

# COVID-19 Prevention Program (CPP)

## Nevada City School of the Arts

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

**Date:** 03/10/2022

### Authority and Responsibility

Holly Pettitt, School Director 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 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 by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, 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.
- 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.

Protocols, actions, and template communications are in place for the following COVID-19 related scenarios.

1. A student or staff member either exhibits COVID-19 symptoms, answers yes to a health screening question or has a temp of 100.4 or above.
2. A family member or someone in close contact with a student or staff member tests positive for COVID-19.
3. A student or staff member tests positive for COVID-19.
4. A student or staff member tests negative for COVID-19 after any of the reasons/ scenarios a, b, or c

NCSA staff will continuously evaluate the risk of COVID-19 hazards by monitoring traffic flow and number of people in each room. Additionally, NCSA has asked admin support staff that can fulfill their job description by working remotely, to do so to minimize the exposure risks on campus.

### **Employee Participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

All employees are trained to look for signs of symptoms in others on campus by monitoring for symptoms, and by ensuring everyone who comes to campus has completed the COVID-19 Daily Health Screening questionnaire. If they have not completed the questionnaire, NCSA staff can do it themselves on site, or other staff can conduct the screening.

### **Employee Screening**

We screen our employees and respond to those with COVID-19 symptoms by:

All employees who report to work (in-person) are required to perform a self-administered wellness check for COVID19 symptoms before arriving at work. Employees who have a fever of 100.4 degrees Fahrenheit or higher and/or any of the COVID symptoms will be directed to remain home, notify his or her supervisor and await instructions and a contact from the COVID Coordinator or designated staff. If there is follow up needed, we have trained staff who will contact employees to do additional contact tracing/health screening.

### **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:

- Designated staff will notify the COVID Coordinator of possible exposure immediately.
- Investigate the COVID-19 illness and exposures and determine if any work-related factors could have contributed to risk of infection.
- COVID Coordinator or designated staff will notify the county public health department immediately, if a positive case has been verified on campus. Human Resources will also be notified to report the case the workers comp.
- COVID Coordinator or designated staff will notify any staff or students/families that may have had direct exposure with any positive COVID-19 case while maintaining confidentiality as required by state and federal laws.
- NCSA will close off any areas used by any sick person and will not use them for 24 hours or before cleaning and disinfecting.
- Update protocols as needed to prevent further cases in accordance with CDPH Guidelines ("Responding to COVID-19 in the Workplace").

- Implement communication plans for exposure at school and potential school closures to include outreach to students, parents, teachers, staff and the community.
- Include information for staff regarding labor laws, information regarding Disability Insurance, Paid Family Leave and Unemployment Insurance, as applicable.

## **Controls 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).

Beginning March 11, masks will no longer be required for all workers indoors, but will be strongly recommended for all individuals in most indoor settings. Employers must still provide a face covering upon request of an employee or student.

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, non-restrictive 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:

We have either installed or purchased portable sneeze guards that can be used where necessary. In addition, we have partitions set up in larger areas to separate groups of students.

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

We have installed MERV 13 filters in our school buildings that are changed on a regular schedule and changed more often when air quality is poor. We have increased the fresh air flow by installing opening windows where possible. We have also installed iWave air cleaners in our HVAC units that purifies the air through bi-polar ionization.

### **Cleaning and disinfecting**

We implement the following cleaning and disinfection measures for frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, phones, headsets, bathroom surfaces, and steering wheels:

NCSA will meet cleanliness standards as outlined by the CDE and the CDPH prior to reopening and will maintain this high level of cleanliness throughout the school year. In accordance with CDC and CDPR guidance, and in consultation with local public health officials, staff will implement correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning.

Disinfecting of surfaces between uses may include, but is not limited to: desks, tables, chairs, keyboards, headsets, and copy machines.

High touch surfaces will be disinfected frequently and at least daily. High-touch surfaces may include, but are not limited to: door handles, rails, sink handles, restroom surfaces, games, art supplies, and instructional materials.

Use of shared materials will be limited as much as practicable. Students are assigned personal school materials and supplies, may include, but are not limited to: pencils, pens, colored pencils, markers, rulers, water bottles, and fidget items.

Selected disinfecting products will be approved for use against COVID-19 on the Environmental Protection Agency (EPA) List N: Disinfectants for Use Against SARS-CoV-2.

When using these disinfecting products, label directions for appropriate dilution rates and contact times will be followed. Disinfecting and airing out the space will occur before students arrive and after students leave. Thorough cleaning and disinfecting will occur when children are not present.

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

Areas used by any person who has been identified with a positive COVID case, will be closed off and not used before completion of cleaning and disinfection by NCSA Custodians. To reduce risk of exposure, if possible, a wait time of 24 hours will be implemented before cleaning and disinfecting. When not possible to wait 24 hours, a wait time as long as practicable will be implemented.

### **Hand sanitizing**

To implement effective hand sanitizing procedures, we:

Routine hand washing, will occur more frequently with scheduled times throughout the day for both staff and students. Student hand washing will be implemented one-student at a time.

Students and staff will wash hands upon arrival and exit transitions on campus/within the classroom, as well as, scheduled times posted throughout the day, often coordinated with transitions times in/out of the classroom, such as, PE, recess, or lunch times.

### **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.

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 the **Appendix C: Investigating COVID-19 Cases** form.

We also ensure the following is implemented:

We have enrolled in the CDPH testing program through Primary Health allowing all employees and students free rapid and PCR COVID-19 testing.

### **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:

COVID-19 Prevention Program

- Who employees should report COVID-19 symptoms, possible close contacts and hazards to, and how.

NCSA has hired a COVID Coordinator that is in constant communication with the School Nurse to ensure that they are updated and trained to understand COVID-19 symptoms and possible hazards. Employees are instructed to notify this coordinator or designated staff when they have symptoms or exposure.

- That employees can report symptoms, possible close contacts and hazards without fear of reprisal.
- How employees with medical or other conditions that put them at increased risk of severe COVID-19 illness can request accommodations.

Nevada County Superintendent of Schools has also opened up a testing center for symptomatic only staff to be tested, in addition to establishing a school staff only testing time designated by our local healthcare center Western Sierra Medical Center.

- Access to COVID-19 testing when testing is required.

We have addressed this issue above.

- The 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.

Safety protocols and equipment are regularly reviewed and updated as needed and protocols are addressed in our Injury Illness and Prevention Plan (IIPP).

## **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.

NCSA has required staff to complete the Coronavirus: Cleaning and Disinfecting Your Workplace and other hazard trainings through SafeSchools. All training was completed within the first six weeks of the beginning of the school year or being hired. Additionally, we do procedural updates, trainings, and/or reminders at staff meetings and through email messages as necessary.

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

### **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.
  - For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by

NCSA will follow all Department of Labor laws to ensure that our staff are covered during COVID-19. Most employees will be able to work from home during any quarantine or home isolation period, and if necessary, all benefits through the Families First Coronavirus Response Act will be available.

- 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 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 the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases.

**Return-to-Work Criteria**

- **COVID-19 cases with symptoms** will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 °F. or higher has resolved without the use of fever-reducing medications, and
  - COVID-19 symptoms have improved, and
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- **COVID-19 cases who tested positive but never developed 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 once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met.
- Persons who had a close contact may return to work as follows:
  - Close contact but never developed symptoms: when 10 days have passed since the last known close contact.
  - Close contact with symptoms: when the “cases with symptoms” criteria (above) have been met, unless the following are true:
    - The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
    - At least 10 days have passed since the last known close contact, and
    - The person has been symptom-free for at least 24 hours, without using fever-reducing medications.
- If an order to isolate, quarantine, or exclude 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.

Holly Pettitt, School Director

03/10/2022

**Title of Owner or Top Management Representative**

**Signature**

**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 come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, trainings, 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 stationary work.

**Person Conducting the Evaluation:**

**Date:**

**Name(s) of Employees 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</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>			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Administrative</b>			
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			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>PPE</b> (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Face shields/goggles			
Respiratory protection			

\*Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent

feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

## **Appendix C: Investigating COVID-19 Cases**

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

**Date:**

**Name of Person Conducting the Investigation:**

**Name of COVID-19 case (employee or non-employee\*) and contact information:**

**Occupation (if non-employee\*, why they were in the workplace):**

\*If we are made aware of a non-employee COVID-19 case in our workplace

**Names of employees/representatives involved in the investigation:**

**Date investigation was initiated:**

**Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed:**

**Date and time the COVID-19 case was last present and excluded from the workplace:**

**Date of the positive or negative test and/or diagnosis:**

**Date the case first had one or more COVID-19 symptoms, if any:**

**Information received regarding COVID-19 test results and onset of symptoms (attach documentation):**

**Summary determination of who may have had a close contact with the COVID-19 case during the high- risk exposure period. Attach additional information, including:**

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
  - They were fully vaccinated before the close contact and do not have symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a Close Contact requirements.
- The names of those exempt from exclusion requirements because:
  - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
  - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

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:

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

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?

**Appendix D: COVID-19 Training Roster**

**Date:**

**Person that conducted the training:**

Employee Name	Signature

**Appendix E: Documentation of Employee COVID-19 Vaccination Status – CONFIDENTIAL**

Employee Name	Fully or Partially Vaccinated <sup>1</sup>	Method of Documentation <sup>2</sup>

<sup>1</sup>Update, accordingly and maintain as confidential medical record

<sup>2</sup>Acceptable options include:

- Employees provide proof of vaccination (vaccine card, image of vaccine card or health care document showing vaccination status) and employer maintains a copy.
- Employees provide proof of vaccination. The employer maintains a record of the employees who presented proof, but not the vaccine record itself.
- Employees self-attest to vaccination status and employer maintains a record of who self-attests.