Safety

CCS has established the following guidelines and procedures for our drivers and vehicles to protect the safety of individuals operating any motor vehicle on company business. Protecting our employee drivers, their passengers, and the public is of the highest priority. The commitment of management and employees is critical to the success of this program. Clear communication of, and strict adherence to, the program's guidelines and procedures are essential.

Our primary goal is to maintain a high level of safety awareness and foster responsible driving behavior. Driver safety awareness and responsible driving behavior will significantly decrease the frequency of motor vehicle accidents and reduce the severity of personal injuries and property damage.

Drivers must follow the requirements outlined in this program. Violations of this program may result in disciplinary action up to, and including, suspension of driving privileges or dismissal.

Driver Selection

Only company authorized and assigned employees are allowed to drive company vehicles at any time. Prior to being authorized and assigned, CCS will check the following items. Drivers must have:

- A valid un-restricted driver's license;
- Current, valid driver's insurance; and
- A current driving record on file, reflecting no more than two (2) points and no serious or major violations (any conviction involving driving while under the influence will be deemed to be a serious and major violation).

CCS will also check driving records of all employees authorized to drive on company business on an annual basis.

Employees that do not meet these requirements are not authorized or allowed to drive company vehicles or drive their own vehicle on company business.

Driving Rules

These rules are mandatory for all employees driving on behalf of CCS.

1. Only authorized employees may drive on behalf of CCS . No other family members may drive vehicles on behalf of CCS.
2. Seat belts must be worn in CCS vehicles at all times. You should wear the lap belt low across your hips and have the shoulder strap directly across your chest. You also need to keep the belt tight. There should not be more than an inch between your body and the belt at any point.

3. No employee is permitted to drive vehicles behalf of CCS while impaired by alcohol, illegal or prescription drugs, or over the counter medications. You must be sober and alert at all times while driving.
4. All accidents which occur while driving behalf of CCS must be reported to the office immediately.
5. Employees with two (2) or more preventable accidents in a three (3) year period, or that obtain three (3) points on their driving record, will be subject to a loss of their driving privileges or have their driving privileges restricted.
6. Get the big picture while driving. Keep your eyes aimed high and try to anticipate hazards and other drivers' mistakes. You should be looking well ahead of where you are. You should also always leave yourself an out in case the other driver does the unexpected.
7. Maintain a safe following distance at all times. Approximately one-third ($\frac{1}{3}$) of all auto accidents are rear end collisions. You should be at least two (2) seconds behind the vehicle in front of you to allow yourself sufficient time to stop. Do not tailgate. Following distances should be increased for larger vehicles or if in slippery or rainy conditions.
8. Avoid passing on two lane roads. Head on collisions are the most common cause of fatalities. You should also turn on your headlights while driving on two lane roads. This helps oncoming traffic see and avoid you. Never pass another vehicle on blind turns or hills.
9. Inspect the vehicle for mechanical defects prior to each trip. Test your brakes as soon as you start out to insure they are properly operating. Worn tires can make your vehicle difficult to control or stop.
10. Avoid using your phone and other distracting activities while driving. These actions take your eyes off the road and often cause you to swerve. Pull over into a safe parking area before making that call.
11. Never drive faster than road conditions warrant. Slow down when road conditions are poor (rain, fog, night) and never exceed posted speed limits.
12. Always signal when changing lanes or turning.
13. Use caution when passing any stopped vehicle, especially near intersections or cross walks.
14. Avoid tailgating, rapid lane changes, speeding, and hand gestures to bad drivers. If you are being tailgated, change lanes and let them pass.
15. Intersection collisions are a significant problem. These are often caused by someone running the red light. You should always be under control when approaching an intersection and be prepared to stop if the light changes.

16. Slow down and look for trains at all railroad crossings. Even with modern signals and gates, hundreds of cars are hit by trains each year at grade crossings.
17. Use your low beams while driving in fog and slow down. If you cannot see, pull over into a safe parking area and wait for better visibility. Do not stop in the traffic lanes. You will almost certainly be hit by another vehicle if you do.
18. Always walk behind the vehicle before backing. This will insure that there are no people or objects behind you that you cannot see from the driver's seat. You should also make sure that all loads are properly secured to prevent them from moving. Numerous accidents are caused by objects that have fallen off vehicles carrying freight.
19. Always signal well in advance when changing lanes or turning, and make sure to check your blind spot for other vehicles. Also, avoid driving in someone else's blind spot. If they can't see you, they don't know you are there.
20. Yield the right of way until you are sure the other driver is going to stop. Just because you have the legal right of way does not mean you should always take it. Always yield the right of way to emergency vehicles.
21. Engage in defensive driving by expecting the unexpected, anticipating bad driving by others, looking ahead for hazards, leaving room for evasive maneuvers if necessary, always driving under control, and obeying the rules of the road.

Hazardous Materials and Chemicals Communication Program

It is the policy of CCS that the first consideration of work shall be the protection of the safety and health of all employees. We have developed this Hazard Communication Program to ensure that all employees receive adequate information about the possible hazards that may result from the various materials used in our operations. This Hazard Communication Program will be monitored by the Director of Operations, who will be responsible for ensuring that all facets of the program are carried out, and that the program is effective.

Please note that the following items are not included in the program:

- Foods, drugs, cosmetics or tobacco;
- Untreated wood products;
- Hazardous waste; and
- Consumer products packaged for sale to and use by the general public, provided that our exposure is not significantly greater than typical consumer exposure.

Hazardous Material Inventory

The Director of Operations maintains a list of all hazardous materials used in our operations. This list contains the name of the product, the type of product (solvent, adhesive etc.) and the name and address of the manufacturer.

Material Safety Data Sheets (MSDS)

Copies of MSDS for all hazardous substances to which our employees may be exposed will be kept in a binder in the office at 850 Hampshire Road, Suite P, Thousand Oaks, CA 91261. These MSDS are available to all employees, at any reasonable time, upon request. Copies of the most commonly used products will also be kept by the Supervisor at the work site.

The Director of Operations will be responsible for reviewing incoming MSDS for new and significant health/safety information. They will ensure that any new information is passed on to the affected employees.

The Director of Operations will also review all incoming MSDS for completeness. If an MSDS is missing or obviously incomplete, a new MSDS will be requested from the manufacturer. The California Occupational Safety and Health Administration (“Cal/OSHA”) will be notified if a complete MSDS is not received and the manufacturer will not supply one.

New materials will not be introduced into the shop or field until a MSDS has been received. The purchasing department will make it an ongoing part of their function to obtain MSDS for all new materials when they are first ordered.

Container Labeling

No container of hazardous substances will be used unless the container is correctly labeled and the label is legible.

All chemicals in cans, bags, drums, pails, etc., will be checked by the receiving department to ensure the manufacturer's label is intact, is legible, and has not been damaged in any manner during shipment. Any containers found to have damaged labels will be held until a new label has been installed. New labels will be obtained from the manufacturer.

The label must contain:

- The chemical name of the contents;
- The appropriate hazard warnings; and
- The name and address of the manufacturer.

All secondary containers will be labeled as to their contents with a reference to the original label.

Employee Information and Training

All employees will be provided information and training on the following items through the CCS safety training program and prior to starting work with hazardous substances. Such information and training shall include the following:

1. An overview of the requirements of the Hazard Communication Standard, including their rights under this regulation.
2. Information regarding the use of hazardous substances in their specific work areas.
3. The location and availability of the written hazard communication program. The program will be available from the Supervisor and Director of Operations.
4. The physical and health hazards of the hazardous substances in use.
5. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
6. The controls, work practices and personal protective equipment that are available for protection against possible exposure.
7. Emergency and first aid procedures to follow if employees are exposed to hazardous substances.
8. How to read labels and material safety data sheets to obtain the appropriate hazard information.

Hazardous Non-Routine Tasks

Infrequently, employees may be required to perform hazardous non-routine tasks. Prior to starting this work, each involved employee will be given information by his/her supervisor about hazards to which they may be exposed during such activity.

This information will include:

- The specific hazards;

- Protective/safety measures which must be utilized; and
- The measures the organization has taken to lessen the hazards, including special ventilation, respirators, the presence of another employee, emergency procedures, etc.

Informing Outside Contractors and Vendors

To ensure that outside contractors are not exposed to our hazardous materials, and to ensure the safety of the contractor's employees, it will be the responsibility of the Supervisor to provide outside contractors the following information:

- The hazardous substances under our control that they may be exposed to while at the work site; and
- The precautions the contractor's employees must take to lessen the possibility of exposure.

We will obtain from outside contractors and vendors the name of any hazardous substances the contractor's employees may be using at a work site or bringing into our facility. The contractor must also supply a copy of the material safety data sheet relevant to these materials.

Employee Rights Under The Hazard Communication Standard

At any reasonable time, an employee has the right, upon request, to:

- Access the MSDS folder, and the Hazard Communication Program;
- Receive a copy of any environmental sampling data collected in the workplace; and
- See his/her employment medical records.

Hazard Identification and Evaluation

To assist in the identification and correction of hazards, CCS has developed the following procedures. These procedures are representative only and are not exhaustive of all the measures and methods that will be implemented to guard against injury from recognized and potential hazards in the workplace. As new hazards are identified and improved work procedures developed, they will be promptly incorporated into our Safety Manual.

Loss Analysis

Periodic loss analyses will be conducted by the Director of Operations. These will help identify areas of concern and potential job hazards. The results of these analyses will be communicated to management, supervision, and employees through safety meetings and other appropriate means.

Accident Investigations

All accidents and injuries will be investigated in accordance with the guidelines contained in this program. Accident investigations will focus on all causal factors and corrective action including the identification and correction of hazards that may have contributed to the accident.

Employee Suggestions

Employees are encouraged to report any hazard they observe to their supervisor. No employee of CCS will ever be disciplined or discharged for reporting any workplace hazard or unsafe condition in good faith. However, employees who do NOT report potential hazards or unsafe conditions that they are aware of will be subject to disciplinary action.

Regulatory Requirements

All industries are subject to government regulations relating to safety. Many of these regulations are specific to our type of business. Copies of pertinent regulations can be obtained from the Safety Coordinator/Director of Operations.

Outside Agencies

Several organizations will assist us in identifying hazards in our workplace. These include safety officers from other contractors, insurance carrier safety and health consultants, private industry consultants, the fire department, and Cal/OSHA Consultation.

Periodic Safety Inspections

Periodic safety inspections ensure that physical and mechanical hazards are under control and identify situations that may become potentially hazardous. Inspections shall include a review of the work habits of employees in all work areas. These inspections will be conducted by the Supervisor, Manager, Safety Coordinator/Director of Operations or other designated individual.

Periodic safety inspections will be conducted:

- When new substances, process, procedures or equipment are used;
- When new or previously unrecognized hazards are identified; and
- Periodically by the Safety Coordinator.

These inspections will focus on both unsafe employee actions as well as unsafe conditions. The following is a partial list of items to be checked.

- The proper use, condition, maintenance and grounding of all electrically operated equipment.
- The proper use, condition, and maintenance of safeguards for all power-driven equipment.
- Compliance with the Code of Safe Practices.
- Housekeeping and personal protective equipment.
- Hazardous materials.
- Proper material storage.
- Provision of first aid equipment and emergency medical services.

Any and all hazards identified will be corrected as soon as practical in accordance with the CCS hazard correction policy.

If imminent or life threatening hazards are identified, which cannot be immediately corrected, all employees must be removed from the area, except those with special training required to correct the hazard, who will be provided necessary safeguards.

Documentation of Inspections

Safety inspections will be documented to include the following:

- Date on which the inspection was performed;
- The name and title of person who performed the inspection;
- Any hazardous conditions noted or discovered and the steps or procedures taken to correct them; and
- Signature of the person who performed the inspection.

All reports shall be kept on file for a minimum of two (2) years.

Hazard Correction

The following procedures will be used to evaluate, prioritize and correct identified safety hazards. Hazards will be corrected in order of priority, with the most serious hazards being corrected first.

Hazard Evaluation

Factors that will be considered when evaluating hazards include:

- Potential severity (the potential for serious injury, illness or fatality);
- Likelihood of exposure (the probability of the employee coming into contact with the hazard);
- Frequency of exposure (how often employees come into contact with the hazard);
- Number of employees exposed;
- Possible corrective actions (what can be done to minimize or eliminate the hazard); and
- Time necessary to correct (the time necessary to minimize or eliminate the hazard).

Techniques for Correcting Hazards

1. **Engineering Controls:** Could include machine guarding, ventilation, noise reduction at the source, and provision of material handling equipment. These are the first and preferred methods of control.
2. **Administrative Controls:** The next most desirable method would include rotation of employees or limiting exposure time.
3. **Personal Protective Equipment:** Includes hard hats, hearing protection, respirators and safety glasses. These are often the least effective controls for hazards and should be relied upon only when other controls are impractical.

Documentation of Corrective Action

All corrective action taken to mitigate hazards should be documented. Depending on the circumstances, one of the following forms should be used:

- Safety Contact Report;
- Safety Meeting Report;
- Memo or letter; or
- Safety inspection form.

All hazards noted on safety inspections will be rechecked on each subsequent inspection and notations made as to their status.

Fire Prevention and Emergency Action Plan

CCS has developed the following emergency plan to cover those designated actions that must be taken to ensure employee safety from fire and during other emergencies. Any questions about this plan should be directed to the Director of Operations.

Office, Shop & Warehouse Emergency Evacuation and Fire Prevention

The Director of Operations is responsible for ensuring the following:

1. That all required emergency exits are clearly identified in the office, shop, and warehouse and that all required firefighting and emergency equipment is available and in good condition. The following items will be maintained:
 - First aid kit;
 - Drinking water;
 - Flashlight;
 - Portable battery powered radio and batteries;
 - Fire extinguishers;
 - Wrench to shut off the main gas valve; and
 - Pry bars, axes, saws, tools or similar devices for employee rescue.
2. That there is a facility map designating all emergency evacuation routes and the locations of all fire fighting equipment and emergency supplies and equipment. These maps will be posted in at least two (2) locations in the facility.
3. Training all exposed employees on the procedures to be followed in the event of fire, earthquake or other emergency including how to properly notify other affected employees.
4. Identifying potential fire hazards in the office, shop and warehouse and ensuring that adequate steps are taken to prevent fires.
5. Ensuring that combustible trash and materials are removed promptly from the facility, and that all flammable and combustible liquids are properly stored and handled.

During an Emergency

In the event of an emergency such as earthquake or fire, all employees are expected to evacuate the premises immediately.

Employees will be notified of emergencies through one of the following:

- Fire alarm;
- Intercom;
- Emergency horn; or

- Direct voice communication.

After the emergency evacuation has been completed, a head count will be taken to ensure everyone is out of the building.

Bloodborne Pathogen Exposure Control Plan

I. **INTRODUCTION**

A. **Purpose**

The purpose of this Bloodborne Pathogen Exposure Control Plan is to:

1. Eliminate or minimize employee occupational exposure to blood or certain other body fluids;
2. Comply with the Cal/OSHA's Bloodborne Pathogens Standard (8 CCR § 5193).

B. **Background**

Blood and body fluids may contain pathogens, which are small organisms that can cause serious disease. Some of the most common bloodborne diseases are:

1. Hepatitis B virus ("HBV") and Hepatitis C virus ("HCV"), which causes hepatitis, a potentially fatal liver disease; and
2. Human Immunodeficiency Virus ("HIV"), the cause of Acquired Immunodeficiency Syndrome ("AIDS").

HBV, HCV and HIV are usually passed on when disease organisms enter the body through mucous membranes or through breaks in the skin.

In the school setting, the most common way exposure can occur is when an employee has an open sore or injury and is in contact with blood or other infectious material, or when an employee is not wearing the proper personal protective equipment to protect against contact with infectious material such as blood, human tissue or other body fluids that contain blood.

C. **Management Commitment/Responsibility**

The development and implementation of an exposure control plan requires the commitment of management and participation of all employees at every level within the organization.

1. **Policy Statement**

It is the policy of CCS to provide a safe and healthy work environment for all of its employees by minimizing exposure to bloodborne pathogens.

2. **Responsibility**

- a. It shall be the responsibility of the Director of Operations to review the

organization's bloodborne pathogen exposure control program annually. Whenever necessary, the Exposure Control Plan will be amended to reflect new or modified tasks and procedures, which affect occupational exposure.

- b. It shall be the responsibility of the Director of Operations to conduct facility audits to assess exposure control compliance, including examination of engineering controls on a regular basis to ensure their effectiveness.
- c. The Director of Operations shall coordinate, implement and monitor the training, vaccinations, post-exposure evaluation and follow-up, post-exposure prophylaxis, and record keeping required annually to ensure compliance in accordance with bloodborne pathogens exposure control standards.
- d. The Principal for each school site is responsible for overseeing the implementation of the work practice controls at that site.
- e. The Director of Operations is responsible for assessing and selecting appropriate personal protective equipment.
- f. The Principal for each school site is responsible for ensuring that appropriate personal protective equipment is available to employees at that site. Employees are responsible for wearing the designated personal protective equipment.
- g. The Director of Operations is responsible for maintaining the training records.

II. EXPOSURE DETERMINATION

A. Definition of Occupational Exposure

Any employee with occupational exposure to blood or other potentially infectious materials is covered by the Exposure Control Plan. Potentially infectious materials include the following human body fluids: blood, semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.

Occupational exposure is defined by Cal/OSHA as "reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties." (Parenteral means piercing mucous membranes or the skin barrier through such events as needlesticks, human bites, cuts and abrasions). Further, to be considered "occupational exposure," the contact must result from the performance of an employee's duties.

B. Determination of Occupational Exposure

The Cal/OSHA regulations provide for the Hepatitis B vaccination of certain employees who may reasonably anticipate occupational exposure. Accordingly, it is the organization's responsibility to identify and list the following:

1. Each job classification in which all the employees have reasonably anticipated occupational exposure.
2. Each job classification in which some of the employees have occupational exposure.

In identifying the job classification, CCS must specify the job tasks and procedures in which occupational exposure is reasonably anticipated to occur. These job classifications and related job tasks and procedures are identified in the list that follows, entitled "Job Classifications in Which Employees Have Occupational Exposure to Bloodborne Pathogens."

Consequently, Hepatitis B vaccinations shall be provided to those employees determined by CCS to have occupational exposure to blood and other potentially infectious materials, and to be eligible for vaccination.

Job Classifications in Which Employees Have Occupational Exposure to Bloodborne Pathogens

Below are listed the job classifications at CCS where some or all employees may handle human blood or other potentially infectious materials, and the tasks/procedures which may result in possible exposure to bloodborne pathogens:

JOB CLASSIFICATION

TASKS/PROCEDURES

Employees with Occupational Exposure:

- School Nurses
- Health Assistants

Provision of physical care in which blood or blood-tinged body fluids are present.

Employees with Potential Occupational Exposure:

- Special Education Teachers
- Instructional Assistants
- Paraeducators
- Preschool Teachers
- Special Education Bus Drivers
- Bus Drivers

Provision of physical care or conduct activities with exposure to blood for the developmentally disabled.

- Custodians

OSHA does not generally consider maintenance personnel, janitorial or housekeeping staff in non-health care facilities to have occupational exposure. However, a custodian who cleans the school first-aid room is more likely to have occupational exposure than a custodian who cleans offices

- School Secretaries
- School Support Assistants
- Athletic Coaches
- Campus Monitors

Provision of first aid.

- Science Teachers

Provision of contact with bio-hazardous materials.

III. HEPATITIS B VACCINATION PROGRAM

CCS recognizes that even with good adherence to all exposure prevention practices, exposure incidents can occur. As a result, the organization has implemented a Hepatitis B vaccination program, as well as set up procedures for post-exposure evaluation and follow-up should exposure to bloodborne pathogens occur.

This program is available, at no cost, to all eligible employees who have occupational exposure to bloodborne pathogens.

See Section II, Exposure Determination, to identify those employees who will be offered the vaccination. The vaccination is a series of either two or three injections. Field trials of the vaccines have shown eighty to ninety percent (80% - 90%) efficacy in preventing infections.

Vaccination for employees with occupational exposure will be made available following the required Bloodborne Pathogens training and within ten (10) working days of initial assignment.

Vaccinations are performed under the supervision of a health care professional. Employees taking part in the vaccination program are listed under the section Determination of Occupational Exposure. Employees who are eligible, but have declined to take part in the program are listed as well and have signed the "Vaccination Declination Form." (See **Appendix A**). The completed "Vaccination Declination Forms" shall be maintained by CCS. If any employee signs the "Vaccination Declination Form," but at a later date chooses to receive the vaccination, the organization will make it available at that time.

Employees who are designated first-aid providers are not mandatorily eligible for pre-exposure vaccination, but may be eligible for vaccination in the event the employee renders assistance during a first-aid incident involving the presence of blood or infectious material. See discussion regarding such vaccination under the section regarding Post Exposure Evaluation and Follow-up.

Designated first aid providers are defined as employees who may run a risk of occupational exposure, however, this risk arises in the context of the performance of a "collateral" duty, and is not performed on a regular basis.

IV. METHODS OF COMPLIANCE

There are a number of areas that must be addressed in order to effectively minimize exposure to bloodborne pathogens in our district. These include:

A. Universal precautions

Universal precautions is an approach to infection control. According to the concept of universal precautions, all human blood and body fluids are treated as if known to be infectious.

In the school setting, precautions shall include: hand washing, using gloves and other

appropriate protective equipment, careful trash disposal, and using an Environmental Protection Agency (“EPA”) approved disinfectant known to kill HBV, HCV and HIV. If injectables are given, use of safety syringes are recommended.

Universal precautions shall be used within the school setting at all times to prevent contact with blood or other potentially infectious materials.

All procedures involving blood or other body fluids shall be performed in such a manner as to minimize splashing, spraying, splattering, and generation of droplets of these substances.

B. Engineering and Work Practice Controls

Engineering controls means controls that isolate or remove the bloodborne pathogens hazard from the workplace (e.g., sharps disposal containers). See Section III D on Contaminated Needles and Sharps.

Work practice controls are controls that reduce the likelihood of exposure by altering the manner in which a task is performed.

Hand washing: Thorough hand washing is the single most effective means in preventing the spread of infectious diseases and should be practiced routinely by all school personnel and taught to students as routine hygienic practices.

All employees shall wash hands and any other skin with soap and water and flush exposed mucous membranes with water immediately, or as soon as practicable, following contact of such body areas with blood or other potentially infectious materials.

Employees shall wash their hands immediately, or as soon as possible after removal of gloves or other personal protective equipment.

How to wash hands: Wet hands with running water and apply soap from a dispenser. Lather well. You may wish to remove all jewelry from hands and place in a safe location at this time. Wash vigorously for fifteen (15) to twenty (20) seconds. Soap suspends easily-removable soil and microorganisms, allowing them to be washed off. Running water is necessary to carry away dirt and debris. Rinse well under running water with water draining from wrist to fingertips. Leave water running. Dry hands well with a paper towel and then turn off the faucet with paper towel. Discard the towel in appropriate container. Apply hand cream after frequent hand washing. Use lotion to prevent skin irritation, breakdown and subsequent infection. In some situations running water is not available. Liquid disinfectant and/or towelettes should be substituted temporarily. (Employees with frequent exposure to body fluids should not wear hand jewelry in the workplace.)

Hand washing facilities: Hand washing facilities or antiseptic solutions and/or towelettes (to be used as an immediate but temporary measure in places where hand washing facilities are not available) will be readily accessible. Hand washing facility means a facility

providing an adequate supply of running potable water, soap and single-use towels or hot air drying machines.

C. Personal Protective Equipment

Personal protective equipment is specialized clothing or equipment worn or used by an employee for protection against a hazard (e.g., gloves, eye protection, etc.).

All personal protective equipment used at CCS to provide a barrier against bloodborne pathogens will be provided without cost to employees. Personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the employees' clothing, skin, eyes, mouth, or other mucous membranes.

All personal protective equipment will be inspected periodically and repaired or replaced as needed to maintain its effectiveness. Employees shall be responsible for notifying his or her Supervisor of the need for repair or replacement of such materials.

Reusable personal protective equipment will be cleaned, laundered and decontaminated as needed at no cost to the employees. Personal protective equipment that cannot, for whatever reason, be decontaminated will be disposed of in accordance with biohazard rules and regulations. See Section G. Waste Disposal. Any garments penetrated by blood or other infectious materials will be removed immediately, or as soon as practicable. All potentially contaminated personal protective equipment will be removed prior to leaving a work area. Glasses, reusable gloves and barrier masks shall be decontaminated by the user by soaking in an EPA registered germicide or a fresh solution of one (1) part bleach to ten (10) parts water for at least five (5) minutes (if bleach is used, it must be mixed fresh daily).

Disposable (single-use) latex gloves should be used when contact with blood or body fluids is anticipated (such as a bloody nose). Gloves will be standard components of first-aid supplies in the schools so that they are readily accessible for emergencies and regular care given in school health offices, cafeterias, and athletic training rooms. Gloves shall also be used during decontamination procedures. In some instances, use of latex free gloves may be appropriate. (See Housekeeping for more information on decontamination.)

- Disposable (single-use) gloves shall be replaced as soon as practical when contaminated, torn, punctured or unable to function as a barrier. They shall not be washed or decontaminated for re-use.
- Utility gloves may be decontaminated for re-use if the integrity of the glove is not compromised. Utility gloves must be discarded if they are cracked, peeling, torn, punctured, deteriorated or when their ability to function as a barrier is compromised.

D. Contaminated Needles and Sharps

Broken glassware or other sharps, which may be contaminated shall not be picked up directly with the hands but shall be picked up by utilizing any mechanical means, such as a broom, dustpan or tongs. Gloves should be worn during this procedure.

Contaminated sharps shall NOT be recapped, broken or bent and should be discarded immediately into easily accessible containers that are closable, puncture resistant, leak proof on sides and bottom and properly labeled.

Containers should be located as close as possible to the immediate area where sharps are used (e.g., health room, science classroom, etc.), replaced immediately when full and shall not be allowed to overfill. Full sharps containers may not be stored more than seven (7) days.

When moving containers of contaminated sharps from the area of use, the containers will be closed immediately prior to removal or replacement to prevent spilling or protrusion of contents. The primary container must be placed in a secondary container if leakage is possible. The secondary container must be a container, which is closable, leak-proof, red and appropriately labeled (e.g., a red, labeled plastic bag).

E. Waste Disposal

Disposal of contaminated sharps and other “regulated waste” must be in accordance with the Medical Waste Management Act (“Act”). (Health & Saf. Code § 117600 *et al.*) Cal/OSHA defines “regulated waste” as liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or other potentially infectious materials.

Medical waste under the Act consists of biohazardous waste and sharps waste.

Biohazardous waste is not normally found in the school setting. Biohazardous waste includes waste, which contains recognizable fluid blood. In the event of unusual circumstances, the regulated waste must be double bagged in leakproof, appropriately labeled, color coded red, plastic bags tied and transported in accordance with all applicable state and local regulations.

Sharps waste includes any device having acute rigid corners, edges, or protuberances capable of cutting or piercing, including:

- Hypodermic needles, syringes, blades, and needles with attached tubing; and
- Broken glass items contaminated with medical waste.

Non-regulated waste may be disposed of as regular trash and includes waste such as disposables containing non-fluid blood (dressing, gauze cotton rolls, towels, rags, etc., with small amounts of dried blood or other body fluids). Please note that feminine hygiene products and Band-Aids or dressings with small amounts of dried blood are NOT considered to be medical wastes.

All waste baskets should be lined with disposable plastic bags. It is important to note that if a contaminated item such as a Band-Aid or a small dressing contains dried blood, it may be disposed of as regular trash.

F. Work Area Restrictions

Eating, drinking, applying cosmetics or lip balm, and handling contact lenses are prohibited in areas where occupational exposure may be expected.

Food and drink shall not be kept in refrigerators, freezers, shelves, cabinets, or on countertops or benchtops where blood or other body fluids are present.

G. Housekeeping Practices

Decontamination: Gloves shall be worn during decontamination procedures. All contaminated work surfaces will be decontaminated after completion of associated tasks/procedures, immediately or as soon as feasible after any spill of blood or other potentially infectious materials, and at the end of the work shift if the surface may have become contaminated since the last cleaning. Contaminated furniture, toys, educational materials/equipment shall be decontaminated with an EPA registered germicide or a solution of one (1) part bleach to ten (10) parts water.

Equipment/tools which have become contaminated with blood or other potentially infectious materials shall be decontaminated by using an EPA registered germicide or a 1:10 bleach/water solution prepared daily. Equipment which becomes contaminated will be examined prior to reuse, servicing or shipping, and decontaminated as necessary.

CCS shall assure that the work site is maintained in a clean and sanitary condition and shall determine and implement an appropriate cleaning schedule for rooms where body fluids are present. Schedules shall be as frequent as necessary depending on the area of the school, the type of surface to be cleaned, and the amount and type of soil present.

Custodial and maintenance staff shall wear appropriate personal protective equipment, including general-purpose utility gloves during cleanup of blood or other potentially infectious materials.

All blood and body fluid spills shall be immediately contained and as soon as practicable cleaned up by appropriately trained staff who are equipped to work with potentially infectious materials.

Initial clean-up of blood or other potentially infectious materials from all surfaces including sinks, work areas, equipment, floors, car/bus seats, etc., should be followed with the use of an appropriate disinfectant.

All waste baskets should be lined with a disposable plastic bag. In areas where blood is present, physical care is provided or personal care occurs (e.g., health office, restrooms, locker rooms, science classrooms, etc.), disposable plastic bags should be replaced daily.

H. Laundry Procedures

Laundry contaminated with blood or other potentially infectious materials (e.g., athletic uniforms and towels) should be handled as little as possible and with a minimum of agitation. Contaminated laundry should be bagged at the location of use in a biohazard labeled or color coded red, leak-proof bag. Contaminated laundry should not be sorted or rinsed in the location of use.

If laundry facilities are available and the contaminated laundry is to be laundered at school, the bag will be transported to the site where laundry is done. Universal precautions will be used at all times.

Each of these areas will be reviewed with employees during bloodborne pathogens related training (see Section VII Information and Training in this plan for additional information).

I. Labels and Signs

One of the most obvious warnings of possible exposure to bloodborne pathogens are biohazard labels. Because of this, CCS will implement a biohazard warning labeling program or when appropriate, using red “color-coded” containers.

The following items shall be properly labeled:

- Containers of regulated waste. (see Section III G on Waste Disposal).
- Sharps disposal containers.
- Contaminated laundry bags and containers.
- Contaminated equipment. (e.g., athletic equipment, shop equipment).

V. FIRST AID INCIDENTS INVOLVING THE PRESENCE OF BLOOD OR INFECTIOUS MATERIAL.

Designated first aid providers who have rendered assistance in any situation involving the presence of blood or other potentially infectious material, regardless of whether an actual exposure incident has occurred, have a duty to report such an incident before the end of the work shift during which the first aid incident occurred. The report must contain the information required of employees involved in occupational exposure incidents, as provided below. The report is used in determining whether the employee has been involved in an occupational exposure incident, and the types of

prophylaxis and follow-up treatment required in light of the incident. The report shall be recorded on a list of such first aid incidents, which shall be made available to all employees upon request.

Following a first aid incident involving the presence of blood or infectious material, the Hepatitis B vaccination will be made available to the first aid providers who rendered assistance during the incident within twenty-four (24) hours, regardless of whether an exposure incident occurred. See section regarding Hepatitis B Vaccination Program.

In the event that it is determined that the first aid incident also constituted an exposure incident, the procedures for post-exposure evaluation and follow-up, discussed below, shall be followed.

VI. POST-EXPOSURE EVALUATION AND FOLLOW-UP.

It is the employee's responsibility to report the occurrence of an occupational exposure incident, before the end of the work day during which the incident occurred. An occupational exposure incident is defined as a specific eye, mouth, other mucous membrane, non-intact skin or parenteral contact with blood or infectious material, resulting from the performance of an employee's duties.

The employee's report must contain the following information:

1. Name of the first aid provider who rendered assistance, or employee who suffered an occupational exposure incident.
2. Date and time of the incident.
3. A description of the first aid incident, including:
 - a. Whether potentially infectious materials were involved;
 - b. Source of the blood or infectious material;
 - c. Circumstances under which the incident occurred, i.e., accidental, unusual circumstances;
 - d. Description of where the incident occurred;
 - e. Description of the personal protective equipment used.
4. Explanation as to whether, in the opinion of the employee, an "occupational exposure" incident occurred.
5. The Hepatitis B vaccine was offered to the employee within 24 hours of the incident, whether an exposure occurred or not.

Safety concerns may be reported using the "Employee Safety Contact Report." (See **Appendix B**). In response to a report of an occupational exposure incident, CCS will:

1. Investigate the circumstances surrounding the exposure incident; and

2. Make immediately available to the employee involved in the occupational exposure incident, a confidential medical evaluation and follow-up, including at least the following elements:
 - a. Documentation of the route(s) of exposure, and the circumstances under which the exposure incident occurred; and
 - b. Identification and documentation of the source individual, if feasible and not prohibited by state or local law.

Following such action, the Director of Operations will seek to obtain the consent of the identified source individual to test that individual's blood to determine the presence of antibodies to the HIV, HBV or HCV. Once consent is obtained, the testing shall be done as soon as is feasible.

The Director of Operations will also seek to obtain the consent of the source individual for subsequent disclosure of the results of the above test by the health care provider and the employer, unless the source individual is already known to be infected. If such consent is obtained, the results of the test will be made available to the exposed employee, accordingly. CCS will document the refusal of the source individual to provide such consent in order to establish that consent cannot legally be obtained.

If the employee with occupational exposure consents, CCS will also arrange to collect and test his or her blood for HBV, HCV and HIV status. In addition, an appointment will be arranged for the exposed employee with a qualified health care professional to discuss the employee's medical status.

Finally, the employee will be provided with an evaluation of any subsequent reported illnesses, which are related to the occupational exposure incident. The employee will also be provided with appropriate post-exposure prophylaxis and counseling.

VII. INFORMATION AND TRAINING

All employees who have the potential for exposure to bloodborne pathogens will be trained and furnished with as much information as possible on this issue. Employees will be retrained at least annually to keep their knowledge current. Additionally, all new employees, as well as employees changing jobs or job functions, will be given initial or additional training which their new position requires at the time of their new job assignment.

A. TOPICS

The topics covered in our training program will include but not be limited to:

- An explanation of the symptoms and modes of transmission of bloodborne pathogens.
- An explanation of the use and limitations of methods of control that may prevent or reduce exposure including universal precautions, engineering controls, work practices, and personal protective equipment.

- An explanation of the basis for selection of personal protective equipment. Information on the HBV vaccine, including its efficacy, safety and the benefits of being vaccinated.
- An explanation of the procedure to follow if a first aid incident involving the presence of blood, or an exposure incident occurs, method of reporting the incident, and the medical follow-up that will be made available.
- An explanation of the signs, labels, tags and/or color coding used to denote biohazards (e.g., contaminated sharps containers).
- An accessible copy of the Cal/OSHA standard and an explanation of its contents.
- An explanation of the organization's exposure control plan and the means by which the employee can obtain a copy of the written plan.
- An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials.
- Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment.
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.

Workplace Violence Prevention

CCS is committed to preventing workplace violence and to maintaining a safe work environment. CCS has adopted the following guidelines to deal with intimidation, harassment or other threats of or actual violence that may occur onsite or offsite during work-related activities.

Prohibited Conduct

All employees, students, parents, vendors and business associates should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, “horseplay” or other conduct that may be dangerous to others. Conduct that threatens, intimidates or coerces another employee, student, parent, or vendor will not be tolerated. CCS resources may not be used to threaten, stalk or harass anyone at or outside the workplace. CCS treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor, the Director of Operations, or any member of senior management. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible. Employees should not place themselves in peril, nor should they attempt to intercede during an incident.

Employees should promptly inform the Director of Operations of any protective or restraining order that they have obtained that lists the workplace as a protected area. Employees are encouraged to report safety concerns with regard to intimate partner violence. CCS will not retaliate against employees making good-faith reports. CCS is committed to supporting victims of intimate partner violence by providing referrals to community resources and providing time off for reasons related to intimate partner violence.

Investigations and Enforcement

CCS will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. CCS will not retaliate against employees making good-faith reports of violence, threats or suspicious individuals or activities. To maintain workplace safety and the integrity of its investigation, CCS may suspend employees suspected of workplace violence or threats of violence, either with or without pay, pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

CCS encourages employees to bring their disputes to the attention of their supervisors or the Director of Operations before the situation escalates. CCS will not discipline employees for raising such concerns.

Safety Communication

This section establishes procedures designed to develop and maintain employee involvement and interest in the Safety Manual and IIPP. These activities will also ensure effective communication between management and employees on safety related issues that is of prime importance to CCS.

The following are some of the safety communication methods that may be used:

1. Periodic safety meetings with employees that encourage participation and open, two-way communication.
2. New employee safety orientation and provision of the Code of Safe Practices.
3. Provision and maintenance of employee bulletin boards discussing safety issues, accidents, and general safety suggestions.
4. Written communications from management or the Safety Coordinator, including memos, postings, payroll stuffers, and newsletters.
5. Anonymous safety suggestion program.

Employees will be kept advised of highlights and changes relating to the safety program. Management shall relay changes and improvements regarding the safety program to employees, as appropriate. Employees will be involved in future developments and safety activities, by requesting their opinions and comments, as necessary.

All employee-initiated safety related suggestions shall be properly answered, either verbally or in writing, by the appropriate level of management. Unresolved issues shall be relayed first to the Director of Operations, and then to the President & CEO (if the Director of Operations is unable to resolve the matter in a satisfactory manner).

All employees are encouraged to bring any safety concerns they may have to the attention of management. CCS will not discriminate against any employee for raising safety issues or concerns.

CCS also has a system of anonymous notification whereby employees who wish to inform the company of workplace hazards without identifying themselves may do so by phoning or sending written notification to the following address:

ATTN: Director of Operations
850 Hampshire Road, Suite P
Thousand Oaks, CA 91361
Phone: (818) 769-7241
Fax: (805) 590-7077

Employee Safety Training

CCS is committed to instructing all employees in safe and healthful work practices. Awareness of potential hazards, as well as knowledge of how to control them, is critical to maintaining a safe and healthful work environment and preventing injuries. To achieve this goal, we will provide training to each employee on general safety issues and safety procedures specific to that employee's work assignment.

Such training provides the following benefits:

- Makes employees aware of job hazards;
- Teaches employees to perform jobs safely;
- Promotes two (2) way communication;
- Encourages safety suggestions;
- Creates interest in the safety program; and
- Fulfills Cal/OSHA requirements.

Every new employee will be given instruction by his/her Supervisor in the general safety requirements of their job. A copy of our Code of Safe Practices shall also be provided to each employee.

Managers, Supervisors, and employees will be trained at least twice per year on various accident prevention topics.

Employee training will be provided at the following times:

1. All new employees will receive a safety orientation their first day on the job.
2. All new employees will be given a copy of this Manual (which includes our Code of Safe Practices) and will be required to read and sign for it.
3. All employees given a new job assignment for which training has not been previously provided will be trained before beginning the new assignment.
4. Whenever new substances, processes, procedures or equipment that represent a new hazard are introduced into the workplace.
5. Whenever CCS is made aware of a new or previously unrecognized hazard.
6. Whenever management believes that additional training is necessary.
7. After all serious accidents.
8. When employees are not following safe work rules or procedures.

Training topics will include, but not be limited to:

- Employee's safety responsibility;
- General safety rules;
- Code of Safe Practices;
- Safe job procedures;
- Ergonomics;
- Use of safety equipment;
- Emergency procedures;
- Safe lifting and material handling practices; and
- Contents of safety program

The following training method should be used:

- **Tell them** how to do the job safely;
- **Show them** how to do the job safely;
- **Have them tell you** how to do the job safely;
- **Have them show you** how to do the job safely; and
- **Follow up** to ensure they are still performing the job safely.

Actual demonstrations of the proper way to perform a task are very helpful in most cases.

Emergency Medical Services and First Aid

CCS will ensure the availability of emergency medical services for its employees at all times. We will also ensure the availability of a suitable number of appropriately trained persons to render first aid. The Director of Operations will maintain a list of trained individuals and take steps to provide training for those that desire it.

First-Aid Kits

Every work site shall have access to at least one first-aid kit in a weatherproof container. The first-aid kit will be inspected regularly to ensure that it is well stocked, in sanitary condition, and any used items are promptly replaced. The contents of the first-aid kit shall be arranged to be quickly found and remain sanitary. First-aid dressings shall be sterile and in individually sealed packages.

At a minimum, the following first-aid supplies shall be kept:

Type of Supply Required by Number of Employees

Type of Supplies	Number of Employees			
	1-5	6-15	16-200	200+
Adhesive dressings	X	X	X	X
Adhesive tape rolls, 1-inch wide	X	X	X	X
Eye dressing packet	X	X	X	X
1-inch gauze bandage roll or compress		X	X	X
2-inch gauze bandage roll or compress	X	X	X	X
4-inch gauze bandage roll or compress		X	X	X
Sterile gauze pads, 2-inch square	X	X	X	X
Sterile gauze pads, 4-inch square	X	X	X	X
Sterile surgical pads suitable for pressure dressings			X	X
Triangular bandages	X	X	X	X
Safety pins	X	X	X	X
Tweezers and scissors	X	X	X	X
Cotton-tipped applicators*			X	X
Forceps*			X	X
Emesis basin*			X	X
Flashlight*			X	X
Magnifying glass*			X	X
Portable oxygen and its breathing equipment*				X
Tongue depressors*				X
Appropriate record forms*	X	X	X	X
First-aid textbook, manual or equivalent*	X	X	X	X

**To be readily available but not necessarily within the first-aid kit.*

Drugs, antiseptics, eye irrigation solutions, inhalants, medicines, or proprietary preparations shall not be included in CCS first-aid kits unless specifically approved, in writing, by an employer-

authorized, licensed physician. Other supplies and equipment, if provided, shall be in accordance with the documented recommendations of an employer-authorized licensed physician upon consideration of the extent and type of emergency care to be given based upon the anticipated incidence and nature of injuries and illnesses and availability of transportation to medical care.

First Aid

The designated first aid person on each site will be available at all times to render appropriate first aid for injuries and illnesses. Proper equipment for the prompt transportation of the injured or ill person to a physician or hospital where emergency care is provided, or an effective communication system for contacting hospitals or other emergency medical facilities, physicians, ambulance and fire services, shall also be furnished. The telephone numbers of the following emergency services in the area shall be posted near the job telephone, or otherwise made available to the employees where no job site telephone exists:

1. A company authorized physician or medical clinic, and at least one alternate if available;
2. Hospitals;
3. Ambulance services; and
4. Fire-protection services.

Prior to the commencement of work at any site, the Supervisor or Manager shall locate the nearest preferred medical facility and establish that transportation or communication methods are available in the event of an employee injury.

Each employee shall be informed of the procedures to follow in case of injury or illness through our new employee orientation program, Code of Safe Practices, and safety meetings.

Where the eyes or body of any person may be exposed to injurious or corrosive materials, suitable facilities for drenching the body or flushing the eyes with clean water shall be conspicuously and readily accessible.

Accident Procedures

These procedures are to be followed in the event of an employee injury in the course of employment.

1. **For severe accidents call 911 and request the Paramedics.**
2. **Employees must report all work related injuries to their Supervisor immediately, even if they do not feel that it requires medical attention.** Failure to do so may delay Workers' Compensation benefits, and the employee may face disciplinary action.
3. The Supervisor, employee, and first aid person should determine whether or not outside medical attention is needed. When uncertainty exists on the part of any individual, the employee should be sent for professional medical care.

4. If medical attention is not desired or the employee refuses treatment, you must still fill out a CCS Accident Report in case complications arise later.
5. In all cases, if the employee cannot transport himself or herself for any reason, transportation should be provided.
6. In the event of a serious accident involving hospitalization for more than twenty-four (24) hours, amputation, permanent disfigurement, loss of consciousness or death, phone contact should be made with the office at (818) 769-7241. Contact must also be made with the nearest Cal/OSHA office within eight (8) hours.

Accident Investigation

The Supervisor, Manager, or other designated individual will investigate all work-related accidents in a timely manner. This includes minor incidents and “near accidents,” as well as serious injuries. An accident is defined as any unexpected occurrence that results in injury to personnel, damage to equipment, facilities, or material, or interruption of normal operations.

Responsibility for Accident Investigation

Immediately upon being notified of an accident, the Supervisor, Manager, or other designated individual shall conduct an investigation. The purpose of the investigation is to determine the cause of the accident and corrective action to prevent future reoccurrence, not to fix blame or find fault. An unbiased approach is necessary in order to obtain objective findings.

The Purpose of Accident Investigations

- To prevent or decrease the likelihood of similar accidents.
- To identify and correct unsafe work practices and physical hazards. Accidents are often caused by a combination of these two factors.
- To identify training needs. This makes training more effective by focusing on factors that are most likely to cause accidents.

What Types of Incidents Do We Investigate?

- Fatalities
- Serious injuries
- Minor injuries
- Property damage
- Near misses

Procedures for Investigation of Accidents

Immediately upon being notified of an accident the Supervisor, Manager, or other designated individual will:

1. Visit the accident scene, as soon as possible, while facts and evidence are still fresh and before witnesses forget important details and to make sure hazardous conditions to which other employees or customers could be exposed are corrected or have been removed.
2. Provide for needed first aid or medical services for the injured employee(s).
3. If possible, interview the injured worker at the scene of the accident and verbally “walk” him or her through a re-enactment. All interviews should be conducted as privately as possible. Interview all witnesses individually and talk with anyone who has knowledge of the accident, even if they did not actually witness it.

4. Report the accident to the office at (818) 769-7241. Accidents will be reported by the office to the insurance carrier within twenty-four (24) hours. All serious accidents will be reported to the carrier as soon as possible.
5. Consider taking signed statements in cases where facts are unclear or there is an element of controversy.
6. Thoroughly investigate the accident to identify all accident causes and contributing factors. Document details graphically. Use sketches, diagrams and photos as needed. Take measurements when appropriate.
7. All accidents involving death, disfigurement, amputation, loss of consciousness or hospitalization for more than twenty-four (24) hours must be reported to Cal/OSHA immediately.
8. Focus on causes and hazards. Develop an analysis of what happened, how it happened, and how it could have been prevented. Determine what caused the accident itself, not just the injury.
9. Every investigation must also include an action plan that includes an assessment of how such accidents be prevented in the future.
10. In the event a third party or defective product contributed to the accident, save any evidence as it could be critical to the recovery of claim costs.

Accurate & Prompt Investigations

- Ensures information is available
- Causes can be quickly corrected
- Helps identify all contributing factors
- Reflects management concern
- Reduces chance of recurrence

Investigation Tips

- Avoid placing blame
- Document with photos and diagrams, if needed
- Be objective, get the facts
- Reconstruct the event
- Use open-ended questions

Questions to Ask

When investigating accidents, asking open-ended questions beginning with “who,” “what,”

“when,” “where,” “why,” and “how” will provide more information than closed-ended questions such as, “Were you wearing gloves?”

Examples include:

- How did it happen?
- Why did it happen?
- How could it have been prevented?
- Who was involved?
- Who witnessed the incident?
- Where were the witnesses at the time of the incident?
- What was the injured worker doing?
- What was the employee working on?
- When did it happen?
- When was the accident reported?
- Where did it happen?
- Why was the employee assigned to do the job?

The single, most important question that must be answered as the result of any investigation is: “What do you recommend be done (or have you done) to prevent this type of incident from recurring?”

Once the Accident Investigation is Completed

- Take or recommend corrective action.
- Document corrective action.
- Management and the Safety Coordinator will review the results of all investigations.
- Consider safety program modifications.
- Information obtained through accident investigations can be used to update and improve our current program.

Enforcement of Safety Policies

The compliance of all employees with CCS's Safety Manual and IIPP is mandatory and shall be considered a condition of employment.

Training Programs

The importance of safe work practices and the consequences of failing to abide by safety rules will be covered in the New Employee Safety Orientation and safety meetings. This will help ensure that all employees understand and abide by CCS safety policies.

Retraining

Employees that are observed performing unsafe acts or not following proper procedures or rules will be retrained by their supervisor. A Safety Contact Report may be completed by the supervisor to document the training. If multiple employees are involved, additional safety meetings will be held.

Disciplinary Action

The failure of an employee to adhere to safety policies and procedures established by CCS can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and wellbeing of the employee committing the unsafe act but can also affect the safety of his/her coworkers and customers. Accordingly, any employee who violates any of the organization's safety policies will be subject to disciplinary action.

Note: Failure to promptly report any on-the-job accident or injury, on the same day as its occurrence, is considered a serious violation of the organization's safety policies. Any employee who fails to immediately report a work-related accident or injury, no matter how minor, shall be subject to disciplinary action.

Employees will be disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Often, when an injury occurs, the accident investigation will reveal that the injury was caused because the employee violated an established safety rule and/or safe work practice(s). In any disciplinary action, the supervisor should be cautious that discipline is given to the employee for safety violations, and not simply because the employee was injured on the job or filed a Workers' Compensation claim.

Violations of safety rules and the Code of Safe Practices are to be considered equal to violations of other company policy. Discipline for safety violations will be administered in a manner that is consistent with CCS's Employee Handbook.

APPENDIX A

Vaccination Declination Form

EMPLOYEE NAME: _____

By signing below, I acknowledge the following:

I understand that due to my occupational exposure to blood or other potential infectious materials I may be at risk of acquiring Hepatitis B Virus (“HBV”) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

SIGNATURE: _____

DATE: _____

SECTION 13 – SCHOLAR POLICY – ACTIVITIES OF MILITARY RECRUITERS ON CAMPUS

The United States Code requires that schools receiving federal funds provide military recruiters the same access to secondary school scholars as is provided generally to post-secondary educational institutions and prospective employers of those scholars. This means that the school holds a job fair or college fair, the military must be provided the same access as the employers or colleges.

Compass Charter School provides military recruiters access to scholars' names, addresses and telephone listings upon request by the military recruiters. A scholar or parent may request that this information not be released to military recruiters without prior written parental consent.

SECTION 14 – SCHOLAR POLICY – SCHOLAR HANDBOOK

Please refer to the Parent/Scholar Handbook which are incorporated annually as a part of these Board Policies