



COVID-19 Prevention Program (CPP)

September 15, 2021

COVID-19 Prevention Program (CPP) for the Golden Feather Union Elementary School District

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

Date: September 15, 2021

Authority and Responsibility

Superintendent Mr. Josh Peete has overall authority and responsibility for implementing the provisions of this CPP in our workplace. Mr. Peete is responsible for implementing and maintaining the CPP for all 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.
- Document the vaccination status of our employees using a spreadsheet which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace. When a case is reported:
 - Employee is sent home
 - Contact tracing begins (following CDPH and CDC guidelines)
 - Evaluate Workplace Hazards and Mitigate
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/ OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify and evaluate unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures. 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.

Employee participation

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

Guidelines for Daily Wellness Checks

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

Correction of COVID-19 Hazards

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

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

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

Control of COVID-19 Hazards

Face Coverings

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

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

progressive discipline model.

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

- When an employee is alone in a room or a vehicle.
- While eating or drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent feasible.
- Employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Such employees will wear an effective, nonrestrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

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

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

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

Engineering controls

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

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

Cleaning and disinfecting

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

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

Coronaviruses on surfaces and objects naturally die within hours to days. Warmer temperatures and

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

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

Disinfecting procedures include:

- Some surfaces only need to be cleaned with soap and water. For example, surfaces and objects that are not frequently touched should be cleaned and do not require additional disinfection.
- Clean and disinfect frequently touched surfaces daily and shared workspaces and work items before and after use.
- Store and use disinfectants in a responsible and appropriate manner according to the label.
- Keep all disinfectants out of the reach of children. Disinfectants should typically not be applied on items used by children, especially any items that children might put in their mouths. Many disinfectants are toxic when swallowed.
- Do not overuse or stockpile disinfectants or other supplies.
- Always wear gloves appropriate for the chemicals being used when you are cleaning and disinfecting. Additional personal protective equipment (PPE) may be needed based on setting and product.
- Areas unoccupied for 7 or more days need only routine cleaning.
- Outdoor areas generally require normal routine cleaning and do not require disinfection.
- Using CDC guidelines, high touch site sanitizing or disinfecting rounds will be made daily in high traffic areas. Schedules for disinfecting will be dynamic and based on the number of people in a building and potential outbreaks. Each classroom and work area will be disinfected daily using an Electrostatic Sprayer
- All employees may perform limited non-custodial cleaning and sanitizing, such as at the employee's work area or use of shared equipment, e.g., copiers.
- Additional custodial staff remain on site to provide additional cleaning.
- Cleaning supplies and materials are made available in every classroom and work area.
- Should we have a COVID-19 case in our workplace, we will implement the following procedures:
- If an employee goes home because they are sick the building and facility guidelines are followed to disinfect the area/from/office where the person worked, the tools and equipment they prior to use by others.
- If the case is identified as a COVID-19 illness all air exchange filters are immediately replaced with a filter identified with a MERV 10 or higher rating
- When possible rooms are not cleaned for 24 hours.
- All rooms will be completely sanitized and sprayed with an Electrostatic Sprayer using disinfecting agents identified to kill COVID-19.
- Current custodial staff have been trained in the use of chemicals and perform all the cleaning when a COVID-19 case is identified.
- Custodial staff have received training through Keenan Safe Schools on how to properly disinfect when working within a high-risk exposure area.

Shared tools, equipment and personal protective equipment (PPE)

- PPE must not be shared, e.g., gloves, goggles and face shields.
- Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. All attempts are made to avoid sharing between staff and/or students. Where there must be sharing, the items will be disinfected between uses by classified and certificated staff. Staff have been provided wipes and spray disinfectant to sanitize shared materials.
- Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users. Bus drivers have been trained to disinfect their buses by wiping down high touch areas and using an Electrostatic Sprayer to disinfect all surface areas.

Hand sanitizing

To implement effective hand sanitizing procedures, we:

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

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

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by section 3380, and provide and ensure use of such PPE as needed.

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

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

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

Testing of symptomatic employees

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

Investigating and Responding to COVID-19 Cases

We have developed effective procedure to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This is accomplished by using a document with information from the **Appendix C: Investigating COVID-19 Cases** form.

A flow chart provided by the Butte County Office of Education will direct how employees who had potential COVID-19 exposure in our workplace. The flow chart can be found in **Appendix E: Golden Feather Employee COVID-19 Flow Chart**

System for Communicating

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

- Who employees should report COVID-19 symptoms, possible close contacts and hazards to the site administrator.
- All employees can report symptoms and hazards without fear of reprisal.
- Employees who are identified as high risk may participate in the Interactive Process. This would begin with a doctor's note.
- Employees who have access to multiple free testing the sites. GFUESD works closely with Optum Serve and Rite Aid. When not required employees can access both programs. In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test. If this occurs employees will be directed to Optum Serve or Rite Aid for testing. While waiting for test results the employee will be on leave if they have been identified as a close contact.
- Employees have been trained through Keenan Safe Schools to assist in looking for hazards.
- Classified and Certificated Presidents will meet weekly with the superintendent to discuss matters and resolve any issues.
- Classified and Certificated Presidents are notified of all cases within the district.

Training and Instruction

We provide effective employee training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.

- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - The conditions where face coverings must be worn at the workplace.
 - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

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

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

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
 - Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
 - Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with 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 a document with information from Appendix C: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases.

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, 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, students, parents/guardians, members of the public, 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 employee 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			
Administrative			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
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 the District 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:

COVID-19 Case Investigation Information

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):			

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.

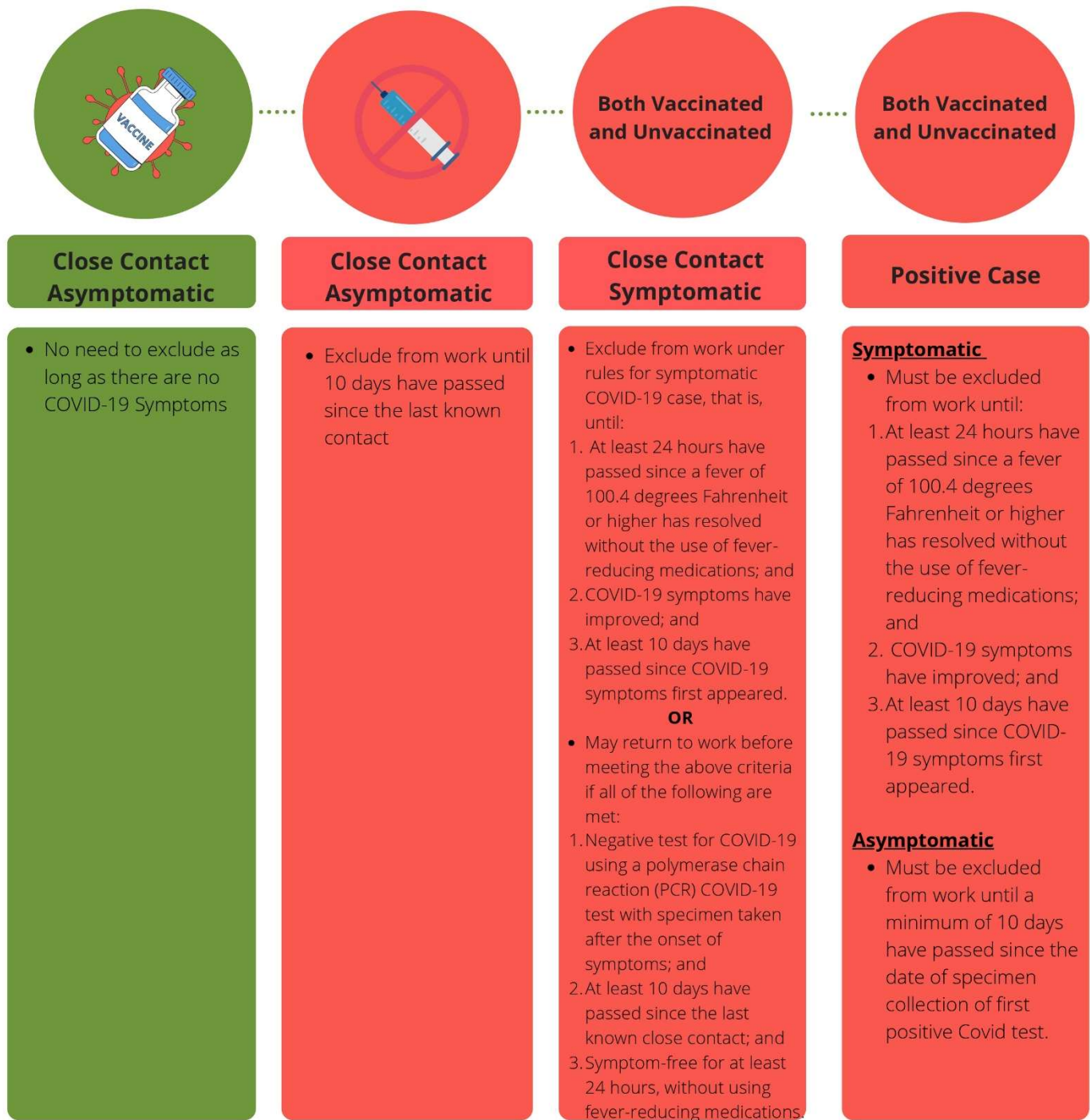
Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature

Appendix E: Golden Feather Employee COVID-19 Flow Chart



**It is the employer's responsibility to make sure all employees are aware of what to do if they develop possible COVID-19 symptoms or if they test positive for COVID-19. These rules apply to management employees just as much as to rank-and-file staff.*

**COVID-19 Symptoms are listed on the BCOE [self-screening app](#).*