

COVID-19 Prevention Program (CPP) for Eureka City Schools

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

Date: 1/23/2021

Authority and Responsibility

John Leonard, Director of Student Services, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Employees shall notify their immediate supervisors of any potential workplace Covid-19 hazards. Supervisors shall evaluate all reported potential hazards as soon as possible.

Employee screening

All employees shall self-screen according to CDPH guidelines prior to reporting to any work site, and if they begin to experience any Covid-19 symptoms once they arrive at the work site they shall immediately notify their workplace supervisors and leave the workplace.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix B: COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

The severity of all reported or noted workplace hazards shall be investigated by the workplace supervisor and immediate action shall be taken by trained personnel to correct the hazard as soon as possible. Ventilation systems shall be inspected and maintained by trained maintenance and custodial personnel to ensure they are working correctly. Ventilation and heater filters shall

be changed as needed, but not less than three times per year. Air purifier filters shall be inspected monthly by custodial staff and changed as needed but not less than three times per year. All workplace hazards caused by employees not following Covid-19 workplace rules shall be immediately reported to the workplace supervisor, and the employee shall be given immediate corrective counseling to rectify the issue.

Control of COVID-19 Hazards

Physical Distancing

We ensure at least six feet of physical distancing at all times in our workplace by:

- **Employees have been instructed not to congregate in the workplace. No face to face meetings shall be held inside any facility with 10 or more employees, unless all employees are able to maintain a minimum of 6 foot social distancing, all employees are wearing face coverings and the meeting is unable to be conducted virtually. All employees are instructed to maintain a minimum of 6 feet social distancing whenever possible, both inside and outside. Employees who are unable to maintain 6 feet of distance from each other due to the nature of the job duties they perform, shall be instructed to wear face coverings that cover their mouth and nose and to wash their hands frequently. Employees shall be provided face coverings, face shields, gloves and/or any other required personal protective equipment at district expense.**
- **Employees working in close proximity, who are able to complete their job duties remotely, may be allowed to work remotely in order to reduce the number of employees in the workplace.**
- **The number of visitors or other employees entering a workplace shall be limited to ensure that a minimum of 6 feet of social distancing is maintained inside any room or office.**
- **Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel shall be posted as needed.**
- **Staggered arrival, departure, work, and break times shall be instituted as needed to reduce the number of employees at the worksite.**
- **Work processes or procedures shall be put into place to allow adequate distance between employees.**

Face Coverings

We shall provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. All employees shall be issued at least two cloth face masks annually and additional facemasks shall be provided when requested by the employee. Disposable face coverings shall be provided to employees as needed in order to perform their duties. All visitors to the workplace are instructed to wear face coverings while on any of our sites. Disposable face coverings will be provided to visitors if they do not have their own face covering available to them. Visitors who refuse to wear a face covering shall be denied entry to facilities. Any employee refusing to wear face coverings as instructed shall be subject to immediate discipline in accordance with district and bargaining unit agreements.

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

- **When an employee is working alone in a room.**
- **While eating and drinking at the workplace, provided employees are at least six feet apart and outside air is supplied to the area if indoors.**
- **Employees outside and maintaining at least 6 feet of distance from other persons.**
- **Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders who are unable to wear face covering due to a medical or mental health**

condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

- When specific job duties cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Engineering controls

We have implemented the following measures for situations where we cannot maintain at least six feet between individuals:

- Installed fixed barriers or dividers in common areas, including plastic or glass units where installing solid partitions was not possible.
- Maximized, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by opening windows or doors. When possible, heating units circulate exterior air only into interior spaces to allow outside air ventilation.
- Installed MERV 13 filters in all heating and ventilation units and ventilation systems will be inspected at least three times per year to ensure the units are properly maintained and adjusted.
- Replaced air filters as needed and will replace not less than three times per year.
- When outside filtered air cannot be introduced to the room, installed air purification units in rooms or offices to filter and clean the air as often as possible.

Cleaning and disinfecting

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

- Trained staff has been provided disinfectant wipes to ensure that all frequently touched surfaces are disinfected frequently.
- Custodial staff clean and disinfect all classrooms and offices as well as restrooms and common areas daily, and fog the entire room with disinfectant to kill airborne viruses as the custodian leaves the room.
- Ensure adequate supplies and adequate time for cleaning and disinfecting to be done properly.
- Inform employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.

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

- The windows to offices, classrooms and common areas shall be opened to allow fresh air into the rooms. Doors to other shared spaces will be closed.
- Workplace will not be utilized for 8 to 24 hours after the identified COVID 19 exposure to allow the workspace to be properly ventilated. Custodial Staff shall clean and wipe down surfaces with disinfectant and shall fog the entire area with disinfectant before reclosing the room. If Custodial Staff are unavailable to properly clean and sanitize the room an outside vendor will be used to perform the cleaning and sanitizing of the area. All custodial staff have been properly equipped and trained to sanitize these areas following a COVID-19 positive case.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared (e.g., gloves, goggles and face shields).

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must not be shared, to the extent feasible.

Where there must be sharing, the items will be disinfected between uses by staff wiping down all multiuser items with disinfectant wipes.

Sharing of vehicles has been minimized to the extent feasible by assigning dedicated vehicles to employees. All high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) are disinfected between users for any shared vehicle.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

Provide hand sanitizers to all employees or employee workplaces with instructions to use them frequently.

- **Custodial staff ensure handwashing and hand sanitizing facilities are kept stocked by checking them at least once every four hours.**
- **Additional handwashing stations are installed as needed.**
- **We encourage and allow time for employee handwashing.**
- **We provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).**
- **We encourage employees to wash their hands for at least 20 seconds each time.**

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

With respect to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

Employees who have potential COVID-19 exposure in our workplace will be:

- **Instructed to report any illness or possible exposure. Employees shall be questioned by their supervisors, and a report shall immediately be made to the Personnel Director. If a worker believes they were exposed at the workplace COVID-19 testing shall be offered to them at no cost during their working hours.**
- **Information on benefits and exclusion of possible or positive COVID-19 cases, will be provided to them by the Personnel Director.**

System for Communicating

Communication is an important component of this plan. Our goal is to ensure we have effective two-way communication with employees, and our system for communicating includes the following:

- **Who employees should report COVID-19 symptoms and possible hazards to: employees have been instructed by written communication, as well as frequent verbal reinforcement at staff meetings, that employees can report symptoms and hazards to their immediate supervisors without fear of reprisal.**
- **Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness to allow for the interactive process.**
- **How employees can access voluntary COVID-19 testing whether through Humboldt County Public Health, employee health plans, and/or local testing centers. The purpose is to give employees easy access to testing when they have symptoms or have been at risk to reduce the likelihood of bringing the virus to work. Voluntary testing is not currently provided by the district.**
- **Written notice, within one business day after receipt of "notice of potential exposure," to all employees and employers of subcontracted employees who were on the premises of the same worksite as the "Qualifying Individual" within the infectious period. The notice is provided in writing via email and contains information regarding COVID-19 related benefits to which the employee may be entitled and the disinfection and safety plan implemented per CDC guidelines.**
- **Written notice to the exclusive representative (CSEA and/or ETA), if any, within one business day. Notice to the exclusive representative of employees entitled to receive written notice includes benefits to which the employees may be entitled, the disinfection and safety plan implemented per**

CDC guidelines, and information normally required in an incident report in a Cal/OSHA Form 300 injury and illness log.

- Notice to the Humboldt County Public Health Department within 48 hours after receipt of “notice of potential exposure” if there is a COVID-19 outbreak (at least three COVID-19 cases among workers at a worksite in a 14-day period).
- In the event the district is required to provide testing because of a workplace exposure or outbreak, a plan for testing will be communicated to those who may have been exposed. Such employees will be informed of the reason for the testing and the possible consequences of a positive test. In this case, the Humboldt County Public Health Department will be contacted to accomplish this testing at no cost to the employee during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks.
- Each school site and work location has a Site Specific Protection Plan (SSPP) which is posted on the Eureka City Schools website by location at www.eurekacityschools.org.

Training and Instruction

We have provided effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

When we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by: Employer provided leaves as agreed to in our collective bargaining agreements and/or workers compensation benefits.
- Providing employees with information on available benefits at the time of exclusion.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace and on the Eureka City Schools website to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

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

Appendix A: Identification of COVID-19 Hazards

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

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

Person conducting the evaluation:

Date:

Name(s) of employee and authorized employee representative that participated:

[illegible]

Appendix B: COVID-19 Inspections

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

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

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

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

Date:

Name of person conducting the investigation:

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location(s) where employee worked (or non-employee was present in the workplace) 14 days prior to a positive test:		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 test:	
Highest number of employees at site 45 days from the last day the employee worked on site :		Date of results:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	

<p>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):</p>	
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Additional questions:

- Where do you think you might have been exposed to COVID-19?
- If an employee thinks they contracted COVID-19 at work ask if they would like to file a Workers' Comp Claim. If yes, please complete an incident report for the employee and have the employee call Company Nurse at 877-518-6702.
- Highest number of employees at site 45 days from the last day the employee worked on site?
- Days off work for COVID reasons (working remotely or off work/sick leave/employee personal necessity)?
- Date released back to work by Public Health (if applicable)?
- Proof of test or doctor's note?

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 the 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:

Person that conducted the training:

[illegible]

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 our workplace for a 14-day period.

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - 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.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.

- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of 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 North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2

Major COVID-19 Outbreaks

[20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]

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

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at the exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we 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, we will use filters with the highest compatible filtering efficiency. We 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.
- 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.
- Evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.