



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

**Effective Date: November 30, 2020**

### **AUTHORITY AND RESPONSIBILITY**

**Kathy Dahlgren, Principal/Superintendent** 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by reviewing procedures and observing practices, reporting on discrepancies between the two, and suggesting improvements to either to better mitigate any hazards.

### **EMPLOYEE SCREENING**

We screen our employees by requiring self-screening daily prior to coming to the work site.

### **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.

At least monthly, the Facilities Team will inspect the worksite for unsafe or unhealthy work conditions. This

inspection will be documented using the form in Appendix B. Hazard severity will be assessed by the inspection team and the action plan for correction reported to the Principal/Superintendent. The inspection team will continue to report status to the Principal/Superintendent daily until all actions are satisfactorily corrected.

## **CONTROL OF COVID-19 HAZARDS**

### **PHYSICAL DISTANCING**

We strive for six feet of physical distancing at all times in our workplace by reducing the number of students in classrooms by providing distance learning options, encouraging work-from-home for non-instructional employees, placing visual cues such as sit spots and stickers to indicate appropriate spacing, arranging students in cohorts to limit exposure, staggering arrival and departure times as well as entry locations, and eliminating parents and non-essential volunteers in our workplace.

Individuals will be kept at least four feet apart when there are situations where six feet of physical distancing cannot be achieved.

### **FACE COVERINGS**

For maximum comfort, we encourage students and staff to provide their own face coverings. When necessary we provide clean, undamaged face coverings. We ensure face coverings are properly worn by employees and students 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 entrances are clearly marked with a sign stating face coverings are required in the workplace. Should someone be observed not wearing a face covering as required they should be reminded of this requirement. If they refuse to comply, they should be referred to the Principal/Superintendent.

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 wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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.

### **ENGINEERING CONTROLS**

We provide solid Plexiglas partitions for situations where we cannot maintain at least six feet between individuals.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by windows that open, HVAC optimizers and increased outside air gap in HVAC air handlers combined with higher MERV rated filters (MERV11 or better) and stand-alone HEPA air purifiers.

Heat, cold, and smoke may periodically make outside air maximization impractical. In these circumstances, the use of the stand-alone HEPA filters is crucial. A schedule for the replacement of HEPA filters and HVAC filters shall be determined and adhered to.

## **CLEANING AND DISINFECTING**

We purchased large quantities of cleaning and disinfecting supplies to ensure availability during the school year. All frequently touched surfaces are cleaned and disinfected daily. All employees are instructed on the appropriate use of cleaning and disinfecting supplies.

Should we have a confirmed COVID-19 case in our workplace, we will close off the indoor areas occupied by the infected person. The indoor areas will be ventilated by opening windows and doors and HEPA filtration will be run for as long as practicable. Following ventilation and filtration, custodial staff will clean and disinfect the area prior to reopening. During cleaning, custodial staff will be gloved, masked, and use proper disinfecting procedures.

### **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 person arriving at a workstation with shared items is responsible for wiping down those items with an 70% alcohol-based wipe prior to use.

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.

### **HAND SANITIZING**

In order to implement effective hand sanitizing procedures, we installed outdoor handwashing stations in several areas across campus. Each handwashing station is supplied with soap, paper towels, and hand sanitizer. Additionally, there are handwashing sinks in each classroom and work area. These sinks are also supplied with soap, paper towels, and hand sanitizer. Adequate time is allowed for all staff and students to wash their hands for at least 20 seconds.

Hand sanitizer containing methanol or methyl alcohol are prohibited.

### **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.

## **INVESTIGATING AND RESPONDING TO COVID-19 CASES**

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 provided with a list of testing locations and COVID-19 testing will be offered at no cost during their working hours.

## **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 should report symptoms to Kathy Dahlgren, Principal. Employees should report symptoms remotely (telephone or text preferred) to decrease risk of exposure to others.
- Employees can report symptoms and hazards without fear of reprisal.
- Where testing is not required, employees can access information on local COVID-19 testing sites upon request.
- 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.

- Our COVID-19 policies and procedures are communicated to staff through dissemination of written materials, in staff trainings, and in reminders during the work day.
- Studies reveal a significantly lower incidence rate for COVID-19 among younger children. Older students and other staff members present the most significant COVID-19 hazard on campus. Strict adherence to multiple mitigation strategies (cleaning/disinfecting, hand washing, universal masking) will minimize these hazards.

## **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 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**

Where 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 our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 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 providing remote work responsibilities at the same rate of pay and with the same number of hours per week.
- Providing employees at the time of exclusion with information on available benefits.

## **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 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 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 EVENT OF MULTIPLE COVID-19 INFECTIONS AND COVID-19 OUTBREAKS**

This section of CPP will go into effect if our workplace 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 our workplace within a 14-day period and 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.

## **IN THE EVENT OF MAJOR COVID-19 OUTBREAKS**

This section of CPP will go into effect should our workplace experience 20 or more COVID-19 cases within a 30-day period and 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 our 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.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will 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**.

## **COVID-19 Prevention in School-Provided Transportation**

### **ASSIGNMENT OF TRANSPORTATION**

We will prioritize shared transportation assignments in the following order:

- Students residing in the same housing unit will be transported in the same vehicle.
- Students in the same cohort will be transported in the same vehicle.
- Students who do not share the same household or cohort will be transported in the same vehicle only when no other transportation alternatives are possible.

### **PHYSICAL DISTANCING AND FACE COVERINGS**

We will ensure that the:

- Physical distancing and face covering requirements of our CPP **Physical Distancing** and **Face Coverings** are followed for students waiting for transportation.
- Vehicle operator and any passengers are separated by at least three feet in all directions during the operation of the vehicle, regardless of the vehicle's normal capacity. Vehicle operator and any passengers are provided and wear a face covering in the vehicle as required by our CPP **Face Coverings**.

### **SCREENING**

We will develop, implement, and maintain effective procedures for screening and excluding drivers and riders with COVID-19 symptoms prior to boarding shared transportation.

## **CLEANING AND DISINFECTING**

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

## **VENTILATION**

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

## **HAND HYGIENE**

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.

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**Kathy Dahlgren, Principal/Superintendent**





**APPENDIX B: COVID-19 INSPECTIONS**

Date: \_\_\_\_\_ Name of person(s) conducting the inspection: \_\_\_\_\_

Work location evaluated: NORD COUNTRY SCHOOL

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
Physical distancing - sit spots/stickers in place			
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:** \_\_\_\_\_

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

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

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

