

Paradise Unified School District COVID-19 Prevention Program (CPP) for August 2021



This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

Date: August 23, 2021

Authority and Responsibility

Tom Taylor, 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 implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees using a Google Sheet which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop 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 in the workplace. When a case is reported
 - Employee is sent home
 - Contact tracing begins (following CDPH and CDC guidelines)
 - Evaluate Workplace Hazards and Mitigate
- 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 and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Participating with the Site Administrator in conducting the workplace-specific evaluations in Appendix A.**

Employee screening

We screen our employees and respond to those with COVID-19 symptoms by: All employees are directed to do a self-screening each day. The following is the Guidelines that are outlined in the PUSD Return to Work Area Plan and the IIPP:

Guidelines for Daily Wellness Checks

- Employees will complete a daily self-assessment wellness check prior to reporting to work. A checklist will be provided.
- Employees are requested to take their temperature before heading to work; do not come to work if the temperature is 100.4 degrees or higher. Stay home.
- Touch-less thermometers will be available at worksites for self-use.
- Any employee who displays signs of illness, shall report this directly to their immediate supervisor.
- Signage will be prominently displayed reminding employees of wellness protocols.
- No congregating at entrances/exits.
- Initially, only identified entrances will be utilized.
- Breaks and lunch periods may be staggered when possible
- Sites should attempt to eliminate heavy traffic areas during busy timeframes and consider staggering times

Correction of COVID-19 Hazards

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

The severity of the hazard will be assigned an alert level between 1-3. Assigning of a 1 would indicate it is the highest level of hazard. Level one would be assigned when the incident is tied to a case in which a person was identified with COVID-19. Level 2 would be assigned if the incident involved an individual who had close contact with a person who had been identified as positive. Level 3 would be an adjustment to general procedures. All of the time lines listed below would be based on best efforts and may be delayed due to resources available.

- Level 1 hazards would be addressed within a 24 hour period
- Level 2 hazards would be addressed within a 48 hour period
- Level 3 hazards would be addressed within a 5 day period

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees that are not fully vaccinated when they are indoors or in vehicles, and where required by orders from the California Department of Public Health (CDPH).

- Each employee will be provided a facial covering by PUSD that can be washed. Additional disposable masks are available at each office and inside the classroom
- If an employee is not wearing a mask they will receive a verbal reminder. If this is an ongoing problem a second reminder would be in writing. Additional occurrences would be followed up using the progressive discipline model.

Employees required to wear face coverings in our workplace may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- Employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering or allowed non-restrictive alternative, will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

Engineering controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission by:

- Regular preventative maintenance is completed on all air filtration systems at all sites. All filters are changed monthly. MERV 13 filters are used unless unavailable. If unavailable the next highest filter rating available will be used. If a positive case is identified in the building all filters for that air exchange location are replaced immediately.
- Fresh air flow will be maximized unless air quality conditions does not permit.

Cleaning and disinfecting

Paradise Unified School District will establish routine schedules to clean and disinfect common surfaces and objects in the workplace. This includes, but is not limited to, classroom technology devices, containers, counters, tables, desks, chairs, benches, door handles, knobs, drinking fountains, refrigerators, vending machines, portable restroom and bathroom surfaces, automobiles and buses – inside and out, and trash cans.

The process of disinfecting includes providing disinfecting products, that are EPA approved for use against the virus that causes COVID-19 and following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time.)

Coronaviruses on surfaces and objects naturally die within hours to days. Warmer temperatures and exposure to sunlight will reduce the time the virus survives on surfaces and objects. Normal routine cleaning with soap and water removes germs and dirt from surfaces. It lowers the risk of spreading COVID-19 infection.

Disinfectants kill germs on surfaces after cleaning, that can further lower the risk of spreading infection. Employees will need to follow the district's approved disinfecting products and procedures when using disinfectants.

Disinfecting procedures include:

- Some surfaces only need to be cleaned with soap and water. For example, surfaces and objects that are not frequently touched should be cleaned and do not require additional disinfection.
- Clean and disinfect frequently touched surfaces daily and shared workspaces and work items before and after use.
- Store and use disinfectants in a responsible and appropriate manner according to the label.
- Keep all disinfectants out of the reach of children. Disinfectants should typically not be applied on items used by children, especially any items that children might put in their mouths. Many disinfectants are toxic when swallowed.
- Do not overuse or stockpile disinfectants or other supplies.
- Always wear gloves appropriate for the chemicals being used when you are cleaning and disinfecting. Additional personal protective equipment (PPE) may be needed based on setting and product.
- Areas unoccupied for 7 or more days need only routine cleaning.
- Outdoor areas generally require normal routine cleaning and do not require disinfection.
- Using CDC guidelines, high touch site sanitizing or disinfecting rounds will be made daily in high traffic areas. Schedules for disinfecting will be dynamic and based on the number of people in a building and potential outbreaks. Each classroom and work area will be disinfected daily using an Electrostatic Sprayer.
- All employees may perform limited non-custodial cleaning and sanitizing, such as at the employee's work area or use of shared equipment, e.g., copiers.
- Additional custodial staff remain on site to provide additional cleaning.

- Cleaning supplies and materials are made available in every classroom and work area.
- Should we have a COVID-19 case in our workplace, we will implement the following procedures:
- If an employee goes home because they are sick the building and facility guidelines are followed to disinfect the area/from/office where the person worked, the tools and equipment they prior to use by others.
- If the case is identified as a COVID-19 illness all air exchange filters are immediately replaced with a filter identified with a MERV 10 or higher rating
- When possible rooms are not cleaned for 24 hours.
- All rooms will be completely sanitized and sprayed with an Electrostatic Sprayer using disinfecting agents identified to kill COVID-19.
- Current custodial staff have been trained in the use of chemicals and perform all the cleaning when a COVID-19 case is identified.
- Custodial staff have received training through Keenan Safe Schools on how to properly disinfect when working within a high-risk exposure area.

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. All attempts are made to avoid sharing between staff and/or students. Where there must be sharing, the items will be disinfected between uses by classified and certificated staff. Staff have been provided wipes and spray disinfectant to sanitize shared materials.
- 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. Bus drivers have been trained to disinfect their buses by wiping down high touch areas and using an Electrostatic Sprayer to disinfect all surface areas.

Hand sanitizing

To implement effective hand sanitizing procedures, we:

- Trained employees on the importance of washing hands with soap and water or use of hand sanitizer if soap and water are not readily available.
- Provide hand sanitizers at all entrance and egress points when possible.
- Provide all employees with an effective hand sanitizer

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 section 3380, and provide and ensure use of such PPE as needed.

Upon request, we provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person. **Employees can request a respirator from their direct supervisor.**

We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

We also provide and ensure use of eye and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Testing of symptomatic employees

We make COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated, during employees' paid time.

Investigating and Responding to COVID-19 Cases

We have developed effective procedure to investigate COVID-19 cases that include seeking information

from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using a Google Doc with information from the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

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

- Directed to Optum Serve or Rite Aide for testing.
- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, excluding:
 - Employees who were fully vaccinated before the close contact and do not have symptoms.
 - COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees.
- Written notice within 1 day of your knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers at the worksite during the high-risk exposure period. These notifications must meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c), and in a form readily understandable by employees and can be anticipated to be received by the employee.

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, possible close contacts and hazards to the site administrator.
- All employees can report symptoms and hazards without fear of reprisal.
- Employees who are identified as high risk may participate in the Interactive Process. This would begin with a doctor's note.
- Employees who have access to multiple free testing sites. PUSD works closely with Optum Serve and Rite Aide. When not required employees can access both programs. 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. If this occurs employees will be directed to Optum Serve or Rite Aide for testing. While waiting for test results the employee will be on leave if they have been identified as a close contact.
- Employees have been trained through Keenan Safe Schools to assist in looking for hazards.
- When an employee or student has tested positive letters are sent to the entire staff and student cohort that may have been impacted.
- Classified and Certificated Presidents will meet weekly with the superintendent to discuss matters and resolve any issues.
- Classified and Certificated Presidents are notified of all cases within the district.

Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - The conditions where face coverings must be worn at the workplace.
 - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

Tracking of training has been done through the Keenan Safe Schools training programs in place of Appendix D: COVID-19 Training Roster.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by following the "2021 COVID-19 Supplemental Paid Sick Leave," through September 30,
- 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the localhealth department.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program inaccordance with section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorizedemployee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use a Google Doc with information from **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19cases.

Return-to-Work Criteria

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use offever-reducing medications, and
 - COVID-19 symptoms have improved, and
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- **COVID-19 cases who tested positive but never developed symptoms** will not return to work until aminimum of 10 days have passed since the date of specimen collection of their first positive COVID-19test.
- A negative COVID-19 test will not be required for an employee to return to work once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) havebeen met.
- Persons who had a close contact may return to work as follows:
 - Close contact but never developed symptoms: when 10 days have passed since the last knownclose contact.
 - Close contact with symptoms: when the “cases with symptoms” criteria (above) have been met,unless the following are true:
 - The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19
 - test with specimen taken after the onset of symptoms; and
 - At least 10 days have passed since the last known close contact, and
 - The person has been symptom-free for at least 24 hours, without using fever-reducingmedications.
- If an order to isolate, quarantine, or exclude 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.

Tom Taylor, Superintendent

Date

Appendix B: COVID-19 Inspections

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration*			
Administrative			
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			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles when approved			
Respiratory protection			

*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We 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 maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/

OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date: [enter date COVID-19 case – suspected/confirmed - became known to the employer]

Name of person conducting the investigation: [enter name]

Name of COVID-19 case (employee or non-employee*) and contact information: [enter information]

Occupation (if non-employee*, why they were in the workplace): [enter information]

*If we are made aware of a non-employee COVID-19 case in our workplace

Names of employees/representatives involved in the investigation: [enter information]

Date investigation was initiated: [enter information]

Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed: [enter information]

Date and time the COVID-19 case was last present and excluded from the workplace: [enter information]

Date of the positive or negative test and/or diagnosis: [enter information]

Date the case first had one or more COVID-19 symptoms, if any: [enter information]

Information received regarding COVID-19 test results and onset of symptoms (attach documentation): [enter information]

Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
 - They were fully vaccinated before the close contact and do not have symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a Close Contact requirements.
- The names of those exempt from exclusion requirements because:
 - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

[enter 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:

1. All employees who were in close contact
2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?
[enter information]

What could be done to reduce exposure to COVID-19?
[enter information]

Was local health department notified? Date?
[enter information]

Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

Appendix E: Documentation of Employee COVID-19 Vaccination Status - **CONFIDENTIAL**

Employee Name	Fully or Partially Vaccinated ¹	Method of Documentation ²

¹Update, accordingly and maintain as confidential medical record

²Acceptable options include:

- Employees provide proof of vaccination (vaccine card, image of vaccine card or health care document showing vaccination status) and employer maintains a copy.
- Employees provide proof of vaccination. The employer maintains a record of the employees who presented proof, but not the vaccine record itself.
- Employees self-attest to vaccination status and employer maintains a record of who self-attests.