



## **COVID-19 Prevention Program (CPP) for Black Pine Circle School**

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

**Date: January 29, 2021**

### **Authority and Responsibility**

Black Pine Circle School's Head of School, John Carlstroem, has overall authority and responsibility for implementing the provisions of this CPP in our school and 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, Berkeley Public Health, and Alameda County Department of Public Health 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.

### **Employee participation**

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: reporting any potential hazards that are seen in the school and/or workplace to their immediate supervisor, director of finance and operations, and/or head of school.

### **Employee screening**

All staff who are working on-site in any of our campuses and/or buildings (lower school, upper school, and administrative buildings) are required to complete the daily health screening for COVID-19 prior to coming to work. Staff complete the health screening using the ComplianceHR SmartScreen program and each employee has a link to the questionnaire that is unique to them. In addition, employees are required to temperature check prior to and/or upon arrival on-site. Non-contact thermometers are located on the lower school and upper school campuses, as well as the administrative buildings, including the Health Hub. A temperature of 100.4 degrees fahrenheit or above is considered a fever. The director of HR and campus health coordinator have access to the screening results, and will directly contact those who do not pass the health screening or temperature check. Any employee who is exhibiting symptom(s) of COVID-19 and/or has a fever is instructed to stay home and quarantine per CDPH guidelines.

In addition, staff working on-site participate in weekly COVID-19 surveillance testing.

## **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 hazard will be assessed by the head of school, director of finance and operations, and campus health coordinator.

Based on the severity of the hazard, a time frame for correcting the hazard will be assigned, and the individual responsible for correction will be identified.

The individual that is responsible for the correction will complete it within the time frame identified, and report the completion of the correction of the hazard to the head of school, director of finance and operations, and campus health coordinator.

The head of school, director of finance and operations, and campus health coordinator will follow up to ensure the correction was carried out and identify next steps if applicable.

## **Control of COVID-19 Hazards**

### **Physical Distancing**

Where possible, we ensure at least six feet of physical distancing at all times in our school and workplace by:

- Reducing the number of persons in an area at one time.
- Visual cues such as signs and floor markings to indicate 6-feet of distance and the direction of paths of travel.
- Reduced capacity of employees and students on campus to accommodate 6-feet of distance at all times - e.g. not all grades on campus daily, staggered schedules for on-campus learning.
- Utilizing outdoor space as much as possible to maximize physical distancing.
- Staggered break times.

Individuals will be kept as far apart as possible if a situation arises where 6-feet of physical distance cannot be achieved.

### **Face Coverings**

Black Pine Circle provides clean, undamaged face coverings and ensures they are properly worn by employees over the nose and mouth when indoors and/or outdoors. Disposable and cloth

face coverings, as well as face shields, are available at the Health Hub located in one of the administrative buildings. Masks are required to be worn at all times while on-site, both indoors and outdoors, when interacting with staff and/or students. All students K-8 are required to wear a mask at all times except when eating or drinking.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room with the ability to close the door.
- While eating and drinking at the workplace. Eating outdoors is strongly recommended and encouraged, while maintaining 6-feet of distance. Eating indoors is allowed provided employees are at least 6-feet apart and outside air supply to the area has been maximized to the extent possible.
- Alternatives to face coverings will be considered on a case-by-case basis for employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person.

### **Engineering controls**

We implement the following measures for situations where we cannot maintain at least six feet distance between individuals: The interaction would be time-limited and occur outdoors while following hand-hygiene procedures and wearing face coverings.

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

- Outdoor classrooms
- Updated filtering in furnaces to Merv-13
- Open doors and windows to increase airflow in classrooms and offices. Running air circulation in all systems.
- Installed air circulating HEPA/UV light air purifiers for rooms that do not have HVAC

### **Cleaning and disinfecting**

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

- Once a day thorough cleaning and sanitizing with janitorial service Wessne
- 3x a day our internal facilities staff clean and disinfect common areas and shared surfaces
- Employees are equipped with personal cleaning supplies to disinfect their personal workspace when needed - e.g. hand-sanitizer, sanitizing wipes/spray
- Frequent handwashing and/or hand-sanitizing procedures before and after touching frequently touched or shared surfaces/supplies

Should we have a COVID-19 case in our school and workplace, we will implement the following procedures: Cleaning and disinfecting of the area(s), classroom, and/or workspace where the positive individual spent significant time. A licensed outside cleaning service, such as Wessne, would be responsible for cleaning and disinfecting the areas, overseen by our facilities manager. Any materials and equipment used by the positive individual would be cleaned and disinfected per guidelines.

### **Shared tools, equipment, and personal protective equipment (PPE)**

Personal protective equipment, such as masks, gloves, and face-shields must not be shared.

Items that staff 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 employee should handwash and/or hand-sanitize prior to handling the item and immediately afterwards. The item will also be disinfected in between uses either by the employee who used the item or the facilities crew.

## **Hand hygiene**

In order to implement effective hand sanitizing procedures, we:

- Evaluated our current handwashing and hand-sanitizing facilities.
- Determined a need for additional handwashing and hand-sanitizing stations.
- Provided additional handwashing and hand-sanitizing stations on the lower school and upper school campuses.
- Provided employees and students with an effective hand sanitizer that is easily accessible to their area.
- Encourage employees and students to wash their hands for at least 20 seconds each time.
- Allow time every hour for employee and student handwashing.
- Equipped every teacher that is working with students with a personal hygiene kit that contains hand sanitizer for their personal use.

## **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.

## **Investigating and Responding to COVID-19 Cases**

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

Employees who have potential COVID-19 exposure in our workplace will be:

- Offered COVID-19 testing at no cost to the employee during their working hours
- Eligible for 80-hours of emergency paid sick leave for COVID-19 related reasons, including exposure to COVID-19 and/or exhibiting symptoms

## **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, via the daily ComplianceHR link, available to each individual to complete prior to arrival on campus
- That employees can report symptoms and hazards without fear of reprisal
- Our procedures and/or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness and/or who are protected under the ADA
- Where testing is not required, how employees can access COVID-19 testing in the workplace and in the community

Outside of the scheduled testing offered on-site, employees are provided information to access free testing through city/county resources.

- 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 provide 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 provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards and to mitigate risks when working on-site
- Information regarding COVID-19 related benefits to which the employee may be entitled to under federal, state, or local laws
- Methods of physical distancing to achieve at least 6-feet and the importance of combining physical distancing with face coverings and other hygiene measures
- The fact that physical distancing must be combined with other controls, such as face coverings and hand hygiene, in order to reduce the risk of transmission of COVID-19
- The importance of frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing is not feasible
- The proper use of face coverings and that the primary purpose of face coverings is to protect other individuals from the wearer of the face covering
- 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
- COVID-19 symptoms, the importance of participating in weekly surveillance testing, and not coming to work if the employee has COVID-19 symptoms

## **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
- 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 have demonstrated that the COVID-19 exposure is work related. This will be accomplished by using emergency paid sick leave under the FFCRA. In the event that emergency paid sick leave is not available to the employee, we will provide resources to obtain information about leave rights, disability payments through the state due to COVID-19
- 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 school and workplace to employees 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 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 100F 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 upon completion of appropriate quarantine/isolation precautions
- 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.

John Carlstroem, Head of School

{Insert John's signature and date here}

## 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, check-in areas, waiting areas, and classrooms.

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, students and/or families, 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:**

<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>			
Outdoor tents/canopies			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Hand sanitizing stations (adequate numbers and supplies)			
Social distancing markers and one-way paths			
Sanitizing wipes available with each classroom			

<b>PPE</b>			
Face coverings (disposable and cloth)			
Gloves			
Face shields			
Gowns (if needed)			

## Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing provided through the school will be conducted 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:**

<p><b>Employee (or non-employee*) name:</b></p>		<p><b>Occupation (if non-employee, why they were in the workplace):</b></p>	
<p><b>Location where employee worked (or non-employee was present in the workplace):</b></p>		<p><b>Date investigation was initiated:</b></p>	
<p><b>Was COVID-19 test offered?</b></p>		<p><b>Name(s) of staff involved in the investigation:</b></p>	
<p><b>Date and time the COVID-19 case was last present in the workplace:</b></p>		<p><b>Date of the positive or negative test and/or diagnosis:</b></p>	
<p><b>Date the case first had one or more COVID-19 symptoms:</b></p>		<p><b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b></p>	

<p style="text-align: center;"><b>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):</b></p>	
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<p><b>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:</b></p>		
<p><b>All employees who may have had COVID-19 exposure and their authorized representatives.</b></p>	<p><b>Date:</b></p>	
	<p><b>Names of employees that were notified:</b></p>	
<p><b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b></p>	<p><b>Date:</b></p>	
	<p><b>Names of individuals that were notified:</b></p>	

<p><b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b></p>		<p><b>What could be done to reduce exposure to COVID-19?</b></p>	
<p><b>Was local health department notified?</b></p>		<p><b>Date:</b></p>	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.