

COVID-19 Prevention Program (CPP)

Happy Valley Elementary School District

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

Date: March 1, 2021

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

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

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

Proactively evaluating their own working conditions and the school as a whole for safety issues and promptly expressing any safety concerns to the Superintendent/Principal and/or Administrative Assistants.

Employee Screening

We screen our employees by:

Employees will self screen using the online COVID-19 symptom check anytime they come on campus.

Non contact thermometers are available in the office and in every classrooms.

Staff will conduct health screens and temperature checks of students arriving onsite.

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:

Staff members who observe unsafe or unhealthy work conditions, practices, or procedures should promptly email the Superintendent/Principal and Administrative Assistant with their concerns. Reporting an issue will not result in action against the employee and no repercussions will be taken against any employee for submitting a report.

Following the report, the Superintendent/Principal will assess the severity of the hazard and determine the appropriate follow-up measures that need to be taken. The office staff will be responsible for confirming with the Superintendent/Principal that the issue has been resolved promptly.

Controls of COVID-19 Hazards

Physical Distancing

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

Practicing safe physical distancing (6' or more) at all times and adhere to all CDC guidelines.

Avoiding handshaking, hugs or other physical contact when greeting others.

Avoiding congregating in lobbies, hallways, etc. when moving about the workplace.

Meetings that do not absolutely require a visit to the office should be held via video conference.

Limiting visiting the desks and offices of your colleagues as much as possible. To contact another employee who is at the office with you, first try using your phone or Zoom to the extent possible.

Staggering the use of the staff room and other common areas.

Conducting all transactions with parents or the community outside if possible.

Limiting visitors to the school and not allowing volunteers in the classrooms.

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 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.

Employees are required to utilize a face covering while in the building at all times, unless by themselves in an enclosed office space. Face coverings must cover the nose and mouth with minimal, if any, gaps. Face coverings must tie behind the ears or head. Employees who do not bring a face covering, or whose face covering is inadequate, will be provided one. Both cloth and disposable face coverings are provided by the district and available to staff if needed. Cloth face coverings should be washed after each day of use. Disposable face coverings should be disposed of after a single day of use.

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.

Engineering controls

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

Personnel are encouraged to use their own reusable cloth face covering as often as possible to conserve PPE. Additional PPE will be provided to staff as needed.

Sneeze guards have been installed where high frequency customer service is performed.

One desk divider has been made available to teachers for student use.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

HVAC system filters have been replaced with MERV 13 filters. HVAC systems have been set to maximize the introduction of fresh outside air.

Free-standing HEPA air filters have been made available for all classrooms and office use.

All staff should consider performing their duties outside of possible.

All indoor spaces should be ventilated with outside air to the greatest extent possible by opening doors and windows in order to dilute indoor airborne contaminants and decrease disease transmission rates.

Cleaning and disinfecting

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

Gloves, sanitizing wipes, disinfectant, paper towels, and hand sanitizer have been made available to all staff members. Employees will be required to perform limited non-custodial cleaning and disinfecting of their own workstation of shared items (i.e.. copiers, staplers, paper cutters, fridge doors, etc.).

The custodian will continue to conduct routine cleaning as usual, using an electrostatic mister.

HVS has acquired an electrostatic mister to reduce cleaning and disinfecting times for classrooms, bathrooms, office and other spaces, when needed.

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

Close off areas visited by all ill persons. Open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before beginning cleaning and disinfection.

Cleaning staff should clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment (like tablets, touch screens, keyboards, remote controls) used by the ill person(s), focusing especially on frequently touched surfaces.

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:

Gloves, sanitizing wipes, disinfectant, antibacterial soap, paper towels and hand sanitizer have been available to all staff members.

Employees will be required to perform limited non-custodial cleaning and disinfecting of their own workstation and of shared items (i.e.. copiers, staplers, paper cutters, fridge doors, bathrooms, etc.). Employees have been trained on appropriate disinfection techniques through the relevant Keenan safety videos.

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:

HVS contains bathroom and classroom sinks, making handwashing with soap and water convenient in most settings.

We have posted CDC guidance in all restrooms and breakrooms.

Students and staff must wash hands frequently with soap and water for a minimum of 20 seconds. Specific time must be allocated for handwashing when students are present.

Hand washing is always more effective than hand sanitizer, but if a sink is not in proximity, utilize the hand sanitizer provided.

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. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

We provide and ensure use of 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.

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:

Be offered COVID-19 testing at no cost during their working hours.

Meet with the District Office Staff to review information regarding

COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.

With district guidance, review the flowchart for COVID-19 Exposure:

<https://sites.google.com/santacruzcoe.org/restore-staff/reopening-the-santa-cruz-coe/flow-chart-for-covid-19-exposure>

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, and how:

Employees should report COVID-19 symptoms immediately by phone to the Superintendent/Principal. If they cannot be reached, then the employee should call the District Office. Employees should report possible hazards to both the Superintendent/Principal and the District Office by email, unless the matter urgent, and then to ton or both by phone.

- 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:

Employees can obtain COVID-19 testing through the county testing program: <https://covid19test.santacruzcoe.org/> or through other testing options in the county: <https://www.santacruzhealth.org/HSAHome/HSADivisions/PublicHealth/CommunicableDiseaseControl/CoronavirusHome/SAVELivesSantaCruzCounty/GetTested.aspx>

Employees who test positive through any testing program should report their test results immediately without fear of reprisal.

- 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.

Testing will be conducted through alternative testing sites.

- 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 positive cases among staff or students will be reported to the following agencies: Santa Cruz County Health Department, Santa Cruz County Office of Education, Keenan (our insurance agency). Happy Valley Elementary School District will cooperate with the Santa Cruz County Health Department's contact tracing efforts. Employees will be notified of possible exposures as quickly as possible after they come to the administration's attention.

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.

All employees should complete Keenan's online COVID safety training videos.

All employees are encouraged to familiarize themselves with the information contained in Santa Cruz County Office of Education's COVID-19 Health Guidance for Schools: <https://covid19guidance.santacruzcoe.org>

Employees interested in additional training should contact the Superintendent/Principal.

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

Utilizing appropriate and available leave types.

- 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:

COVID-19 Prevention Program

- At least 24 hours have passed since a fever of 99.5 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.

Michelle McKinny, Superintendent/Principal

3/1/2021

Title of Owner or Top Management Representative

Signature

Date

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: Michelle McKinny and County Office of Education

Date: July 1, 2020

Name(s) of Employees and Authorized Employee Representative that Participated:

Paige Lynd and Donna Walker

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 employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation
All Buildings	07-01-2020	None	Checked

Appendix B: COVID-19 Inspections

Date: 2/25/2021

Name of Person Conducting the Inspection: Michelle McKinny

Work Location Evaluated: HVS

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/Partitions	YES		
Ventilation (amount of fresh air and filtration maximized)	YES		
Additional room air filtration	YES		

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Administrative			
Physical distancing	YES		
Surface cleaning and disinfection (frequently enough and adequate supplies)	YES		
Hand washing facilities (adequate numbers and supplies)	YES		
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	YES		

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

Appendix C: Investigating COVID-19 Cases

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

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

Date:

Name of Person Conducting the Investigation:

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location 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 (attach additional information):	
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Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

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

Appendix D: COVID-19 Training Roster

Date: 1-12-2021

Name of Person Conducting the Training: Keenan Safe Schools

Employee Name	Signature
Training Log Kept through Keenan Safe Schools On Line Training	

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.

- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Respiratory protection.

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

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

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at 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**.