

# COVID-19 Prevention Program (CPP)

## Nevada City School of the Arts

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

**Date:** 01/21/2021

### Authority and Responsibility

Holly Pettitt, School Director 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.

Protocols, actions, and template communications are in place for the following COVID-19 related scenarios.

1. A student or staff member either exhibits COVID-19 symptoms, answers yes to a health screening question or has a temp of 100.4 or above.
2. A family member or someone in close contact with a student or staff member tests positive for COVID-19.
3. A student or staff member tests positive for COVID-19.
4. A student or staff member tests negative for COVID-19 after any of the reasons/ scenarios a, b, or c

NCSA staff will continuously evaluate the risk of COVID-19 hazards by monitoring traffic flow and number of people in each room. Additionally, NCSA has asked admin support staff to work from home as much as possible to minimize the exposure risks on campus.

## **Employee Participation**

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

All employees are trained to look for signs of symptoms in others on campus by monitoring for symptoms, and by ensuring everyone who comes to campus has completed the COVID-19 Daily Health Screening questionnaire. If they have not completed the questionnaire, NCSA staff can do it themselves on site, or other staff can conduct the screening.

## **Employee Screening**

We screen our employees by:

All employees who report to work (in-person) are required to perform a self-administered Daily Health Screening check for COVID19 symptoms before arriving to work via NCSA's ParentSquare app. In addition, staff will check-in at the front office to have their temperature taken if they have not taken their own before coming to school. Employees who have a fever of 100.4 degrees Fahrenheit or higher and/or any of the COVID symptoms will be directed to remain home, notify his or her supervisor and await instructions and a contact from the School Nurse or designated staff. If there is follow up needed, we have trained staff who will contact employees to do additional contact tracing/health screening.

## **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:

- Designated staff will notify School Nurse of possible exposure immediately.
- Investigate the COVID-19 illness and exposures and determine if any work-related factors could have contributed to risk of infection.
- School Nurse or designated staff will notify the county public health department immediately, if a positive case has been verified on campus. Human Resources will also be notified to report the case the workers comp.
- School Nurse or designated staff will notify any staff or students/families that may have had direct exposure with any positive COVID-19 case while maintaining confidentiality as required by state and federal laws.
- NCSA will close off any areas used by any sick person and will not use them for 24 hours or before cleaning and disinfecting.
- Update protocols as needed to prevent further cases in accordance with CDPH Guidelines ("Responding to COVID-19 in the Workplace").
- Implement communication plans for exposure at school and potential school closures to include outreach to students, parents, teachers, staff and the community.

- Include information for staff regarding labor laws, information regarding Disability Insurance, Paid Family Leave and Unemployment Insurance, as applicable.
- Provide guidance to parents, teachers and staff reminding them of the importance of community physical distancing measures while a school is closed, including discouraging students or staff from gathering elsewhere.

## **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:

NCSA has asked staff that are able to work remotely to do so as much as possible to reduce the possibility of exposure.

Breaks and break rooms are managed to allow employees to eat on premises in designated areas or outside where they can remain 6 feet apart.

When practicable, physical distancing of five to six is maintained to the greatest extent possible and distancing may be permissible down to four feet within classroom or instructional area where requirements are in practice;

Line Markings have been placed at least six feet apart on sidewalks or other walkways near public entrances with signs directing students to use the markings to maintain distance.

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.

Following CDPH Guidelines, all staff and visitors are required to wear a face covering when on campus. We have disposable face coverings available in our front office at each building. Additionally, we have reusable and disposable masks available for staff if they do not have their own. There are signs located around campus showing the proper use of face coverings. Additionally, all employees have gone through training on proper use and care of face coverings.

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

For situations where we cannot maintain at least six feet between individuals we have either installed or purchased portable sneeze guards that can be used where necessary, and we require face coverings be worn. In addition, we have partitions set up in larger areas to separate groups of students.

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

We have installed MERV 13 filters in our school buildings that are changed on a regular schedule and changed more often when air quality is poor. We have increased the fresh air flow by installing opening windows where possible. We have also installed iWave air cleaners in our HVAC units that purifies the air through bi-polar ionization.

### **Cleaning and disinfecting**

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

NCSA will meet cleanliness standards as outlined by the CDE and the CDPH prior to reopening and will maintain this high level of cleanliness throughout the school year. In accordance with CDC and CDPR guidance, and in consultation with local public health officials, staff will implement correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning.

Disinfecting of surfaces between uses may include, but is not limited to: desks, tables, chairs, keyboards, headsets, and copy machines.

High touch surfaces will be disinfected frequently and at least daily. High-touch surfaces may include, but are not limited to: door handles, rails, sink handles, restroom surfaces, games, art supplies, and instructional materials.

Use of shared materials will be limited as much as practicable. Students are assigned personal school materials and supplies, may include, but are not limited to: pencils, pens, colored pencils, markers, rulers, water bottles, and fidget items.

Selected disinfecting products will be approved for use against COVID-19 on the Environmental Protection Agency (EPA) List N: Disinfectants for Use Against SARS-CoV-2.

When using these disinfecting products, label directions for appropriate dilution rates and contact times will be followed. Disinfecting and airing out the space will occur before students arrive and after students leave. Thorough cleaning and disinfecting will occur when children are not present.

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

Areas used by any person who has been identified with a positive COVID case, will be closed off and not used before completion of cleaning and disinfection by NCSA Custodians. To reduce risk of exposure, if possible, a wait time of 24 hours will be implemented before cleaning and disinfecting. When not possible to wait 24 hours, a wait time as long as practicable will be implemented.

### **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:

In accordance with the Healthy Schools Act, CDPR guidance, and Cal/OSHA regulations, staff training will be provided as recommended by state and local health standards. These trainings include, but are not limited to:

- Proper use of protective equipment
- Teaching staff will provide students training on the proper use of face coverings which will include instruction to minimize touching of face coverings, proper placement and removal, cleaning, and how to avoid the potential cross contamination
- Keeping one's hands away from one's face, aka "Henry the Hand do not touch the T-Zone"
- Cough and sneeze etiquette
- Frequent hand washing and proper technique
- Cleaning and Disinfecting
- Confidentiality around health recording and reporting
- Manifestations of COVID-19 symptoms
- CDC transmission-based precautions.

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:

Routine hand washing, will occur more frequently with scheduled times throughout the day for both staff and students. Student hand washing will be implemented one-student at a time to help support physical distancing.

Students and staff will wash hands upon arrival and exit transitions on campus/within the classroom, as well as, scheduled times posted throughout the day, often coordinated with transitions times in/out of the classroom, such as, PE, recess, or lunch times.

## **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:

We have purchased at-home saliva testing kits that have been provided to the teaching and support staff for emergency situations in which symptoms have developed and a quick turn around is needed. All employees are offered free COVID-19 testing through our local testing facility, as well as no dock for time off to get tested.

## **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:

NCSA has established a COVID task force that is in constant communication with the School Nurse to ensure that they are updated and trained to understand COVID-19 symptoms and possible hazards. Employees are instructed to notify this staff when they have symptoms or exposure.

- 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:

Nevada County Superintendent of Schools has also opened up a testing center for symptomatic only staff to be tested, in addition to establishing a school staff only testing time designated by our local healthcare center Western Sierra Medical Center.

- 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.

We have addressed this issue above.

- 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.

Safety protocols and equipment are regularly reviewed and updated as needed and protocols are addressed in our Injury Illness and Prevention Plan (IIPP).

## **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.

NCSA has required staff to complete the Coronavirus: Cleaning and Disinfecting Your Workplace and other hazard trainings through SafeSchools. All training was completed within the first two weeks of the beginning of the school year or being hired. Additionally, we do procedural updates, trainings, and/or reminders at staff meetings and through email messages as necessary.

**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:  
COVID-19 Prevention Program

- 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

NCSA will follow all Department of Labor laws to ensure that our staff are covered during COVID-19. Most employees will be able to work from home during any quarantine or home isolation period, and if necessary, all benefits through the Families First Coronavirus Response Act will be available.

- 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.

**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:**

**Date:**

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

<b>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</b>	<b>Places and times</b>	<b>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</b>	<b>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</b>

## Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

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			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Administrative</b>			
Physical distancing			
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
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Face shields/goggles			
Respiratory protection			

## **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.