

## COVID-19 Prevention Program (CPP) for **The Bay School, Santa Cruz, CA**

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 19) that may occur in our workplace.

**Date:**

### **Authority and Responsibility**

**Andrea Gold, Executive 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 will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Document the vaccination status of our employees which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Policies and procedures are in alignment with state and local public health requirements.
- 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 unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- Appendix B: COVID-19 Inspections form
- Self-Screening for students and employees
- Vehicle Inspection and Cleaning Checklist
- High Touch Point Checklist

### **Employee participation**

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Voicing any COVID-19 related concerns including identifying potential hazards to the Executive Director.
- Employees can also call 888-664-9870 or email the May Institute Compliance Helpline [compliance@mayinstitute.org](mailto:compliance@mayinstitute.org).
- Employees can also call the Santa Cruz Health Services Agency at [831-454-4000](tel:831-454-4000).
  - The School Support Coordinator or designee will conduct inspections monthly utilizing the Appendix B: COVID-19 Inspections form.

### **Employee screening**

We request that all employees:

- Conduct a self-screening one hour prior to the start of the workday.

## 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 School Support Coordinator or designee will conduct inspections monthly utilizing Appendix B COVID-19 Inspections form to identify hazards and track corrections in a timely manner.

If a hazard is identified that puts the school's safety in jeopardy, immediate action will be taken by the School Support Coordinator. Follow up for other items will be completed within the two weeks prior to the next inspection. If the two week timeline is not feasible, alternative timelines will be determined and documented as appropriate.

## Control of COVID-19 Hazards

### Face Coverings

We provide clean, undamaged Surgical Masks and KN95/N95 Respirators and ensure they are properly worn by employees over the nose and mouth where and when required by orders from the California Department of Public Health (CDPH) or local health department.

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

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- How the ventilation system will be properly maintained and adjusted, whether you own and operate the building, or not.
- Whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.

Natural ventilation when possible, given no hazards exist in the environment (re: smoke from wildfires)

HVAC systems:

- Installed MERV 13 filters in the HVAC Systems where possible. MERV 13 filters have 90 percent efficiency on particles that are 3 to 10 micrometers in size.
- Clean and disinfect all evaporator coils with a hospital grade coil cleaner.
- Checked that all the outside air dampers are working properly so we can make sure the HVAC systems are supplying the building with the maximum outside air possible for the unit.
- Checked that the general and toilet exhaust fans are working properly and scheduled to run when the building is occupied.
- Changed the settings for HVAC equipment to have the supply air fans run constantly throughout the day. This provides maximum air circulation.
- Applicable orders and guidance from the State of California and your local health department related to COVID-19 hazards and prevention, including CDPH's Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.

## **Cleaning and disinfecting**

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

- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- TBS has a supply of cleaning supplies for approximately two month to ensure ongoing cleaning, sanitization and disinfection occurs on a regular basis.
- Cleaning services include daily wipe down and disinfecting of high touch points.

## **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Handwashing facilities- all employees and individuals served will have access to handwashing stations equipped with soap, running water and paper towels. Handwashing should occur during, but is not limited to:
  - Upon entry into and exit from the program space;
  - When coming into the program space from outside activities;
  - Before and after eating;
  - After sneezing, coughing or nose blowing;
  - After toileting and diapering;
  - Before handling food;
  - After touching or cleaning surfaces that may be contaminated;
  - After using any shared equipment like toys, computer keyboards, computer mouse;
  - After assisting individual with handwashing;
  - Before and after administration of medication;
  - Before entering vehicles used for transportation of individual;
  - After contact with surgical mask, respirator or cloth face covering; and
  - Before and after changes of gloves.

If access to handwashing station (soap, running water and paper towels) is not available all employees and individuals will have access to effective hand sanitizer (with a minimum of 60 percent ethyl-alcohol) to clean their hands. Hand sanitizers that contain methanol (i.e. methyl alcohol) is prohibited.

## **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.

We provide surgical masks or respirators to all employees as needed.

## **Testing of symptomatic employees**

We make COVID-19 testing available at no cost to all employees who had close contact in the workplace and have COVID-19 symptoms, during employees' paid time.

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

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms.

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

- Notified within 24 hours in a manner that does not jeopardize the COVID-19 case's confidentiality.
- Provided with a list of testing locations and ensured the opportunity to take a COVID-19 test during work hours at no cost to the employee.
- Provided with applicable information regarding COVID-19 related benefits the employee may be entitled to under federal, state, or local laws.
- Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, except for COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to these employees.
- Written notice within one business day of our knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers on the premises at the same worksite as the COVID-19 case during the high-risk exposure period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c).
- We consider a "close contact" that meets the definition as described in section 3205(b)(1) definition; "high-risk exposure period" meets the section 3205(b)(10) definition; and "worksite" meets the section 3205(b)(12) definition]

## **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:

- Employees will report all COVID-19 symptoms and possible hazards to Human Resources. Employees perform a self-screening each morning before entering the school. If any symptoms are present, the employee will not come on-site. A follow-up call will be made by Human Resources to the employee to determine next steps and an appropriate timeline for the employee to return to the school.
- Employees will report symptoms and hazards without fear of reprisal. The Bay School has an anti-retaliation policy that protects employees from retaliation and discrimination. All concerns will be investigated thoroughly and confidentially.
- If an employee has a medical (or other) condition that puts them at increased risk of severe COVID-19 illness, we will enter the interactive Accommodation process. The employee will submit an Accommodation request. The Bay School will make every effort to accommodate any reasonable request or accommodation.
- When testing is not required, employees will be referred to the Bay School list of local testing sites. Human resources will notify employees via email of any changes made to the list. The list will be updated weekly to ensure accuracy.
- 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 will work with all employees to schedule a COVID-19 test during working hours at no cost to the employee. The employee will receive

information on COVID-19 benefits to which the employee may be entitled under applicable Federal, State, and Local law.

- The Bay School will share Information about COVID-19 hazards that 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.
- We are sharing information on an ongoing basis with employees about washing hands, social distancing, face coverings, PPE, s/s of COVID19, respiratory droplets, COVID19, infection control, flu vaccination education, COVID19 vaccination education, etc.
- Organizationally, we are monitoring all positive COVID-19 cases, tracking COVID-19 compliance and infection control. We are reviewing and analyzing the data on an ongoing basis to identify trends and areas for improvement. Our number one goal is to stop the spread and maintain a safe environment for all we serve and employ.

## 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.
- 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 must be combined with other controls, including face coverings and hand hygiene, to be effective.
- 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 - face coverings are intended to primarily protect other individuals from the wearer of the face covering. 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.

All employees will be provided training on

- Information about COVID-19, including how the illness is spread, how to prevent its spread, signs and symptoms, how to reduce infection and when to seek medical assistance for sick individuals or employees.
- Self-screening at home
- Temperature checks
- Importance of not coming to work if ill
- When to seek medical attention if symptoms become severe
- Which underlying health conditions may make individuals more susceptible to contracting and suffering from a severe case of the virus
- Disinfecting and cleaning
- Effective handwashing and assisting individuals washing their hands; Programs will post visual steps of appropriate handwashing to assist individuals
- PPE: Face masks, cloth face covers, gloves, gowns, face shields and goggles
- Employees are trained on the hazards of the cleaning chemicals used in the workplace in accordance with Occupational Safety Hazard Administration (OSHA)'s Hazard Communication standard (29 CFR 1910.1200). Safety Data Sheets (SDS) sheets are available at all locations via MSDS Online Search.
- At a minimum, all employees must immediately notify their supervisor and the local health department if they develop symptoms of COVID-19. The health department will provide guidance on what actions need to be taken.
- A communication system is in place for employees and families for self-reporting of symptoms and notification of exposures and closures.
- Policies and SOP's are in place for employees and employee training is provided on these, as necessary.

**COVID-19 Training Roster** maintained on site.

## **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. Policies and procedures are in alignment with state and local public health requirements.
- 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. If the employee is asymptomatic and we have available work, we will provide the employee's pay and benefits. When not covered by Workers Compensation, we may require the employee to exhaust paid sick leave if they are not able to work, to the extent permitted by law, and may offset payments by the amount an employee receives in other benefit payments.
- 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.
- 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.

- Maintain an up-to-date record of surveillance testing, which will include the schedule for staff testing, staff appointment dates, and staff test results.

### **Return-to-Work Criteria**

- We follow current CDC guidelines, orders from the California Department of Public Health (CDPH), and/or local health department to determine when an employee may return to work.
- Policies and procedures are in alignment with state and local public health requirements.

**Pam Raymond, Senior Vice President**

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Appendix B: COVID-19 Inspections – **Completed forms maintained on site**

Date: **[enter date]**

Name of person conducting the inspection: **[enter names]**

Work location evaluated: **[enter information]**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Entry Protocols</b>			
Contact Log is present and available for contact tracing.			
Semi private screening station is present and contains adequate supplies at entrance.			
Student health screenings are completed (review a 25% sample of individuals on site during review)			
Employee health screenings are completed (review a 25% sample of employees on site during review).			
<b>Information, Signage, Postings</b>			
Handwashing, social distancing, PPE, symptom information as well as other reminders and educational signage is place appropriately throughout the building.			
Contact information for the local Department of Public Health is posted in a prominent location at the site.			
Compliance posting: Compliance line/email information is posted in a prominent location at the site.			
COVID-19 Binder is present at the location and contains: COVID Prevention Plan (CPP), Communication Plan, and other written protocols.			
Employees have completed the COVID-19 Learning Plan (review a 25% sample of employees on site during review).			
Interview: Employee selected can identify what the COVID Binder is and where it is located.			
<b>Engineering</b>			

Barriers/partitions – installed as appropriate.			
MERV 13 filters have been installed and changed when appropriate.			
General and toilet exhaust fans are working and running when the building is occupied.			
Windows/doors will be opened when appropriate to increase air circulation.			
<b>Social Distancing</b>			
All persons, including employees, customers, and vendors are at least six feet apart to the greatest extent possible, both inside and outside workplaces.			
Shared office space allows for social distancing; staggered schedules, use of alternative spaces or barriers where appropriate.			
Where appropriate, markings on the floor indicate where to wait for social distancing.			
Isolation space identified and clearly labeled; a form of communication is available for emergency services; minimal items are present in the room (chair and/or cot)			
<b>Hygiene and Cleaning Protocols</b>			
Hand sanitizer is placed appropriately throughout the space and is adequately supplied.			
Hand sanitizer is used according to manufacturer instructions.			
Bathrooms contain running water and an adequate amount of soap and paper towels.			
Employees are observed engaging in hand hygiene.			
Regular disinfection of high touch areas, such as workstations, equipment, screens, doorknobs, light switches, restrooms throughout work site are completed.			
Adequate supply of cleaning and disinfection products (disinfecting wipes or spray and paper towels) are available throughout the workplace.			
A stockpile of cleaning and disinfection products are stored on site for use.			
Electrostatic devices available for use for the programs (stored centrally at the office, school or day program).			
Electrostatic cleaning solution is available for use at the programs and stored appropriately.			
Cleaning and disinfecting products are being			

used according to manufacturer instructions.			
<b>PPE</b>			
All employees are wearing the required surgical masks or respirators appropriate for the setting.			
All employees are wearing the required surgical masks or respirators correctly.			
A supply of surgical masks or respirators are available at the workplace for employees.			
A supply of gloves are available throughout the workplace for employees.			
Gloves are stored and disposed of according to programmatic protocols.			
An adequate stockpile of PPE is stored on site for use (surgical masks, gloves, face shields, gowns, etc.,)			
Employees are using PPE according to the SOP for PPE			
PPE is not shared			

**Appendix D: COVID-19 Training Roster – Updated roster maintained on site**