

Lighthouse Community Public Schools COVID-19 Prevention Program (“CPP”)

Lighthouse Community Public Schools (“LCPS” or the “School”) has adopted this CPP to control exposures to the SARS-CoV-2 virus that may occur on campus. The School has adopted this CPP to accommodate reopening school for in-person instruction in accordance with COVID-19 and Reopening In-Person Instruction Framework & Public Health Guidance for K-12 Schools in California, 2020-2021 School Year from the California Department of Public Health (“CDPH”). This document additionally complies with the temporary Cal/OSHA regulations issued November 30, 2020 which require a “written COVID-19 prevention plan.” Resumption of in-person instruction presumes that the School has complied with all applicable legal authority and public health guidance, including pursuant to the California Blueprint for a Safer Economy program and California Safe Schools for All Plan. School and worksite administrators should coordinate with state and local health officials to obtain timely and accurate information about the level of disease transmission in the local community before resuming any on-site work practices. Local conditions will influence the decisions that public health officials make regarding community-level strategies.

Date: [INSERT DATE OF BOARD ADOPTION]

Authority and Responsibility

- **Director of Talent and HR, Anna Martin**, and Arlene Aldrette, Director of Operations, who are serving as LCPS’ COVID Liaisons, have overall authority and responsibility for implementing the provisions of this CPP. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.
- All employees are responsible for using safe work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

The School will implement the following in the workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluating potential workplace exposures which employees or other persons at the School campus may encounter.
- Evaluating places where School employees or others may congregate on campus, such as hallways, bathrooms, and break rooms.
- Reviewing and incorporating all applicable federal, state, and local public health guidance related to COVID-19, as well as any other industry-specific guidance.
- From time to time, evaluate existing COVID-19 health and safety measures to determine whether additional or different measures are necessary.
- Periodically conduct inspections to identify any potential COVID-19 unhealthy conditions, work practices, procedures, and to ensure compliance with all COVID-19 health and safety measures.

Employee Participation

The School encourages all employees and their exclusive representative, if any, to participate and assist the School in identifying and evaluating potential COVID-19 workplace hazards. The School will do so by:

- When implementing this plan, the School will consult with employees and coordinate a virtual safety meetings at least one week prior to any staff scheduled to return to work in-person. At the safety meeting, the School will discuss the components of the COVID-19 Prevention Plan. The School will additionally seek input from employees regarding potential COVID-19 hazards. In advance of the virtual safety meeting, employees are encouraged to consider areas on campus which they believe pose a high-risk of COVID-19 transmission, as well as activities on campus that are difficult to complete while complying with all health and safety guidance.
- The School will utilize its existing LCPS Safety Team composed of employees from all groups of School personnel to participate in hazard assessments on campus. These assessments will occur virtually to the greatest extent practicable. These assessments will occur at least monthly. All employees are encouraged to volunteer for participation in hazard assessments and to serve on the Safety Team, and the School will rotate teams of employees, ensuring all groups of School personnel are equally represented to the greatest extent possible.
- If employees have specific COVID-19 hazard concerns, they may contact the School's COVID-19 Liaisons, Anna Martin and Arlene Aldrette, to discuss such concerns, who may be reached at anna.martin@lighthousecharter.org or arlene.aldrette@lighthousecharter.org

Employee Screening and Operations to Slow the Spread of COVID-19

- Employees who have one or more COVID-19 symptoms should notify their supervisor and stay home.
- Sick employees should follow CDC-recommended steps for self-isolation and report their illness to their supervisor and to the School's COVID-19 Liaisons. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with their supervisor, local health departments and healthcare providers.
- Employees who appear to have symptoms upon arrival at work or who become sick during the day should immediately be separated from other employees, students, and visitors, and sent home.
- Should an employee who becomes sick while at work require safe transport, the School will isolate the employee in the designated isolation room on the School's campus and arrange for appropriate transport home or to a healthcare provider. Contact between the sick employee and others will be limited to the greatest extent possible and appropriate PPE will be provided to any staff member who needs to enter the isolation room or interact at a distance closer than six (6) feet to render immediate assistance in an emergency situation.
- Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC-recommended precautions, including quarantining at home if required to do so. Fully vaccinated employees may be able to return to work without quarantining if exposed, but must still report to their supervisor and the COVID-19 Liaisons to obtain clearance before coming to work.

- When implementing in-person health checks, the School will conduct them safely and respectfully. Any staff serving as screeners will be protected using social distancing, barrier or partition controls, or personal protective equipment (“PPE”). However, reliance on PPE alone is a less effective control and is more difficult to implement, given PPE shortages and training requirements.
- The School will complete the health checks in a way that helps maintain social distancing guidelines, such as providing multiple screening entries into the building. Further detailed information regarding the School’s screening procedures may be found in **the LCPS COVID-19 Health and Safety Policy**.
- Should any School employees screen positive while at home or on campus, employees must follow all policies and procedures regarding isolation, quarantine, and testing to prevent or reduce the possible transmission of COVID-19 in the workplace.
- The School will follow guidance from the Equal Employment Opportunity Commission regarding confidentiality of medical records from health checks.
- To prevent stigma and discrimination in the workplace, employee health screenings will be as private as possible. Screeners should not make determinations of risk based on race, country of origin or any other protected characteristics, and be sure to maintain confidentiality of each individual’s medical status and history.

Correction of COVID-19 Hazards

If the School’s hazard assessment reveals any COVID-19 hazards, it will work immediately to correct any and all such hazards. The Director of Operations will be responsible for correcting COVID-19 hazards. Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form. Any COVID-19 hazards will be corrected in a timely manner based on the severity of the hazards.

Control of COVID-19 Hazards

Physical Distancing

Where possible and reasonable, the School will alter workspaces to help employees and students maintain social distancing and physically separate employees from each other and from students, such as:

- Implement flexible worksites (e.g., telework).
- Implement flexible work hours (e.g., rotate or stagger shifts to limit the number of employees in the workplace at the same time).
- Increase physical space between employees at the worksite by modifying the workspace.
- Increase physical space between employees and students (e.g., physical barriers such as partitions).
- Use signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.
- Implement flexible meeting and travel options (e.g., postpone non-essential meetings or events in accordance with state and local regulations and guidance).
- Close or limit access to common areas where employees are likely to congregate and interact.
- Prohibit handshaking and other forms of close physical contact.
- Deliver services remotely (e.g., phone, video, or web).

- Adjust School practices to reduce close contact with and among students — for example, by using larger formal spaces (e.g., auditoriums) or outdoor areas for instruction as appropriate and available.
- Activities where there is increased likelihood for transmission from contaminated exhaled aerosols, such as band and choir practice and performances, are permitted outdoors only provided that precautions such as physical distancing and use of face coverings are implemented to the maximum extent.
- When it is not possible to maintain a distance of at least six (6) feet, individuals shall be as far apart as possible.
 - o In this situation, the School will evaluate the need for additional eye protection and respiratory protection, consistent with CCR Title 8, section 5144.
 -

Face Coverings

- Until lifted, the CDPH has ordered that all persons must wear a cloth face covering at work if the hazard assessment has determined that they do not require PPE (such as a respirator or medical facemask) for protection.
 - o A cloth face covering contains the wearer’s respiratory droplets to help protect their co-workers and others.
 - o Cloth face coverings are not considered PPE. They help prevent those who do not know they have the virus from spreading it to others, but do not offer the same level of protection for wearers from exposure to the virus that causes COVID-19 as PPE.
 - o All School staff must wear either a cloth face covering with a School-issued disposable medical-grade surgical mask underneath or a provided N95 or KN95 School-issued 5-use mask. School staff may choose which type of face covering to wear between these two options.
- Remind employees that CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain, especially in areas of significant community-based transmission. Wearing a cloth face covering, however, does not replace the need to practice social distancing.
- As necessary, the School will provide clean and undamaged face coverings. The School will provide either disposable medical-grade surgical masks or 5-day use N95 or KN95 masks to every employee working in-person.
- All face coverings must be worn, cleaned, and replaced as needed, and unless an applicable exception to wearing a facial covering applies, consistent with the School’s COVID-19 Health and Safety Policy.
- If an employee cannot wear a face covering, face shield with a drape, respiratory protection, or another effective alternative to a facial covering due to a documented disability or serious medical condition, the employee shall be kept at least six (6) feet apart from all other employees, students, and persons, unless the unmasked employee is tested at least twice per week for COVID-19. However, testing an employee twice per week is not an alternative to wearing a facial covering where otherwise required and able to do so.

Engineering controls

- To the maximum extent feasible, the School will implement all appropriate actions to protect employees where six (6) feet of physical distancing cannot be maintained, consistent with the

COVID-19 Health and Safety Policy, as well as this Plan.

- To the maximum extent feasible, the School will maximize the quantity of outside air in buildings or by natural ventilation systems, except when the United States EPA Air Quality Index is greater than one hundred (100) for any pollutant, or if opening windows or doors would cause additional hazards to employees.
- The School will conduct weekly inspections of the HVAC system.
- To the extent feasible, the School will increase the filtration efficiency of its existing ventilations systems to the highest level that is safely allowable and provide filtration units for classrooms and spaces where the filtration level does not meet the MERV-17 standard or higher as recommended by the CDPH.

Routine Cleaning and Disinfecting

The School will follow the CDC and CDPH's Guidance for Cleaning and Disinfecting to develop, implement, and maintain a plan to perform regular cleanings to reduce the risk of exposure to COVID-19, including:

- Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
 - If surfaces are dirty, clean them using a detergent or soap and water before you disinfect them in accordance with Healthy Schools Act protocols.
 - For disinfection, most common, EPA-registered, household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is available on the EPA website. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method, and contact time).
- Discourage workers from using each other's phones, desks, offices, or other work tools and equipment, when possible.
- Provide disposable disinfecting wipes so that employees can wipe down commonly used surfaces (e.g., keyboards, remote controls, desks, other work tools and equipment) before each use.
- Store and use disinfectants in a responsible and appropriate manner according to the label.
- Do not mix bleach or other cleaning and disinfection products together. This can cause fumes that could be very dangerous to breathe in.
- Advise employees to always wear gloves appropriate for the chemicals being used when they are cleaning and disinfecting and that they may need additional PPE based on the setting and product.

Enhanced cleaning and disinfection after persons suspected/confirmed to have COVID-19 have been in the facility:

- In the event of a suspected or confirmed COVID-19 case at the School, the School will determine all areas, materials, and equipment used by the case during the high-risk exposure period.
- Once identified, the School will follow all CDC cleaning and disinfection recommendations of all pertinent areas.
- In the event of a positive case, the School will complete all required cleaning procedures, utilizing an outside cleaning service if necessary.

Shared Tools, Equipment and Personal Protective Equipment (PPE)

- The School will not allow any employees, students, or any other persons to share any form of PPE, including but not limited to: Gloves, facial coverings, masks, face shields, and goggles.
- To the maximum extent feasible, the School will prohibit the sharing of tools and equipment, including: Phones, headsets, desks, keyboards, and writing materials. Where sharing is required, the School will follow all cleaning and disinfection procedures, consistent with this Plan.

Hand Sanitizing and Personal Protective Equipment (PPE) used to Control Employees' Exposure to COVID-19

The School will:

- Provide tissues and no-touch trash cans.
- Provide soap and water in the workplace. If soap and water are not readily available, the School will provide alcohol-based hand sanitizer that is at least 60% alcohol. Ensure that adequate supplies are maintained. All employees are encouraged to wash their hands frequently and will be provided ample time to do so. Employees should wash their hands for at least twenty (20) seconds each time.
- To the extent feasible, dependent on a hazard assessment, and consistent with the School's COVID-19 Health and Safety Plan, the School will provide additional handwashing facilities and touchless hand sanitizing stations in highly trafficked areas without access to sinks with soap and water.
- Ideally, place touchless hand sanitizer stations in multiple locations to encourage hand hygiene.
- Place posters that encourage hand hygiene to help stop the spread at the entrance to the workplace and in other workplace areas where they are likely to be seen. This should include signs for non-English speakers, as needed.
- Direct employees to visit CDC's coughing and sneezing etiquette and clean hands webpage for more information.
- The School will evaluate the need for additional eye protection and respiratory protection, consistent with CCR Title 8, section 5144.

Investigating and Responding to COVID-19 Cases

- Effective immediately, upon one (1) "COVID-19 case"¹ in the workplace, the School will:
 - Investigate the COVID-19 case, determine the day and time the COVID-19 case was last present on the School campus, the date of the positive test and/or diagnosis, and the date the case has one (1) or more COVID-19 symptoms, if any.
 - Investigate whether other School employees or any other third parties may have had a COVID-19 exposure by evaluating the activities of the COVID-19 case at the School campus during the "high-risk exposure period"².

¹ Cal/OSHA regulations define a "COVID-19 case" as a person who: 1) Has a positive COVID-19 test, 2) is subject to a COVID-19 related order to isolate issued by a local health department or state health official, or 3) has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

² "High-risk exposure period" is defined by Cal/OSHA as: 1) For individuals with COVID-19 symptoms, from two (2) days before the symptoms first develop until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or 2) for

- o Give notice of potential exposure, within one (1) business day, and without revealing any personal identifying information³ of the COVID-19 case, to:
 - 1) All employees and their authorized representatives, if any, who may have had COVID-19 exposure, and
 - 2) Independent contractors and other employers present at the workplace during the high-risk exposure period.
- o Offer testing for COVID-19 to all employees with potential COVID-19 exposure in the workplace, at no charge and during working hours, as well as:
 - Information regarding COVID-19-related benefits under all applicable federal, state, and local laws, as well as potential salary continuation rights during any period of exclusion due to the COVID-19 exposure.
- o Investigate the potential that workplace conditions contributed to the risk of COVID-19 exposure, as well as remedial steps that could have been taken to reduce the risk of COVID-19 exposure.
- Effective immediately, and in the event of a confirmed COVID-19 case at the School campus, the School will notify the local public health department, as required by law.
- Effective immediately, upon notice of any COVID-19-related serious illnesses or death⁴ of an employee occurring in a place of employment or in connection with any employment, the School will immediately report such information to Cal/OSHA.

AB 685 Compliance

Effective January 1, 2021, employers are required to provide certain notices in response to a “notice of potential exposure to COVID-19,” in accordance with Labor Code section 6409.6. A “notice of potential exposure” means any of the following:

- Notification from a public health official or licensed medical provider that an employee was exposed to a qualifying individual at the worksite;
- Notification from an employee, or their emergency contact, that the employee is a qualifying individual;
- Notification through the School’s testing protocol that the employee is a qualifying individual; or
- Notification from a subcontracted employer that a qualifying individual was on the schoolsite.

Upon receipt of a “notice of potential exposure,” the School must take the following actions within one (1) business day of the notice:

asymptomatic individuals who test positive for COVID-19, from two (2) days before until ten (10) days after the first positive COVID-19 test specimen was collected.

³ All personally identifying information related to COVID-19 cases or those with COVID-19 symptoms shall be kept confidential. However certain information may be provided to public health authorities, as required by law.

⁴ Pursuant to 8 CCR §330(h), “Serious injury or illness means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement.”

- Provide a written notice to all employees who were on the premises in the same worksite⁵ as the qualifying individual⁶ within the infectious period⁷ that they may have been exposed to COVID-19.⁸
- Provide a written notice to the exclusive representative, if any, of the above employees.⁹
- Provide all employees who may have been exposed and the exclusive representative, if any, with information regarding COVID-19-related benefits to which employees may be entitled under applicable federal, state, or local laws.
 - Information regarding COVID-19-related benefits includes, but is not limited to, workers' compensation, and options for exposed employees, including COVID-19-related leave, School sick leave, state-mandated leave, supplemental sick leave, or negotiated leave provisions, as well as antiretaliation and antidiscrimination protections applicable to employees.
- Notify all employees, and the employers of subcontracted employees and the exclusive representative, if any, on the disinfection and safety plan that the employer plans to implement and complete per the guidelines of the federal Centers for Disease Control.
- Records of the above notices must be retained for a minimum of three (3) years.

Effective January 1, 2021 the School must also take the following responses in the event of a COVID-19 “outbreak,” as defined by CDPH:

- Within forty-eight (48) hours, the Chief Executive Officer or designee shall notify the county public health department of the names, number, occupation, and worksite of employees who meet the definition of a qualifying individual.¹⁰
- The Chief Executive Officer or designee shall also report the address and NAICS code of the worksite where the qualifying individuals work.
- Additional notice will be provided of any subsequent laboratory-confirmed cases of COVID-19 at the worksite.

⁵ The “worksite” does not include buildings, or floors within multistory buildings, that a qualifying individual did not enter. If the School operates multiple worksites, the School must only notify employees who worked at the same worksite as the qualified individual. (Labor Code § 6409.6, subd. (d)(5).)

⁶ A “qualifying individual” means (a) a laboratory-confirmed case of COVID-19, as defined by the State Department of Public Health; (b) a positive COVID-19 diagnosis from a licensed health care provider; (c) a COVID-19-related order to isolate provided by a public health official; (d) died due to COVID-19, in the determination of a county public health department or per inclusion in the COVID-19 statistics of a county. (Labor Code § 6409.6, subd. (d)(4).)

⁷ The “infectious period” means the time a COVID-19-positive individual is infectious, as defined by the State Department of Public Health. (Labor Code § 6409.6, subd. (d)(2).)

⁸ Written notice must be provided in the same manner that the School ordinarily uses to communicate employment-related information. Written notice may include, but is not limited to, personal service, email, or text message if it can reasonably be anticipated to be received by the employee within one business day of sending and shall be in both English and the language understood by the majority of the employees.

⁹ Written notice to the exclusive representative must contain the same information as required in an incident report in a Cal/OSHA Form 300 injury and illness log unless the information is inapplicable or unknown to the school. This requirement does not apply if the school’s employees do not have an exclusive representative.

¹⁰ A “qualifying individual” means (a) a laboratory-confirmed case of COVID-19, as defined by the State Department of Public Health; (b) a positive COVID-19 diagnosis from a licensed health care provider; (c) a COVID-19-related order to isolate provided by a public health official; (d) died due to COVID-19, in the determination of a county public health department or per inclusion in the COVID-19 statistics of a county. (Labor Code § 6409.6, subd. (d)(4).)

Systems for Communicating

The School's goal is to ensure effective two-way communication with its employees, in a form they can readily understand, and that it includes the following information:

- Train employees on how implementing any new policies to reduce the spread of COVID-19 may affect existing health and safety practices.
- Communicate to any contractors or on-site visitors about changes that have been made to help control the spread of COVID-19. Ensure that they have the information and capability to comply with those policies.
- Create and test communication systems that employees can use to self-report if they are sick and that you can use to notify employees of exposures and closures.
- Use a hotline or another method for employees to voice COVID-19 hazard concerns anonymously or otherwise report COVID-19 symptoms. All staff should use the COVID-19 Report a Positive Case/Exposure or COVID-19 Safety Concern form found at this link: <https://forms.gle/t7G6WgGH7QSB4AVG6>. Consistent with the Employee Handbook and all applicable policies, the School will not tolerate discrimination, harassment, or retaliation against any employee who reports COVID-19 symptoms or hazards.
- Protection of employees at higher risk for severe illness through supportive policies and practices, including older adults and people of any age who have serious underlying medical conditions or are at higher risk for severe illness from COVID-19. This may include but is not limited to the following methods:
 - Providing options to telework, if available and reasonable,
 - Offering vulnerable workers duties that minimize their contact with students and other employees, if the worker agrees to this, and
 - Offering flexible options such as telework to employees where available and reasonable to eliminate the need for employees living in higher transmission areas to travel to workplaces in lower transmission areas and vice versa.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with the workplace) may be exposed to, what is being done to control those hazards, and the School's COVID-19 policies and procedures.

COVID-19 Testing:

- Consistent with Cal/OSHA regulations, in the event of one (1) COVID-19 case, an outbreak¹¹, or a major outbreak at the School campus, the School will offer COVID-19 testing to employees with exposure at no charge, and during working hours.
- In the event of one (1) COVID-19 case in the workplace, COVID-19 testing will be offered to all employees who have had potential COVID-19 exposure.
- In the event of a COVID-19 outbreak pursuant to Cal/OSHA regulations:
 - The School must provide testing to all employees who were present in the exposed workplace.
 - Pursuant to Cal/OSHA regulations, "employees in the exposed workplace shall be tested

¹¹ An outbreak is defined by Cal/OSHA as one that is declared by the local public health department, or where there are three or more cases on campus within a 14-day period. 8 CCR §3205.1(a)(1). Recent Cal/OSHA "FAQ" further indicates that "Any confirmed COVID-19 case who has been in the exposed workplace during the high-risk exposure period counts towards the three-case threshold." As such, outbreak threshold under the Cal/OSHA regulations could be met by way of students who test positive on campus.

and then tested again one week later.”

- o After the first two (2) COVID-19 tests, the School must provide continuous COVID-19 testing of employees remaining at the workplace at least once per week, until outbreak criteria are no longer met.
- In the event of a “major COVID-19 outbreak,”¹² the School will provide COVID-19 testing at least twice per week to all employees present at the exposed workplace during the thirty (30) day period, and who remain at the workplace. This testing regimen will continue until there are no new COVID-19 cases in the workplace for a fourteen (14) day period.
- Consistent with current Cal/OSHA regulations, the School will require certain frequencies of COVID-19 testing before allowing employees with COVID-19 exposure to return to campus.
- In the event that COVID-19 testing is mandated by Cal/OSHA regulations, School employees may procure testing for COVID-19 via:
 - o A testing kit for a saliva-based or otherwise authorized SARS-COV2 molecular test provided by the School and available on every campus to every employee and student both for the asymptomatic testing requirements as listed in the School’s COVID-19 Asymptomatic Testing Policy and in the instance of suspicion of COVID-19 due to symptoms or exposure.
- If COVID-19 is not mandated by Cal/OSHA regulations, but testing is otherwise needed, employees may procure testing, likely free of charge, through their local county or from their health provider.
- Employees are directed to follow the specific guidance regarding regular testing for non-symptomatic individuals that can be found in the LCPS COVID-19 Asymptomatic Testing Policy. LCPS will continue to offer asymptomatic testing through its preferred testing provider free of charge to all employees, though any employee may choose to provide the School with copies of their testing results obtained through a provider of their choice in lieu of utilizing the School’s selected testing provider.

Training and Instruction

The School will provide effective training and instruction that includes:

- The School’s COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - o COVID-19 is an infectious disease that can be spread through the air.
 - o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - o An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.

¹² Cal/OSHA defines a major outbreak as “20 or more COVID-19 cases in an exposed workplace within a 30-day period.”

- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- The School will use the **Appendix D: COVID-19 Training Roster** to document this training.

Exclusion of COVID-19 Cases

- Effective immediately, and pursuant to current Cal/OSHA regulations:
 - All employees with COVID-19 exposure shall be excluded from the School campus for up to fourteen (14) days from the last known exposure to a COVID-19 case.
 - School employees with confirmed COVID-19 must not return to the School campus as follows¹³:
 - For Employees who test positive and have symptoms consistent with COVID-19:
 - 1) At least twenty-four (24) hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications,
 - 2) COVID-19 symptoms have improved, and
 - 3) At least ten (10) days have passed since COVID-19 symptoms first appeared.
 - Employees who test positive but remain asymptomatic shall not return to the School campus until at least ten (10) days have passed since the date of specimen collection of their first positive COVID-19 test.
- Employees excluded from work due to COVID-19 exposure may be entitled to salary continuation during the fourteen (14) day exclusion period. The School will provide paid sick leave during this period up in compliance with applicable regulations and will continue to provide paid leave should an employee use all available leave and draw down their sick time accruals to twenty-four (24) hours or less provided the employee provides appropriate documentation of their need and qualification for such leave. Any salary continuation benefits will account for funds received from public sources during this period, as well as any indemnity benefits as part of any workers' compensation claim related to the employee's COVID-19 exposure.
- If a COVID-19 case is not work-related pursuant to all applicable workers' compensation laws, School employees are not entitled to salary continuation during the fourteen (14) day exclusion period.
- If a School employee is unable to work for reasons other than protecting other employees or students at the School campus from possible COVID-19 transmission, the employee is not entitled to salary continuation during the fourteen (14) day exclusion period.

Reporting, Recordkeeping, and Access

- The School will maintain records of the steps taking to implement this Plan for at least one (1) year, consistent with 8 CCR §3202(b).
- This Plan shall be made available at the workplace to all School employees, authorized

¹³ The School will not require a negative test prior to an employee returning to work. 8 CCR 3505(c)(11)(D).

representatives, and Cal/OSHA representatives immediately upon request.

- The School will track all COVID-19 cases, by keeping a record of the employee’s name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. This information will be documented in “**Appendix C: Investigating COVID-19 Cases.**” Medical information shall be kept confidential. The information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.
- The School will report information about COVID-19 cases at the workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- The School will report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring on campus or in connection with any employment.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

I attest that I have reviewed the School’s COVID-19 Prevention Plan and approve of the contents herein:

Printed Name

Date

Signature

Appendix A: Identification of COVID-19 Hazards

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

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

Person conducting the evaluation: [INSERT NAME/TITLE]

Date: [INSERT]

Name(s) of employee and authorized employee representative that participated: [INSERT NAME/TITLES]

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

--	--	--	--

Appendix B: COVID-19 Inspections

Date: [INSERT]

Name of person conducting the inspection: [INSERT NAME/TITLE]

Work location evaluated: [INSERT]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
One-way directional signage and controls			
Isolation room availability and use			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
Daily screening procedures including temperature scanning and completion of screener			
Limiting visitors and non-essential personnel			
Limiting cohort mixing			
Other Controls			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Asymptomatic testing requirements			

Appendix C: Investigating COVID-19 Cases

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

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

Date: [INSERT]

Name of person conducting the investigation: [INSERT NAME/TITLE]

COVID-19 Case Investigation Information

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

Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

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

Appendix D: COVID-19 Training Roster

Date: [INSERT]

Person that conducted the training: [INSERT NAME]

Employee Name	Signature

Additional Consideration #1: Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

COVID-19 testing

- In the event of a COVID-19 outbreak pursuant to Cal/OSHA regulations:
 - The School must provide testing to all employees who were present in the exposed workplace.
 - Pursuant to Cal/OSHA regulations, “employees in the exposed workplace shall be tested and then tested again one week later.”¹⁴
 - After the first two (2) COVID-19 tests, the School must provide continuous COVID-19 testing of employees remaining at the workplace at least once per week, until outbreak criteria are no longer met.

Exclusion of COVID-19 cases

The School will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with this CPP and local health officer orders, if applicable.

Investigation of Workplace COVID-19 illness

The School will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with this CPP section titled, “Investigating and Responding to COVID-19 Cases.”

COVID-19 Investigation, Review and Hazard Correction

Immediately upon the occurrence of an outbreak, the School will perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19. The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - The School’s leave policies and practices and whether employees are discouraged from remaining home when sick,
 - The School’s COVID-19 testing policies,
 - Insufficient outdoor air,
 - Insufficient air filtration, and
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues,
 - In response to new information or to new or previously unrecognized COVID-19 hazards, and
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. The School will consider:

¹⁴ 8 CCR §3205.1(b)(2)A).

- Moving indoor tasks outdoors or having them performed remotely,
- Increasing outdoor air supply when work is done indoors,
- Improving air filtration,
- Increasing physical distancing as much as possible,
- Respiratory protection.

Notifications to the Local Health Department

- Consistent with the Section of this CPP titled “AB 685 Compliance,” immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in the workplace, the School will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- The School will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and NAICS code of the workplace of the COVID-19 case, and any other information requested by the local health department. The School will continue to give notice to the local health department of any subsequent COVID-19 cases at the workplace.

Additional Consideration #2: Major COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

COVID-19 Testing

The School will provide COVID-19 testing at least twice per week to all employees present at the exposed workplace during the thirty (30) day period, and who remain at the workplace. This testing regimen will continue until there are no new COVID-19 cases in the workplace for a fourteen (14) day period.

Exclusion of COVID-19 Cases

The School will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with this CPP and any relevant local health department orders, if applicable.

Investigation of Workplace COVID-19 illnesses

The School will comply with the requirements of this CPP titled “Investigating and Responding to COVID-19 Cases.”

COVID-19 Hazard Correction

In addition to the requirements of this CPP, the School will take the following actions:

- In buildings or structures with mechanical ventilation, the School will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, the School will use filters with the highest compatible filtering efficiency. The School will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- The School will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- The School will evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the Local Health Department

The School will comply with the requirements of this CPP and the section titled “COVID-19 Outbreaks-Notifications to the Local Health Department.