

***Sequoia Union High School District***

**COVID-19 PREVENTION PROGRAM (CPP)**

**PURPOSE**

The purpose of the Sequoia Union High School District's (the District) COVID-19 Prevention Program ("CPP") is to provide a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the District from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

**SCOPE**

This CPP applies to all District employees except for those employees who are exclusively working remotely or subject to the Aerosol Transmissible Diseases ("ATD") program.

**DEFINITIONS**

For the purposes of the CPP, the following definitions apply:

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

"COVID-19 case" means a person who either: (1) Has a positive "COVID-19 test" as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a "COVID-19 case" when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

"Close contact COVID-19 exposure" means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" as defined here. This definition applies regardless of the use of face coverings.

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

"COVID-19 symptoms" means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6)

headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

"COVID-19 test" means a viral test for SARS-CoV-2 that is both:

- (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and
- (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

"Exposed workplace" means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. This can also include an offsite field location.

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

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

"High-risk exposure period" means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten days after the specimen for their first positive test for COVID-19 was collected.

### **AUTHORITY AND RESPONSIBILITY**

The 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 have implemented the following in our workplace:

- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace as they occur.

- Review of applicable orders, general and industry-specific guidance from the Centers for Disease Control, State of California, Cal/OSHA, the San Mateo County Office of Education and the County of San Mateo Public Health related to COVID-19 hazards and prevention.
- Existing COVID-19 prevention controls in our workplace and we will evaluate the need for different or additional controls, as the need arises.
- Periodic inspections 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 employee representatives are encouraged to continue to participate in the identification and evaluation of COVID-19 hazards.

### **EMPLOYEE SCREENING**

All employees participate in daily screening for COVID-19 symptoms prior to entering District worksites and facilities by using the District adopted screening tool.

### **CORRECTION OF COVID-19 HAZARDS**

Unsafe or unhealthy work conditions, practices or procedures will be documented and corrected in a timely manner based on the severity of the hazards.

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

#### **I. Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace. Individuals will be kept as far apart as possible in situations where six feet of physical distancing cannot be achieved. District specific workplace methods include:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures to allow greater distance between employees.

#### **II. Face Coverings**

The District provides face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, 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 San Mateo County Health. Employees are encouraged to contact their supervisor if they need additional face

coverings or have any other concerns.

Accommodations will be considered on a case-by-case basis for 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.

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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

### **III. Engineering Controls/Air Quality**

The District maximizes, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. The District takes all reasonable precautions to prevent the distribution of unhealthy air circulating through District facility air distribution systems. These precautions include performing regular preventive maintenance and filter changes, exclusive use of high efficiency air filters, and maximizing outside fresh air intake in the operation of our buildings' air distribution systems wherever possible (weather permitting).

The District continues to perform extensive mechanical engineering analysis of existing HVAC systems.

### **IV. Cleaning and Disinfecting**

The District continues to implement the CDPH and San Mateo County Pandemic Recovery Framework cleaning and disinfection measures for frequently touched surfaces as outlined in our School Reopening Plan including:

- Placing hand sanitizer dispensers in lobbies/common areas
- Propping doors open to reduce touching of handles as appropriate
- Providing disinfectant wipes in appropriate locations; post signage advising occupants to sanitize touch surfaces before and after each use
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Ensuring adequate supplies and adequate time for the cleaning to be done properly.

Should the District have a COVID-19 case in the workplace, it is a priority that District facilities, the workplace, and District vehicles are maintained at the highest standard of cleanliness. The District has directed the janitorial service providers using contract amendments to 1) conduct more frequent cleanings throughout the day in public spaces and common areas, as well as 2) use EPA-approved germicide/disinfectant products to ensure all surfaces and touchpoints in public areas and within the workplace are properly sanitized. A more detailed cleaning protocol is available from the District upon request.

**V. 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.
- 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.

**VI. Hand Sanitizing**

We have implemented effective hand sanitizing procedures by:

- Evaluating handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer.
- Encouraging employees to wash their hands for at least 20 seconds each time.

**VII. Personal protective equipment (PPE) used to control employees' exposure to COVID-19**

We continuously 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.

**VIII. Transportation**

**Cleaning and Disinfecting**

- 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.

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

Employees who have potential (close contact) **COVID-19 exposure in the workplace** will be (This section does not apply to those whose exposure did not occur in the workplace):

- Instructed to remain at or return to their home or place of residence and not return until such time as the employees satisfy the minimum criteria to return to work. Telework may be available at this time.
- Offered COVID-19 testing at no cost during their working hours.
- Will be provided with information on benefits continuation.

## **SYSTEM FOR COMMUNICATING**

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

- Employees should report COVID-19 symptoms and possible hazards to their supervisor or Human Resources if they have any concerns. Employees can report symptoms and hazards without fear of retaliation or reprisal.
- Employee representatives should contact Human Resources to identify any hazards or concerns.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are encouraged to discuss options with their supervisor or Human Resources.
- Where testing is not District provided or paid, employees can access COVID-19 testing through their primary healthcare provider or <https://www.smcgov.org/testing>.
- In the event the District is required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Information about COVID-19 hazards employees (including other employees 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 will be documented and provided.

## **TRAINING AND INSTRUCTION**

We continue to 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 facecoverings.

- 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.

### **EXCLUSION OF COVID-19 CASES**

#### **Exclusion of COVID-19 Cases from District Worksites and Facilities**

The District will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria. Telework may be available during this time.

#### **Exclusion of Employees with Close Contact COVID-19 Exposures from District Worksites and Facilities**

The District will exclude employees with close contact COVID-19 exposure from the workplace for 14 days after the last known close contact COVID-19 exposure. The District and employee will review options such as telework during this time, as appropriate.

#### **Provision of Benefits to District Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure**

##### **I. Employees Who Are Able to Telework During Isolation or Quarantine Period**

The District will allow employees who are able to telework, and are able and available to work, to telework during the isolation or quarantine period. The District will provide these their normal compensation for the work that they perform for the District during the isolation or quarantine period.

##### **II. Employees Who Are Unable to Telework During Isolation or Quarantine Period**

The provision of benefits described below does not apply to either: (1) District employees who the District can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) District employees who are unable to work for reasons other than protecting employees and non-employees at District worksites and facilities from possible COVID-19 transmission.

The District will require that employees who are unable to telework, but are otherwise able and available to work, to use paid sick leave in order to receive compensation during the isolation or quarantine period. District employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The District may provide such employees who are unable to telework, but who do not have any paid sick leave available, other paid leave in order to receive compensation during the isolation or quarantine



period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the District will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

The District may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

### **REPORTING, RECORDKEEPING, AND ACCESS**

It is the District's 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 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.
- 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.
- Keep a record of and track all COVID-19 cases. The information is made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

### **RETURN-TO-WORK CRITERIA**

#### **I. Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases**

The District requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any District worksite or facility until they satisfy each of the following conditions:

- At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications; and
- COVID-19 symptoms have improved; and
- At least 10 days have passed since COVID-19 symptoms first appeared.

#### **II. Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases**

The District requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any District worksite or facility until:

- a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test; OR
- If a licensed health care professional determines the person is not/is no longer a COVID- 19 case, in accordance with California Department of Public Health (CDPH) or local health department recommendations.

**COVID-19 Testing Not Required in Order to Return to Work**

In accordance with CDPH guidance concerning symptom-based strategies for the discontinuation of isolation, the District does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

**Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official**

If employees are subject to an isolation or quarantine order issued by a state or local health official, the District requires that the employees not report to any District worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

**Allowance by Cal/OSHA for an Employee to Return to Work**

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

In such cases, the District will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the District worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.

## **ADDITIONAL CONSIDERATIONS**

### **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, the District 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.

### **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.