COVID-19 Prevention Program (CPP)

February 15, 2023
COVID-19 Prevention Program (CPP) for the Oroville Union High School District

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

Date: August 10, 2022

Authority and Responsibility

Superintendent Dr. Corey Willenberg 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:

- 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.
- Ongoing evaluation of 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 and their bargaining units are encouraged to participate in the identification and evaluation of COVID-19 hazards. Both labor unions (CSEA and OSTA) met and developed Memorandums of Understanding to develop safety protocols.

Employee Screening

All staff are required to self-screen for symptoms prior to arriving at work. A Daily Wellness Checklist is available on the District website along with a COVID-19 Exposure information sheet provided by the Butte County Public Health Department. All teachers and administrators are provided with or have access to a touchless thermometer. Staff who test positive for COVID-19 and are asymptomatic are required to quarantine as required by the CDC and CDPH. Families are strongly encouraged to monitor their children for signs of infectious illness every day and keep sick children at home.
The California Department of Health requires unvaccinated employees to be tested weekly. Students
are not required to be tested, regardless of their vaccination status. The State of California has not
required students to be vaccinated when the vaccine becomes available. Staff and students will be
reminded to wash their hands frequently and use hand sanitizer when entering classrooms and common
areas when handwashing sinks are not available.

Parents have been informed about COVID-19 symptoms and are expected to keep their student home if
they are feeling ill or have been exposed to someone who has tested positive.

Custodians will sanitize classrooms on a daily basis. Additional staff who have been trained to use
district-approved disinfectants may also clean restrooms, desks or frequently touched surfaces, such as
door knobs, throughout the day.

Students cannot help with cleaning under any circumstance. Schedules of custodial staff may be
adjusted as necessary to meet the demand of disinfecting schools while students and staff are present.
Hand sanitizing dispensers are installed in all classrooms where soap and water is not available and in
targeted areas throughout the schools.

HVAC fans will be run continuously, regardless if doors and windows are open, and filters will be
changed regularly.

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 hazard. Jim
LaGrone, Director of Facilities, Information Technology and Transportation, will coordinate with
school and district staff to identify and correct COVID-19 Hazards.

Control of COVID-19 Hazards

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

• Posting social distancing signs around campuses and offices to remind staff, students and visitors to
  stay six feet apart.
• When social distancing cannot be achieved, individuals are kept as far apart as possible.

Face Coverings
OUHSD does not currently require staff, students or visitors to wear masks or face coverings but will
make them available upon request at no cost.

Engineering Controls
The following measures will be implemented for situations where we cannot maintain at least six feet
between individuals:

• Hand sanitizing supplies are provided throughout the building for all staff and visitors.
• Plexiglas shields are provided for the front reception area and any other area as requested by
employees and/or where close working conditions exist.
We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- Setting ventilation systems to bring in 15% of outside air to the interior at all times.
- Checking and managing ventilation systems on a regular basis by the Maintenance Department.
- Using MERV-13 filters or equivalent in all existing heating and cooling units.

**Cleaning and Disinfecting**

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

- Custodians have been provided all necessary supplies and clean all occupied areas throughout the district nightly.
- Other staff are trained in the proper use of disinfectants to clean frequently touched hard surfaces throughout the day.

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

- Immediately clear the room or office of personnel and/or students. Custodians or Universal Support Staff will clean and disinfect the applicable work areas prior to reopening for use.

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

PPE must not be shared (e.g., gloves, goggles and face shields). Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by staff trained on the use of district-approved disinfectants.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users. When the sharing of vehicles cannot be avoided, occupants must wear masks and sit as far apart as possible. Windows should be open to maximize air flow.

**Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Provide hand sanitizing stations where soap, water and a hands-free drying method (air dryer or Hands-free paper towels) are not available.
- Encourage and allow time for employee handwashing.
- Provide hand sanitizer that contains at least 70% alcohol. Hand sanitizers that contain methanol (i.e. methyl alcohol) are prohibited.
- Encourage employees to wash their hands for at least 20 seconds.

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

The District evaluates 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.
The District evaluates the need for respiratory protection in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

The District provides and ensures 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. Employees who had potential COVID-19 exposure in our workplace will be:

- Provided resources on available COVID testing sites in the area.
- Provided information on sections described in Training and Instruction, and Exclusion of COVID-19 Cases.

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 includes the following information:

Positive Student Case or Exposure

- The Principal must be notified immediately if a student has tested positive or has had close contact with someone who has tested positive.
- The parent/guardian will be sent a link to a Google form, which goes directly to the School Nurse. The form will include the student’s demographic information, when they tested positive or were exposed, whether they have symptoms, and anyone who they have been in close contact with.
- The student will remain home until the School Nurse provides direction via email to the school and parent/guardian on possible quarantine or when the student may return to school.
- The School Nurse will do contact tracing for anyone who was reported as a close contact.
- If a student tests positive while at school, the student will be sent immediately to an isolation room and their parent/guardian will be contacted. The parent may choose for their child to drive themselves home or have the student remain in the isolation room until they can be picked up.

Positive Staff Case or Exposure

- Any staff member who has tested positive or has had close contact with someone who has tested positive must immediately notify their supervisor and the Human Resources department.
- The staff member will leave their work site immediately and will be required to fill out a Google form, which goes directly to the School Nurse. The form will include the staff member’s demographic information, when they tested positive or were exposed, whether they have symptoms, and anyone who they have been in close contact with.
- The staff member must remain at home until they receive direction from the School Nurse via email on possible quarantine or when they may return to work. The School Nurse will also relay this information to the staff member’s supervisor and the Human Resources department.
- The School Nurse will do contact tracing for anyone who was reported as a close contact.
• The School Nurse will email a notification letter to the school, who will forward the letter to all student’s parent/guardian and staff members who were in a classroom with a student who tested positive.

Employees may report symptoms and hazards without fear of reprisal. If the employee feels they have been retaliated against they should report the incident to the Human Resources department.

• Any employee with medical or other conditions that put them at increased risk of severe COVID-19 illness will have an interactive process meeting with the Human Resources department to determine if accommodations can be made. The employee is required to provide medical documentation of their limitations. In the event that accommodations cannot be made, the employee may work from home if possible as determined by administration. If not possible, the employee may request a leave of absence.

A COVID-19 Information page is provided on the District website, which provides the following:

- Dashboard
- Learning Continuity and Attendance Plan
- ESSER III Plan
- COVID FAQ’s
- Vaccine Mandate FAQ’s
- COVID-19 Prevention Program
- Daily Wellness Checklist
- Local Testing Locations
- What to do if You’ve been Exposed Information
- COVID-19 Prevention Information
- BCPH Health Resources
- BCPH Vaccine Information
- CDC COVID-19 Virus Information Video
- Forms

Training and Instruction

OUHSD has provided effective training and instruction that includes:

• Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
• Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, or bargaining unit MOU’s.
• Facts regarding COVID-19:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
• Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
• The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
• The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
• Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Face coverings are intended to primarily protect other individuals from the wearer of the face covering.
• COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

Exclusion of COVID-19 Cases

If we have a COVID-19 case in our workplace, we will limit transmission by:
• Excluding staff who test positive for COVID-19 from the workplace until return-to-work requirements are met.
• Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever it is determined that the COVID-19 exposure is work related
• Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:
• The School Nurse will report positive cases to the Butte County Health Department whenever required by law as well as 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
• Staff who test positive for COVID-19 and are experiencing symptoms will not return to work until they are cleared by the School Nurse.
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:

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

Date:
Name of person conducting the inspection:
Work location evaluated:

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<tr>
<td>Barriers/partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<td>Additional room air filtration</td>
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<td><strong>Administrative</strong></td>
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<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<td>Hand washing facilities (adequate numbers and supplies)</td>
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<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<td><strong>PPE (not shared, available and being worn)</strong></td>
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<td>Face coverings (cleaned sufficiently often)</td>
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<td>Gloves</td>
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<td>Face shields/goggles</td>
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<td>Respiratory protection</td>
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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:

<table>
<thead>
<tr>
<th>COVID-19 Case Investigation Information</th>
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<tbody>
<tr>
<td><em><em>Employee (or non-employee</em>) name:</em>*</td>
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<tr>
<td><strong>Location where employee worked (or non-employee was present in the workplace):</strong></td>
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<tr>
<td><strong>Was COVID-19 test offered?</strong></td>
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<tr>
<td><strong>Date and time the COVID-19 case was last present in the workplace:</strong></td>
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<tr>
<td><strong>Date the case first had one or more COVID-19 symptoms:</strong></td>
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</table>
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):

<table>
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<tr>
<th>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:</th>
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<tr>
<td><strong>All employees who may have had COVID-19 exposure and their authorized representatives.</strong></td>
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<td><strong>Date:</strong></td>
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<tr>
<td>Names of employees that were notified:</td>
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<td><strong>Independent contractors and other employers present at the workplace during the high-risk exposure period.</strong></td>
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<td><strong>Date:</strong></td>
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<td>Names of individuals that were notified:</td>
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<tr>
<td><strong>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</strong></td>
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<tr>
<td><strong>What could be done to reduce exposure to COVID-19?</strong></td>
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<td><strong>Was local health department notified?</strong></td>
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<td><strong>Date:</strong></td>
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*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:

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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Multiple COVID-19 Infections and COVID-19 Outbreaks

COVID-19 Testing

• In the event of multiple infections or an outbreak, the School Nurse will notify BCPH. The district will follow all CDC and CDPH recommendations.

Exclusion of COVID-19 Cases

We will ensure that employees who tested positive for COVID-19 or were exposed to COVID-19 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.