CCS COVID-19 Prevention Program
An Addendum to the Injury and Illness Program

In accordance with TITLE 8, DIVISION 1, CHAPTER 4, Subchapter 7. General Industry Safety Orders Section 3205, COVID-19 Prevention  This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

March 19, 2021

Contents

Authority and Responsibility
J.J. Lewis has the authority and the responsibility for implementing the provisions of this program for the Compass Charter Schools. District Administrators, Department Supervisors, and managers are responsible for implementing and maintaining the CPP in their work areas and for answering worker questions about the CPP.

Definitions
The following definitions apply:

“COVID-19” means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

“COVID-19 case” means a person who:

(1) Has a positive “COVID-19 test” as defined in this section;

(2) Is subject to COVID-19-related order to isolate issued by a local 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.

“COVID-19 exposure” means being within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” defined by this section. This definition applies regardless of the use of face coverings.

“COVID-19 hazard” means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolized saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.
Employee Participation

Employees and their authorized employees’ representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by wearing your mask often, practicing social distancing, and washing hands often.

Employees are to report any hazards to the HRteam@compasscharters.org.

Employee Screening

Our employees are required to self-screen at home, according to CDPH guidelines, before coming to work. If an employee exhibits any of these symptoms, they are to remain at home and contact their supervisor and the Department of Human Resources at HRteam@compasscharters.org.

If an employee feels ill during the workday, they are to immediately notify their supervisor and leave work, and it is highly recommended that they contact their physician.

Control of COVID-19 Hazards

Physical Distancing

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

- Eliminating the need for workers to be in the workplace – e.g. telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including breakrooms, meeting rooms, and to include visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered break times.
- Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

We provide each employee with 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. In addition:

- Employees will be provided with one cloth face mask. Additional disposable face coverings are available upon request from each employee’s immediate supervisor.
Employees are expected to have clean face coverings each day that they enter the building, to reduce the spread of germs.

Should an employee encounter a non-employee without a face covering, the non-employee should be directed to the supervisor to receive a face covering.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

Engineering Controls

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

- Physical barrier installations (partitions) where feasible
- We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:
  - Ensuring our HVAC equipment is serviced.
  - Cleaning and sterilization of all supply and return ducts throughout the building as necessary, using a disinfectant.
  - Advanced notification to employees of HVAC work.

Cleaning and Disinfecting

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

- Cleaning and disinfecting is performed four nights a week either by the Facilities Department or an outside cleaning company, and includes a routine cleaning of offices and common areas, and spot sterilization (bathroom fixtures, door handles, etc.)
- Team performs sterilization of all common areas and bathrooms, ensuring adequate time for the procedure to be accomplished.
- A deep cleaning and disinfection procedure is performed by the Church
- Additional deep cleaning is performed when circumstances dictate

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

- A deep cleaning is performed of potentially contaminated surfaces
- In the event that extensive disinfection is required that exceeds the capabilities of the Church, an outside contractor will be selected and deployed.

Shared Tools, Equipment and Personal Protective Equipment (PPE)

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the employee. The Facilities Department provides approved disinfectant solutions and supplies for department and employee use.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example,
steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users.

**Hand Sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Encourage employees to wash their hands for at least 20 seconds each time, with warm water.
- Hand sanitizing stations are provided at the entrance at each location, and in additional locations throughout each building.
- Handwashing facilities are available in the restrooms for all locations.

**Personal Protective Equipment (PPE) Used to Control Employees’ Exposure to COVID-19**

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

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

We provide and ensure the use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolized potentially infectious material such as saliva or respiratory tract fluids.

**Investigating and Responding to COVID-19 Cases**

This will be accomplished by using **Appendix C: Investigating and Responding to COVID-19 Cases**. Employees who had potential COVID-19 exposure in our workplace receive the following:

- Notification of possible exposure, which contains information regarding locations of free testing sites.
- Testing to be performed during employee’s working hours
- Mileage reimbursement available

**System for Communicating**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Employees shall immediately report Covid-19 symptoms and possible hazards to their supervisor or Human Resources.
- The employee is advised to stay home and self-quarantine for 14 days and symptoms resolve.
- Employees report symptoms or positive test results to hrteam@compasscharters.org
- Employees can report symptoms and hazards without fear of reprisal.
- Workplace hazards associated with COVID-19 can be reported directly to the HR Dept. at: hrteam@compasscharters.org
- Our procedures or policies for accommodating employees with medical or other conditions put them at increased risk of severe COVID-19 illness.
- Employees can access COVID-19 testing by notifying their personal physician, or through local testing centers.
In the event CCS is required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet 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 handwashing 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.

COVID-19 training records, for all required training, are maintained by the Department of Human Resources and are referenced in Appendix D.

Exclusion of COVID-19 Cases

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 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.
- Information on employee benefits is available through Human Resources at hrteam@compasscharters.org.

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 information about all COVID-19 cases at our workplace to our Worker’s Compensation carrier.
● Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
● Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
● Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.

Use **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 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 has 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.

“COVID-19 symptoms” means the following unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

● fever of 100.4 degrees Fahrenheit or higher
● chills
● cough
● shortness of breath or difficulty breathing
● fatigue
● muscle or body aches
● headache
● new loss of taste or smell
● sore throat
● congestion or runny nose
● nausea or vomiting, or diarrhea,

“COVID-19 test” means a viral test for SARS-CoV-2 that is:

1. Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and
2. Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as
“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break, or eating areas, and waiting areas. The exposed workplace does not include buildings or facilities not entered by a COVID-19 case.

Effective January 1, 2021, the "exposed workplace" also includes but is not limited to the "worksite" of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

“High-risk exposure period” means the following time period:

(1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 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 persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.

Identification and evaluation of COVID-19 hazards

We will implement the following in our workplace:

- Employee and authorized employee representative participation in the identification and evaluation of COVID-19 hazards.
- A process for screening employees for and responding to employees with COVID-19 symptoms.

CCS may ask employees to evaluate their own symptoms before reporting to work. If CCS conducts screening at the workplace, CCS shall ensure that face coverings are used during screening by both screeners and employees and, if temperatures are measured, that non-contact thermometers are used.

- All employees must complete a symptom screening questionnaire via google form each morning upon arrival
- Employees may use a touchless thermometer upon entry to the worksite or take their temperature prior to coming to work.
- Employees showing symptoms will be asked to return home or stay home and enter the decision tree protocol.

COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission of COVID-19 in the workplace.

Conduct a workplace-specific identification of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

CCS shall treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious, including:

- Identification of places and times when people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, for instance during meetings or trainings and including in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.
An evaluation of employees’ potential workplace exposure 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. CCSs shall consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

For indoor locations, evaluate how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.

Review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to Compass Charter School’s industry, location, and operations.

Evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.

2. Evaluate employees’ potential workplace exposures to all persons at, or who may enter, our workplace.
4. Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
5. 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.

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:

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, by reporting to the site administrator. The site administrator is responsible for rectifying the concern and/or referring it to the appropriate department leader.

Control of COVID-19 Hazards

Physical distancing

All employees will be separated from other persons by at least six feet (except where it can be demonstrated that six feet of separation is not possible, and except for momentary exposure while persons are in movement)

Methods of physical distancing include:

- Telework or other remote work arrangements, where feasible
- Reducing the number of persons in an area at one time, including visitors
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel
- Staggered arrival, departure, work, and break times
- Adjusted work processes or procedures, to allow greater distance between employees
- Teacher workspaces delineated by a 6+ foot “bubble” allowing them space between them and scholars.
- On shared table spaces, there is plexiglass in place

**Face coverings**
We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. We will:

- Comply with all public health orders regarding face coverings
- Provide face coverings to all employees as needed
- Ensure they are worn by employees over the nose and mouth when;
  - indoors,
  - when outdoors and less than six feet away from another person,
  - and where required by orders from the CDPH or local health department.
- Ensure face coverings are clean and undamaged.
- Ensure face shields are not used as a replacement for face coverings, although they may be worn together for additional protection.

The following are exceptions to the face coverings requirement:
1. When an employee is alone in a room.
2. While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible. 3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders.
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing impaired person. 5. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

*NOTE: CDPH has issued guidance for CCSs that identifies examples when wearing a face covering is likely not feasible.*

- Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non- restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
- Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19. COVID-19 testing cannot be used as an alternative to face coverings when face coverings are otherwise required.
- CCS will not prevent any employee from wearing a face covering when required, unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- CCS will implement the following measures to communicate to non-employees the face coverings requirements on their premises:
  - Signage in each school and workspace at the entrance.
  - Reinforced in all school reopening documents

**Testing Cadences**
CCS employees are required to participate in surveillance testing once every 60 days. Employees are required to provide negative results to their supervisor. CCS will implement symptom and exposure screening based on CDPH recommendations:

Each tier features cadence on the testing performed for both staff and scholars which varies in cadence around testing purpose and frequency.

<table>
<thead>
<tr>
<th>County Tier</th>
<th>Staff Testing Cadence</th>
<th>Students K-12 Testing Cadence</th>
</tr>
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<tbody>
<tr>
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<td>Symptomatic* and response testing</td>
<td>Symptomatic* and response testing</td>
</tr>
<tr>
<td>Orange</td>
<td>Symptomatic* and response testing</td>
<td>Symptomatic* and response testing</td>
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<tr>
<td>Red</td>
<td>Symptomatic* and response testing + Every 2 weeks asymptomatic testing</td>
<td>Symptomatic* and response testing + Every 2 weeks asymptomatic testing</td>
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<tr>
<td>Purple</td>
<td>Symptomatic* and response testing + Every 2 weeks asymptomatic testing</td>
<td>Symptomatic* and response testing + Every 2 weeks asymptomatic testing</td>
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<tr>
<td>CRP14</td>
<td>Symptomatic* and response testing + Weekly asymptomatic (PCR or twice weekly antigen)**</td>
<td>Symptomatic* and response testing + Weekly asymptomatic (PCR or twice weekly antigen)**</td>
</tr>
</tbody>
</table>

CCS will also test staff when there are multiple COVID-19 cases or major outbreaks based on Cal/OSHA requirements:

- All exposed employees shall be tested immediately and once per week thereafter when three or more COVID-19 cases in an exposed workplace within a 14-day period
- If there are twenty or more COVID-19 cases in an exposed workplace within a 30-day period, then all exposed employees will be tested twice per week, or more frequently if recommended by the San Diego County Department of Health

**Engineering and Administrative Controls**

**Partitions**
At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the District will install cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.

**Maximize Outdoor Air**
For buildings with mechanical or natural ventilation, or both, the District will maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

**Cleaning and Disinfecting**
The District has implemented cleaning and disinfecting procedures, which require:

- Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The District will inform employees and authorized employee representatives of cleaning and disinfection protocols,
including the planned frequency and scope of regular cleaning and disinfection.

- Prohibiting the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing shall be minimized and such items and equipment shall be disinfected between uses by different people.
- Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high risk exposure period.

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

- Scholar/staff is sent home if not already quarantined:
- Scholar/staff is instructed to isolate for 10 days after symptom onset, 24 hours fever free without fever medication and symptoms have improved If never symptomatic, isolate for 10 days after the date of positive test.
- School-based close contacts identified and recommend to test & quarantine for 14 days from last date of exposure to positive individual
  - In stable elementary classroom stable groups: identified close contacts
  - In other settings: use seating chart, consult with teacher/staff
- School administration, District Nurse and scholar Services notified
- Public Health Department notified

Closing off areas used by any sick person and do not use room before cleaning/disinfecting:

- To reduce risk of exposure, waiting 24 hours before cleaning/disinfecting, but if it’s not possible, waiting as long as practicable
- Ensuring a safe and correct application of disinfectants as trained using PPE and ventilation recommended for cleaning
- Keeping disinfecting product from scholars

**Handwashing Facilities**

To protect employees from COVID-19 hazards, the District will evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. CCSs shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.

**Personal Protective Equipment**

1. The District will evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.
2. The District will evaluate the need for respiratory protection in accordance with section 5144 when the physical distancing requirements are not feasible or are not maintained.
3. The District will provide and ensure use of respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to Take Special Action, in accordance with title 8 section 332.3.
4. The District will provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolized potentially infectious material such as saliva or respiratory tract fluids.
Investigating and responding to COVID-19 cases in the workplace

This will be accomplished by using the Appendix C: Investigating COVID-19 Cases form. Employees who had potential COVID-19 exposure in our workplace will be:

Procedure to investigate COVID-19 cases in the workplace include:

- A thorough tracing protocol and provides free COVID testing twice a month to all staff. [https://covid19.ca.gov/get-tested/](https://covid19.ca.gov/get-tested/)
- Frequent communication with the county public health department.

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to your immediate supervisor(s), co-coordinators
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
- Determine who may have had a COVID-19 exposure. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the high-risk exposure period.
- Give notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
  - All employees who may have had COVID-19 exposure and their authorized representatives.
  - Independent contractors and other CCSs present at the workplace during the high risk exposure period.
  - Offer COVID-19 testing at no cost to employees during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with the information on benefits described in subsections (c)(5)(B) and (c)(10)(C).

Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards. Each case is investigated by school and District staff to determine protocols and potential improvements.

Information about COVID-19 hazards employees (including other employers and individuals in contact
with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

All personally identifying information regarding COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by CCS under this section and sections 3205.1 through 3205.4 shall be provided in a manner that ensures the confidentiality of employees.

- All Employee medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace. (Unredacted medical records shall be provided to the local health department, CDPH, the Division, NIOSH, or as otherwise required by law immediately upon request and does not apply to records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed).

**Training And Instruction**

CCS will provide effective training and instruction that includes:

- The CCS’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. This includes any benefits available under workers’ compensation law, the federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the CCS’s own leave policies, and leave guaranteed by contract.
- The fact that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that 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.
- COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.

**Exclusion of COVID-19 cases**

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

- Ensure that COVID-19 cases are excluded from the workplace until the return to work requirements in section 11 are met.
- Exclude employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
For employees excluded from work and otherwise able and available to work, the District will continue and maintain the employee’s earnings, seniority, and all other employee rights and benefits, including the employee’s right to their former job status, as if the employee had not been removed from their job.

The District may use CCS-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers’ compensation.

This section does not limit any other applicable law, CCS policy, or collective bargaining agreement that provides for greater protections.

At the time of exclusion, the District will provide the employee the information on available benefits and leaves as required.

**Reporting, recordkeeping, and access**

It is our policy to:

- Report information about COVID-19 cases at the workplace to the local health department whenever required by law, and shall provide any related information requested by the local health department.
- Report immediately to the Division any COVID-19-related serious illnesses or death, as defined under section 330(h), of an employee occurring in a place of employment or in connection with any employment.
- Maintain records of the steps taken to implement the written COVID-19 Prevention Program in accordance with section 3203(b).
- Make available at the workplace, the written COVID-19 Prevention Program to employees, authorized employee representatives, and to representatives of the Division immediately upon request.
- Keep a record of and track all COVID-19 cases with 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. Medical information shall be kept confidential, and made available only to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.
- This does not alter the right of employees or their representatives to request and obtain an CCS’s Log of Work-Related Injuries and Illnesses (Log 300), without redaction, or to request and obtain information as otherwise allowed by law.

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 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.

In the Case of Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP is only applicable if a workplace in the district is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in a workplace within a 14-day period. This section will stay in effect until there are no new COVID-19 cases detected in the affected 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.

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.

In the Case of Major COVID-19 Outbreak

This section of CPP is only applicable if a workplace in the district experiences 20 or more COVID-19 cases within a 30-day period. This section will stay in effect until there are no new COVID-19 cases detected in the affected 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.

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.
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 Employees and Authorized Employee Representative that Participated:
- 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 CCSs
- Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
Appendix B: COVID-19 Inspections

Date:

- Name of Person Conducting the Inspection:
- Work Location Evaluated:
- Exposure Controls Status Person Assigned to Correct Date Corrected Engineering:
- Barriers/Partitions:
- Ventilation (amount of fresh air and filtration maximized):
- Additional room air filtration:
- Exposure Controls Status Person Assigned to Correct Date Corrected 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:
- Exposure Controls Status Person Assigned to Correct Date Corrected:
- PPE (not shared, available and being worn):
- Face coverings (cleaned sufficiently often):
- 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/scholars, 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:
- Location where employee worked (or non-employee was present in the workplace):
- Was COVID-19 test offered?
- Date and time the COVID-19 case was last present in the workplace:
- Occupation (if non-employee, why they were in the workplace):
- Date investigation was initiated:
- Name(s) of staff involved in the investigation:
- 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.
- Independent contractors and other CCSs present at the workplace during the high-risk exposure period.
- What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
- Date:
- Names of employees that were notified:
- Date:
- Names of individuals that were notified:
- What could be done to reduce exposure to COVID-19?
- Was local health department notified?
- Date:

*Should an CCS be made aware of a non-employee infection source COVID-19 status.
Appendix D: COVID-19 Training Roster

All OCLC staff have completed OSHA and SafeSchools trainings, and using disinfectant training under The Healthy Schools Act

Coronavirus Awareness

Coronavirus - CDC Guidelines for Making & Using Cloth Face Covering

Coronavirus - Cleaning & Disinfecting Your Workplace

Coronavirus - Reopening your organization (Supervisors only)

OSHA