

COVID-19 Prevention Program (CPP) for Contra Costa County Office of Education

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. **Date: 01/01/2021 (Revised 05/17/2023)**

Authority and Responsibility

Lynn Mackey, Superintendent of Schools 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 8: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: attending COVID-19 training, engaging in ongoing and exposure communication, participating in contact tracing and health screening, following COVID-19 policies, procedures and posted signage, exercising good personal hygiene and maintaining a sanitized work station, reporting safety or hygiene hazards, and enforcing COVID-19 policies and procedures with students and parents (this includes but is not limited to educating and informing, wearing a face covering, physical distancing, contact tracing and health screenings, isolating, reporting of exposures, etc.).

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:

The severity of the unhealthy work conditions, practices or procedures will be assessed through investigation and will be based on compliance with scientific practices known to reduce or prevent the transmission of COVID-19 as determined by state and local health guidance, regulations, and orders. Interviews with individuals who may be familiar with the condition, practice or procedure being inspected, or with those who may have valuable contributions towards the assessment of the conditions, may be conducted.

Control of COVID-19 Hazards

Face Coverings

We provide annual fit testing for facility workers and custodians, clean, undamaged N95 face coverings and ensure they are properly worn by employees when required by a California Department of Public Health (CDPH) regulation or order.

Engineering Controls

We implement the following measures to mitigate the spread of COVID-19:

- Providing necessary PPE's
- Maintain sanitation stations

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

- Ensuring all windows are operational and easy to operate as originally installed and designed
- Mechanical systems are adjusted/programmed to allow maximum outside air when permissible
- Building Automated Systems are in place to adjust outside air intake to minimal positions when weather and or air quality is below standards
- Pre and Post occupancy (Start/End) purge cycles are programmed to ensure adequate fresh air
- HVAC Operating systems are serviced within industry standards (ASHREA), manufacture's recommendations and align with State, County Health guidelines
- Filters upgraded to MERV-13 efficiency rating
- HVAC Contract Service Agreement reflects all items above
- Use of Air Filtration units are in use where and when requested

CLEANING AND SANITATION

Cleaning During the Day

(Teachers, Aides & Staff)

Classroom, offices, reception areas, breakrooms, workstations, conference, and meeting room will have designated Health and Safety stations. The Health and Safety stations will be stocked with the appropriate supplies to provide daily periodic cleaning and sanitizing.

Teachers, aides and staff will perform moderate cleaning and sanitation using soap and water and paper towels on frequently touched common surfaces and objects throughout the day, such as office workspaces and personal items, light switches, desks keyboards and desk accessories, break rooms, eating areas, copier stations, rest rooms and other shared spaces and items as indicated on the CCCOE Custodial Enhanced Cleaning Checklist, time permitting.

Night Cleaning

(Certified Custodial Technicians)

Cleaning and Sanitizing is performed with oversight: M-F approximately from 1:00pm -11:00pm.

We implemented footpaths and QR Codes/Reading, which incorporates cleaning tasks and accountability, to inform employee representatives of the frequency, location and scope of cleaning and sanitizing in classrooms, bathrooms, offices workspaces, meeting rooms, break rooms, reception areas and common areas throughout campuses and facilities.

Cleaning and sanitation involve water and soap or a detergent, this significantly decreases germs on surfaces and decreases infectious risks. "Disinfection" kills germs on surfaces using specific chemicals.

Frequent disinfection can pose a health risk to children and students due to the strong chemicals associated with the disinfection process and so it is not recommended in school settings unless a confirmed case of COVID-19 has been identified.

If a confirmed case of COVID-19 has been identified and reported, the space(s) where the case spent a large portion of their time (e.g., classroom, or administrator's office if an administrator) will be cleaned, sanitized, and disinfected utilizing electrostatic equipment as soon as possible according to the agencies COVID-19 cleaning protocols by trained and certified staff.

Routine cleaning and sanitation will be using soap and water or a mild detergent and color-coded microfiber hand towels, flat mops, and dust mops according to industry standard and methodologies. High Touch Surfaces (HTS) or Frequently Touched Surfaces (FTS) will be cleaned and sanitized daily: Door handles, light switches, push bars, bathroom and kitchen fixtures, student and teacher's desks, light switches, chairs, sinks, counter tops, appliance handles, horizontal surfaces, phone handles and all other surfaces accordingly per the agencies Custodial Enhanced Cleaning Checklist)

Playgrounds and outdoor equipment

If used, outdoor playgrounds/natural play areas only require routine maintenance. Make sure that children wash or sanitize their hands before and after using these spaces. When hand hygiene is emphasized, cleaning of outdoor structures play is not required between cohorts.

Hand Sanitizing

To implement effective hand sanitizing procedures, we will:

- Evaluate handwashing facilities.
- Determine the need for additional facilities.
- Encourage and allowing time for employee handwashing.
- Provide employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.

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 required physical distancing requirements are not feasible or maintained.

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:

- **Offered COVID-19 testing at no cost during their working hours.**
- **The information on benefits described in Training and Instruction, and Exclusion of COVID-19 cases, below, will be provided to them.**

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:

- In the event of possible COVID exposure or hazards, employees will communicate verbally (telephone, Zoom or MS Teams) or in writing (email or text) to their direct supervisor and the agency's HR COVID Communication email. Employees will be directed per CCHS Guidelines for monitoring or isolation due to exposure or hazard.
- Employees can report symptoms and hazards without fear of reprisal. All reports will be considered secure and confidential.
- The CCCOE will work in good faith with the employee to provide reasonable accommodations or leave options in the event of severe illness hazards or potential exposures. This could include, but is not limited to, approved remote work, paid leave per FFCRA, or AWOP.
- Employees will be provided the options to test onsite through Curative Testing, home test kit(s), CCHS or their health insurer. The latter options will require employees providing proof of test completion and negative COVID test results.
- 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.
- 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.

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.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - 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 voluntary wearing of face coverings.
- 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 recommended 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.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.

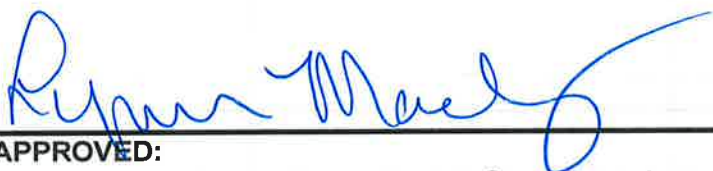
Reporting, Recordkeeping, and Access

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.

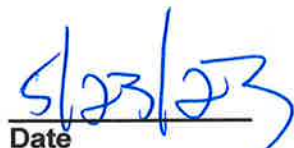
Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - The employee must isolate for at least five (5) days, with the first day starting after the date the employee first tested positive for COVID-19.
 - 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.
 - **A negative COVID-19 test will not be required for an employee to return to work on the sixth (6th) day so long as the above criteria have been met.**
- **If employee continues to have a fever, isolation should be continued until 24 hours after fever resolves without the use of fever-reducing medications.**



APPROVED:

Lynn Mackey, Contra Costa County Superintendent of Schools


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 encounter 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 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 that may include partitions/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 sanitizing (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Hand sanitizing solutions being used according to manufacturer instructions			
Posting of space occupancy limits			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Classroom#: <input type="checkbox"/> Hand sanitizer <input type="checkbox"/> Signage is sufficient and strategically placed <input type="checkbox"/> Cleaning Materials are available <input type="checkbox"/> Gloves are available <input type="checkbox"/> Masks are available <input type="checkbox"/> Room is decluttered <input type="checkbox"/> Clean/dirty bins are available <input type="checkbox"/> Individual student supplies are marked			

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, the exception being unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

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

Date:

Name of person conducting the investigation:

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):			

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

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 recommendation for close contacts to also be test. (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.)
 - 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.
 - [describe other applicable controls].

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

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

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections and COVID-19 Outbreaks-Notifications to the Local Health Department**.