

COVID-19 Prevention Program (“CPP”) The Cottonwood School

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur on the TCS campus workplace.

Date: 1/25/21

Authority and Responsibility

The Cottonwood School (“TCS” or the “School”) Administrator or designee has overall authority and responsibility for implementing this CPP's provisions in the workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and ensuring employees receive answers to the program's questions 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

TCS will implement the following in the 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 the 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 the 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 ensure compliance with the School's COVID-19 policies and procedures.

Employee Participation

Employees and exclusive representatives, as applicable, are encouraged to participate in the identification and evaluation of COVID-19 hazards. Employees and their representatives are urged to immediately identify COVID-19 hazards and report them to their supervisor(s). If further evaluation is needed, the TCS School Nurse will be consulted. El Dorado County Public Health will provide the district with expertise and guidance. The School may contact [Jodiann Beeson at 530.285.2578 to discuss any potential COVID-19 hazards.

Employee Screening

Employee screening procedures for COVID-19 include:

- Employee self-screening for COVID-19 symptoms and temperature check before entering the workplace.
 - Self-checks will be recorded daily at each work site.
- Staff who demonstrate symptoms of COVID-19, have been exposed to someone who is positive for COVID-19, and/or have a temperature of over 100.4 degrees Fahrenheit may not enter the workplace.
- Further detailed information regarding the School's COVID-19 screening process can be found in the TCS COVID-19 Health and Safety Policy.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices, or procedures will be documented on 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 assessed, and correction time frames assigned accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Controls of COVID-19 Hazards

Physical Distancing

Where possible, TCS will ensure at least six feet of physical distancing at all times in the workplace by:

- Eliminating the need for some workers to be in the workplace, including continued telework or other remote work arrangements whenever feasible.
- Reducing the number of persons in an area at one time, including limiting non-essential 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 as feasible
- Adjusted work processes or procedures to allow a greater distance between employees as feasible.
- Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

TCS provides clean, undamaged face coverings and will 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. Current guidance requires all individuals two (2) years of age and older to wear a face covering at all times, unless an applicable exception applies. Additional face coverings are available upon request from a supervisor, office staff, or the school nurse. The following are exceptions to the use of face coverings in the workplace:

- When an employee is alone in a room.
- While actively 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 documented disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- All face coverings must be worn, cleaned, and replaced as needed, and unless an applicable exception to wearing a face covering applies, consistent with the School's COVID-19 Health and Safety Policy.
- 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. However, testing an employee twice per week is not an alternative to wearing a facial covering where otherwise required.

Engineering controls

To the maximum extent feasible, the School will implement all appropriate actions to protect employees where six (6) feet of physical distancing cannot be maintained, consistent with the COVID-19 Health and Safety Policy, as well as this Plan. The School will implement the following measures for situations where at least six feet between individuals cannot be maintained:

- All employees must wear a facial covering at all times, unless an applicable, documented exception applies.
- All employees are responsible for maintaining and monitoring a six-foot or more distance from other staff members or students. If six feet distance cannot be maintained, the employee will notify a supervisor to ensure that adequate distance can be established.
- Employees can request partitions where needed to be used for extra protection in addition to physical distance.
- TCS will maximize, to the extent feasible the quantity of outside air for School buildings with mechanical or natural ventilation systems, except when the United States EPA Air Quality Index is greater than one hundred (100) for any pollutant, or if opening windows or doors would cause additional hazards to employees.
- Filters will be changed regularly. Whenever feasible, doors and windows will be opened to ensure unobstructed airflow. Air purifiers may be used to increase safety for students and staff wherever feasible.

Cleaning and disinfecting

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

- Informing the employees and any exclusive representatives of the frequency and scope of cleaning and disinfection.
- Ensuring adequate supplies, training, and adequate time for sanitization to be done properly.
- Follow the federal, state, and local guidance for Cleaning and Disinfecting to develop, implement, and maintain a plan to perform regular cleanings to reduce the risk of exposure to COVID-19, consistent with the TCS COVID-19 Health and Safety Policy.
- Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
 - If surfaces are dirty, clean them using a detergent or soap and water before you disinfect them in accordance with Healthy Schools Act protocols.
 - For disinfection, most common, EPA-registered, household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is available on the EPA website. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method, and contact time).
- Discourage workers from using each other's phones, desks, offices, or other work tools and equipment, when possible.
- Provide disposable disinfecting wipes so that employees can wipe down commonly used surfaces (e.g., keyboards, remote controls, desks, other work tools and equipment) before each use.
- Store and use disinfectants in a responsible and appropriate manner according to the label.
- Do not mix bleach or other cleaning and disinfection products together. This can cause fumes that could be very dangerous to breathe in.
- Advise employees to always wear gloves appropriate for the chemicals being used when they are cleaning and disinfecting and that they may need additional PPE based on the setting and product.

Cleaning and Disinfecting in the Event of a Workplace Exposure

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

- The School will determine all areas, materials and equipment used by the COVID-19 case during the high-risk

exposure period.

- Cohort, class, and school may be closed so that the immediate area can be deep cleaned and sanitized by TCS custodial staff.
- Once identified, the School will follow all CDC cleaning and disinfection recommendations in pertinent areas.
- A special high-level cleaning system (VP200ESK) has been purchased for each site and will be used to completely sanitize classrooms and workspaces.

Shared tools, equipment and personal protective equipment (PPE)

- The School will not allow any employees, students, or any other persons to share any form of PPE, including but not limited to: 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.
- Employees will be provided with hospital-grade cleaning fluid and training to sanitize high-touch surfaces, including any surfaces that may be shared between use.
- Sharing of vehicles will be minimize to the extent feasible, and high-touch points (i.e., steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

Hand sanitizing

In order to implement effective hand sanitizing procedures, the School will:

- Evaluate hand washing facilities in classrooms and workspaces.
- Determine the need for additional supplies and equipment.
- Encourage and allow time for the employee and student handwashing, at least 20 seconds each time.
- Encourage students and all employees to wash their hands for at least 20 seconds each time.
- Place posters that encourage hand hygiene to help stop the spread at the entrance to campus and in other workplace areas where they are likely to be seen. This will include signs for non-English speakers, as needed.
- Provide employees and students with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol).

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

- The School will 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, the School will evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.
 - In this situation, the School will provide and ensure the 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.
- Effective immediately, upon one (1) "COVID-19 case"¹ in the workplace, the School will:

¹ Cal/OSHA regulations define a "COVID-19 case" as a person who: 1) Has a positive COVID-19 test, 2) is subject to a COVID-19 related order to isolate issued by a local health department 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 COVID1-9 statistics of a county.

- Investigate the COVID-19 case, determine the day and time the COVID-19 case was last present on the School campus, the date of the positive test and/or diagnosis, and the date the case has one (1) or more COVID-19 symptoms, if any.
- Investigate whether other School employees or any other third parties may have had a COVID-19 exposure by evaluating the activities of the COVID-19 case at the School campus during the “high-risk exposure period”².
- Give notice of potential exposure, within one (1) business day, and without revealing any personal identifying information³ of the COVID-19 case, to:
 - 1) All employees and their authorized representatives, if any, who may have had COVID-19 exposure, and
 - 2) Independent contractors and other employers present at the workplace during the high-risk exposure period.
- Offer testing for COVID-19 to all employees with potential COVID-19 exposure in the workplace, at no charge and during working hours, as well as:
 - Information regarding COVID-19-related benefits under all applicable federal, state, and local laws, as well as potential salary continuation rights during any period of exclusion due to the COVID-19 exposure.
- Investigate the potential that workplace conditions contributed to the risk of COVID-19 exposure, as well as remedial steps that could have been taken to reduce the risk of COVID-19 exposure.
- Employees who had potential COVID-19 exposure in the workplace will be:
 - Referred for COVID-19 testing through community testing by El Dorado County Public Health. Any such testing will be free of charge and during working hours.
 - The TCS School Nurse will provide health information, support, and contact tracing as requested.
 - The information on benefits described in Training and Instruction and Exclusion of COVID-19 cases will be provided to employees.
 - Leave options for quarantine or illness will be discussed with each employee individually.

System for Communicating

The School’s goal is to ensure effective two-way communication with employees, in a form that all employees can readily understand, and that it includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to the immediate supervisor:
 - A team of three (3) (Executive Director/Principal, School Nurse & Human Resources) serves as the confidential COVID team to assist TCS with potential and active COVID cases, policies and procedures. Health and safety policies and procedures are monitored and communicated by the Director.
- That employees can report symptoms and hazards without fear of reprisal.
- Consistent with the Employee Handbook and all applicable policies, the School will not tolerate discrimination, harassment, or retaliation against any employee who reports COVID-19 symptoms or hazards.
- TCS’ procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with the School) may be exposed to, what is being done to control those hazards, and the School’s COVID-19 policies and procedures.
- Where testing is not required, how employees can access COVID-19 testing:
 - Community testing is available for free through El Dorado County Public Health.
 - The TCS School Nurse is available as a resource.
- In the event that TCS is required to provide testing because of a workplace exposure or outbreak, the School will

² “High-risk exposure period” is defined by Cal/OSHA as: 1) For individuals with COVID-19 symptoms, from two (2) days before the symptoms first develop 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 asymptomatic individuals who test positive for COVID-19, from two (2) days before until ten (10) days after the first positive COVID-19 test specimen was collected.

³ All personally identifying information related to COVID-19 cases or those with COVID-19 symptoms shall be kept confidential. However certain information may be provided to public health authorities, as required by law.

communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. Such testing may include but is not limited to:

- In the event of one (1) COVID-19 case, an outbreak⁴, or a major outbreak at the School campus, the School will offer COVID-19 testing to employees with exposure at no charge, and during working hours.
- In the event of one (1) COVID-19 case in the workplace, COVID-19 testing will be offered to all employees who have had potential COVID-19 exposure.
- In the event of a COVID-19 outbreak pursuant to Cal/OSHA regulations:
 - The School must provide testing to all employees who were present in the exposed workplace.
 - Pursuant to Cal/OSHA regulations, “employees in the exposed workplace shall be tested and then tested again one week later.”⁵
 - After the first two (2) COVID-19 tests, the School must provide continuous COVID-19 testing of employees remaining at the workplace at least once per week, until outbreak criteria are no longer met.
- In the event of a “major COVID-19 outbreak,”⁶ the School will provide COVID-19 testing at least twice per week to all employees present at the exposed workplace during the thirty (30) day period, and who remain at the workplace. This testing regimen will continue until there are no new COVID-19 cases in the workplace for a fourteen (14) day period.
 - El Dorado County Public Health will be consulted, and follow-up or additional testing and mitigation may occur at their direction.
- Consistent with current Cal/OSHA regulations, the School will require certain frequencies of COVID-19 testing before allowing employees with COVID-19 exposure to return to campus.

Training and Instruction

TCS will provide effective training and instruction that includes:

- The School’s 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 (including the Families First Coronavirus Response Act which TCS will continue benefits through March 31, 2021), 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 handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing facility. That hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- **Appendix D: COVID-19 Training Roster** will be used to document this training.

⁴ An outbreak is defined by Cal/OSHA as one that is declared by the local public health department, or where there are three or more cases on campus within a 14-day period. 8 CCR §3205.1(a)(1).

⁵ 8 CCR §3205.1(b)(2)A).

⁶ Cal/OSHA defines a major outbreak as “20 or more COVID-19 cases in an exposed workplace within a 30-day period.”

Exclusion of COVID-19 Cases

In the event of a COVID-19 case in the workplace, TCS will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until 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 the COVID-19 exposure is deemed work-related pursuant to all applicable worker' compensation laws. This will be accomplished by providing employees with their options for sick leave benefits, payments from public sources, or other means of maintaining earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is the School's policy to:

- Report information about COVID-19 cases in the 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 the place of employment or in connection with any employment.
- Maintain records of the steps taken to implement the School's written COVID-19 Prevention Program for at least one year, in accordance with CCR Title 8 section 3203(b).
- Make the School's written COVID-19 Prevention Program available at the workplace to employees, exclusive representatives, if any, 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.

The Cottonwood School

Executive Director/Principal

Cindy Garcia

Signature *Cindy Garcia* Date 1/26/2021

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. TCS 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:

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

Appendix B: COVID-19 Inspections

Date:

Name of Person Conducting the Inspection:

Work Location Evaluated:

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

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Handwashing 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)			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

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

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

Date:

Name of Person Conducting the Investigation:

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where the 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 is 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 the 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: << >>

Name of Person Conducting the Training: <<Need Name Here>>

Employee Name	Signature
All Certificated & Classified Staff (Zoom Meeting)	