

OCEAN VIEW SCHOOL DISTRICT

COVID-19 Prevention Program (CPP)

January 29, 2021

This COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. The protocols outlined in this CPP are intended to supplement existing District policies and procedures, applicable collective bargaining agreements and memoranda of understanding with exclusive bargaining representatives, and relevant requirements imposed by state and local health agencies. It is applicable during the current COVID-19 public health emergency.

I. Authority and Responsibility

- A. Michael Conroy, Ed.D., Deputy Superintendent and Felix Avila, Assistant Superintendent, Human Resources 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 responding to questions by employees about the CPP.

II. Identification and Evaluation of COVID-19 Hazards

A. Workplace Hazards

The following will be implemented in the workplace as needed to address potential COVID-19 hazards in accordance with applicable collective bargaining agreements and memoranda of understanding with exclusive bargaining representatives:

1. Assessment of workplace-specific exposure to persons at, or who may enter, the District sites.
2. Evaluation of existing COVID-19 prevention controls and the need for different or additional controls.
3. Implementation of periodic inspections as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with current COVID-19 orders and directives from the California Department of Health, Cal/OSHA, and local health departments.

B. Employee Self-Screening

1. Employees will be required to undergo temperature screening before entering District sites.
2. Employees will be required to self-screen and to comply with District policies, applicable collective bargaining agreements, applicable memoranda of understanding between the District and appropriate exclusive bargaining representatives, and the latest local public health directives to mitigate coronavirus risk to themselves and anyone visiting the work site. To this end, employees must evaluate their own symptoms before reporting to work, and must immediately report any symptoms of COVID-19 they experience whether the symptoms developed at

work or elsewhere. Prior to reporting to work, employees must self-screen for COVID-19 symptoms and risk factors by asking themselves the following questions:

- (a) Have I had any signs or symptoms of a fever in the past 24 hours such as chills, sweats, felt "feverish" or had a temperature that is elevated for me/100.4°F or greater?
 - (b) Do I currently have (or, in the last 24 hours, have I had) any of the following symptoms?
 - Cough
 - Trouble breathing, shortness of breath or severe wheezing
 - Sore Throat
 - Nasal Congestion/Runny Nose
 - Myalgia (Body/Muscle Aches)
 - New loss of taste and/or smell, or a change in taste
 - Diarrhea
 - Nausea
 - Vomiting
 - Fever of 100.4 F or above, or possible fever symptoms like alternating chills and sweating
 - Chills or repeated shaking with chills
 - Headache
 - (c) Within the last 14 days, have I been in contact with someone with a confirmed diagnosis of COVID-19?
 - (d) Do I currently have any of the following possible emergency symptoms?
 - Struggling to breathe or fighting for breath even while inactive or when resting?
 - Feeling about to collapse every time you stand or sit up?
3. If your response is yes to any of the above questions, do not report to work and immediately contact your direct supervisor, your manager, and/or Human Resources. Employees must also promptly disclose positive COVID-19 test results.
 4. If an employee starts feeling sick and/or experiencing symptoms of illness associated with the COVID-19 virus during the work day, the employee is required to:
 - (a) Immediately report the symptoms to your supervisor and/or to Human Resources.
 - (b) Your supervisor and/or Human Resources will direct you to leave work.
 - (c) Avoid close contact with other employees while at and when leaving the workplace.
 5. Employees must cooperate with the District in any investigation related to the onset of illness, date of symptoms, others with whom the employee had close contact, and

coronavirus testing among other topics. The investigation will help the District identify employees who may have been exposed and quarantine them so there is no further workplace exposure.

III. Control of COVID-19 Hazards

The District will implement reasonable guidelines to mitigate employee exposure to the coronavirus in the workplace as follows:

A. Physical Distancing

1. Ensuring where feasible at least six feet of physical distancing at all times in our workplace by:
 - (a) Reducing the number of persons in an area at one time, including visitors.
 - (b) Visual cues such as signs and floor markings to indicate where employees distancing
 - (c) Staggered arrival, departure, work, and break times.
 - (d) Plexiglass partition between office spaces
2. Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

B. Face Coverings

1. Providing 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.
2. Employees must wear face coverings at all times while at the workplace. The following are exceptions to the use of face coverings in our workplace:
 - (a) When an employee is alone in a room.
 - (b) 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.
 - (c) 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.
 - (d) Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

C. Engineering Controls

Maximizing, to the extent reasonable, the quantity of outside air for District buildings with mechanical or natural ventilation systems.

D. Cleaning and Disinfecting

1. Assigning personnel and establishing routine schedules to clean and disinfect common areas and frequently touched surfaces and objects in the workplace. This includes, but is not limited to, copying machines, containers, counters, tables, desks, chairs, benches, door handles, knobs, handrails, controls, restroom and bathroom surfaces, elevator buttons, equipment, tools, steering wheels, and trash cans.

Disinfecting includes providing disinfecting products that are EPA approved for use against the virus that causes COVID-19 and follows the manufacturer's instructions for all cleaning and disinfection products (for example, safety requirements, PPE, concentration, and contact time).

2. Implementing the following procedures should a COVID-19 case occur in the workplace:
 - (a) Temporarily closing the general area where the infected employee or guest worked or visited until cleaning has been completed.
 - (b) Conducting deep cleaning of the entire general area where the infected employee worked and may have been, including break rooms, restrooms, and travel areas, as well as any materials and equipment used during the high-risk exposure, with a cleaning agent approved for use by the EPA against the coronavirus.
 - (c) Ensuring that custodial personnel cleaning the area are equipped with proper personal protective equipment for COVID-19 disinfection (disposable gowns, gloves, eye protection, or masks if required).

E. Shared Tools, Equipment and Personal Protective Equipment (PPE)

1. Limiting, to the extent reasonable, the sharing of tools, equipment, and personal protective equipment (PPE) as follows:
 - (a) Where there must be sharing, the items will be disinfected between uses by District employees who have been trained to use a disinfectant and proper PPE.
 - (b) PPE must not be shared, e.g., gloves, goggles, and face shields. In addition, to the extent reasonably possible, 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.
 - (c) Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

F. **Hand Sanitizing**

1. Implementing reasonably effective hand sanitizing procedures, including:
 - (a) Providing employees time for handwashing for at least 20 seconds each time.
 - (b) Providing employees with an effective hand sanitizer that will not contain methynol (i.e., methyl alcohol).

G. **Personal Protective Equipment (PPE) Used to Control Employees' Exposure to COVID-19**

Evaluating the need for PPE (such as gloves, gowns, face coverings, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed. This will include respiratory protection determined to be appropriate in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained, as well as eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

IV. Investigating and Responding to COVID-19 Cases

A. **Investigation Procedures**

1. The District will implement effective procedures to investigate COVID-19 cases in the workplace, including procedures for verifying COVID-19 case status, receiving information regarding COVID-19 test results and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases.
2. Where there has been a COVID-19 case at a District worksite, and in the event there is a COVID-19 outbreak and/or a major outbreak, the District will take the following actions:
 - (a) 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.
 - (b) 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.
 - (c) 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 all employees who may have had COVID-19 exposure and their authorized representatives, and independent contractors and other employers present at the workplace during the high-risk exposure period.
 - (d) 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.

- (e) 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.

B. Confidentiality of Investigation

1. 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.
2. 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.

V. System for Communicating

- A. The District will implement a communication system with employees on matters relating to COVID-19 mitigation and response to ensure employees' safety in the workplace. This will include a clear and concise exchange of information between the District and employees by providing a single point of contact for managers and supervisors.
- B. District employees will be encouraged to freely communicate with their supervisors and managers concerning COVID-19 symptoms, possible COVID-19 exposures, possible COVID-19 workplace concerns and hazards, and suggestions for correction of potential hazards without fear of reprisal.
- C. District employees will be asked to report to their immediate manager or supervisor concerns regarding COVID-19 mitigation practices or possible COVID-19 exposure in the workplace without fear of reprisal.
- D. Managers and supervisors who, after assessing the concern, determine that additional guidance or assistance is required shall contact the Coordinator of Student Services or the Assistant Superintendent of Human Resources who will triage the report and notify essential personnel for an appropriate response.
- E. Employees with a disability, medical or other condition that places them at increased risk of severe COVID-19 illness and an accommodation is needed, will be encouraged to report it to their supervisor or manager without fear of reprisal. The District will engage in the interactive process by evaluating the request and determining, with input from the employee and their health care provider, whether the employee can be accommodated and what reasonable accommodations will be offered.

- F. When required by law, the District will provide COVID-19 testing to potentially exposed employees.
 - 1. If testing is required by law, employees will be informed of the reason for COVID-19 testing and the possible consequences of a positive test.

VI. Training and Instruction

- A. The District will offer training and instruction that includes:
 - 1. Providing information on policies and procedures, and memoranda of understanding with appropriate exclusive bargaining representatives on COVID-19 hazards impacting employees.
 - 2. Providing information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and memoranda of understanding between the District and appropriate exclusive bargaining representatives.
 - 3. Providing information concerning the contagious nature of COVID-19 including:
 - (a) COVID-19 is an infectious disease that can be spread through the air.
 - (b) COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - (c) An infectious person may have no symptoms.
 - 4. Providing information on the methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of facecoverings.
 - 5. Providing information on 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.
 - 6. Providing information on 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.
 - 7. Providing information on the 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.
 - 8. Providing information on COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

VII. Exclusion of COVID-19 Cases

- A. Where there is a COVID-19 case at a District site, the District will limit transmission by:
 - 1. Ensuring that COVID-19 cases are excluded from the workplace until all return-to-work requirements are met.

2. Excluding employees with COVID-19 exposure from the workplace for a maximum of 14 days after the last known COVID-19 exposure to a COVID-19 case.
3. Continuing and maintaining an 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, unless the District demonstrates that the COVID-19 exposure is not work-related. This will be accomplished by individual conversations with employees who have been exposed in the workplace to discuss leave options covered by the district, possible options to work remotely, and possible temporarily reassignment to work where they do not have contact with other persons until the return to work requirement is met. This conversation will determine all leave options to support employees during exclusion due to COVID-19. Excluded employee may not be entitled to continued earnings, rights, and benefits, if the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19 transmission. Employees will be required to use available sick leave when excluded from the workplace due to COVID-19.
4. Providing employees at the time of exclusion with information on available benefits.

VIII. Reporting, Recordkeeping, and Access

- A. The District will implement reporting and recordkeeping procedures as follows:
 1. 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.
 2. 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.
 3. Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
 4. 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.
 5. Use the **Appendix A: 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.

IX. Return-to-Work Criteria

- A. The District will apply the following return-to-work criteria:
 1. Employees with COVID-19 symptoms will not return to work until all the following have occurred:
 - (a) At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - (b) COVID-19 symptoms have improved.

- (c) At least 10 days have passed since COVID-19 symptoms first appeared.
- 2. Employees 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.
- 3. A negative COVID-19 test will not be required for an employee to return to work.
- 4. 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.

X. Multiple COVID-19 Infections and COVID-19 Outbreaks

- A. The District will adhere to the following policies and practices should the workplace experience a COVID-19 outbreak or major outbreak. A COVID-19 outbreak is defined as 3 or more cases of COVID-19 in a 14 day period. A major COVID-19 outbreak is defined as 20 or more cases of COVID-19 in a 30 day period.
- B. The District will provide the legally mandated COVID-19 testing to all exposed employees in the workplace except those who were not present during the period of an outbreak. The testing will be provided at no cost to the employees and will occur during working hours.
- C. All employees will be tested as frequently as required for a COVID-19 outbreak or a major COVID-19 outbreak. Additional testing will be provided when deemed necessary by Cal/OSHA.
 - 1. In the event there is a COVID-19 outbreak, all employees at the exposed workplace shall be tested and then tested again one week later. After the first two COVID-19 tests, the District will provide continuous 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.
 - 2. In the event there is a Major COVID-19 outbreak, the District 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.
- D. The District will quarantine and exclude all COVID-19 cases and those exposed to the COVID-19 cases as set forth above.
- E. The District will immediately investigate and determine possible COVID-19 hazards that may have contributed to the outbreak in accordance with "Identification, Evaluation, and Correction of COVID-19 Hazards" and "Investigation and Responding to COVID-19 Cases."
- F. The District will perform a review of its COVID-19 policies, procedures, and controls and implement changes and corrections where needed. This review will be updated every 30 days that the outbreak continues, in response to new information or to new or previously unrecognized COVID-19 hazards. The investigation and review will be documented and include review of:
 - 1. Leave policies and practices to insure employees are encouraged to remain home when sick;
 - 2. COVID-19 testing process;

3. Sufficiency of outdoor air circulation and air filtration;
4. Sufficiency of physical distancing, face coverings or use of other PPE;
5. The need to move indoor tasks outdoors or having them performed remotely.

G. In the event of a major outbreak, review will include:

1. The mechanical ventilation, and, if possible, filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the system. We will evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other cleaning systems would reduce the risk of transmission.
2. The need for additional respiratory protection.
3. Whether to halt some or all operations until the COVID-19 hazard has been corrected.
4. Implement any other control measures as required by Cal/OSHA.

Appendix A: Investigating COVID-19 Cases

Date: [enter date]

Name of person conducting the investigation: [enter name(s)]

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 (attached 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: