

Whittier Christian High School



Covid-19 Prevention Plan **(CPP)**

Last Revision: 2-1-2021

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

Authority and Responsibility

The Chief Operating Officer has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at or who may enter our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by 1) Distributing **Appendix A** to all staff and encourage completing the form when a hazard is identified. 2) Establishing an open-door policy for employees to address any concerns of potential hazards at work with a member of the Administration or the COVID-19 coordinator.

Employee screening

We screen our employees by 1) Directly screening employees when they arrive at work with temperature checks using non-contact thermometers and a symptom review, 2) Employees attest to not having any COVID-19 symptoms, 3) Ensuring that face coverings are used during screening by both screeners and employees

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices, or procedures will be documented on **Appendix B: COVID-19 Inspections** form and corrected in a timely manner based on the severity of the hazards, as follows:

1) Hazards identified by periodic inspections (**Appendix B**) or workplace-specific evaluations (**Appendix A**) will be reviewed immediately by the Safety Committee member to assess the severity and channeled to appropriate personnel to be corrected accordingly in a timely manner. **Appendix B** will be completed and sent to the Safety Committee to ensure correction of hazards and follow-up if necessary.

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:

- Arranging classroom seating assignments; spacing desks/chairs 6ft apart
- Using plexiglass partitions at the workspace
- Modifying activities to eliminate large gatherings
- Reducing indoor eating areas and breakrooms; creating outdoor eating areas
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

We allow the use of clean cloth masks and provide new, disposable face coverings for all employees if necessary. We ask all employees to keep each other accountable to ensure masks are properly worn over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Masks are available in each classroom, school offices, and throughout campus, accessible to anyone who may need one.

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

- When an employee is alone in a room.
- While eating and 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 possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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. Alternatives will be considered on a case-by-case basis.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

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

- Doors are kept open when possible, and HEPA filter air purifiers are utilized where necessary.
- Contracted HVAC company tested the air balance throughout the facility prior to school opening.
- Contracted HVAC company maintains and adjusts the ventilation system periodically to allow the maximum amount of outside air as possible.
- All HVAC filters were upgraded to MERV 13 rating and are changed every four months.

Cleaning and disinfecting

We implement the workplace cleaning and disinfection measures and disinfection of frequently touched surfaces as described in the WCHS COVID-19 Preparedness and Response Plan:

- Adequate supplies and time are provided for cleaning and disinfection to be done thoroughly and

- properly.
- Cleaning schedules and assignments are created for designated staff, including faculty, to ensure high touch surfaces are disinfected and end-of-day cleaning/disinfection is done routinely and as necessary.
 - Staff is trained on proper disinfection procedures.
 - Employees are informed of the frequency and scope of cleaning and disinfection performed on campus.

Should we have a COVID-19 case in our workplace, we will implement the procedures delineated in the COVID-19 Preparedness and Response Plan

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. Cleaning supplies, including disinfectant wipes and/or spray and micro-fiber cloths, are provided to all classrooms, offices, kitchen, and other congregate areas on campus.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluated handwashing facilities throughout campus before school reopening and added the following:
- Installed new touch-free washed stations outside restrooms
- Purchased and distributed portable touch-free hand sanitizer stands throughout campus at easy access locations.
- Installed wall-mounted hand sanitizer dispensers with methanol-free hand sanitizer in all classrooms, offices, and other areas on campus.
- Posted visual aids next to sinks and wash stations as a reminder to wash hands and how to perform handwashing properly (for at least 20 seconds).

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 **Appendix C: Investigating COVID-19 Cases** form and/or the **OCHCA COVID-19 Exposure Investigation Worksheet**.

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

- Required to quarantine if identified to be a close contact to the index case.
- Encouraged to be tested for COVID-19 testing at no cost during their working hours.
- Provided the information on benefits 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 it includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to COVID-19, the COVID Coordinator/RN.
- Employees can report symptoms and hazards without fear of reprisal to the COVID Coordinator or a member of the Safety Committee member and/or Administration.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- When and where routine COVID-19 testing will occur.
- At times when testing is not required, employees can access COVID-19 testing if they choose to be tested due to exposure or symptoms through their primary care providers (PCP), urgent care, testing supersites, or various pharmacies, ie. CVS, Walgreen, etc.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 protocols detailed in our COVID-19 Preparedness and Response Plan.

Training and Instruction

We will provide periodic training and instruction that includes:

- Our COVID-19 protocols, and policies & 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.
- 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.
- 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 handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing 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.
- Training will be provided through **SafeSchools**.

Appendix D: COVID-19 Training Roster will be used to document this training when an e-roster or other form of attendance tracker is not available.

Exclusion of COVID-19 Cases from work

When 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 (10) ten 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've demonstrated that the COVID-19 exposure is work-related. This will be accomplished by providing employee sick leave benefits consistent with The CARES Act.
- The COVID-19 coordinator will provide HR with pertinent information from the COVID case investigation to determine work-related exposures and possible transmission.
- 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 workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
- Use **Appendix C: Investigating COVID-19 Cases** form or COVID-19 Cases school tracker to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or 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 100.4, or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least (10) ten 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 has 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.
- 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) ten days from the time the order to isolate or quarantine was effective.

Sonia Rangel

2/18/2021

Sonia Rangel, Chief Operating Officer

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, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposures will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person(s) conducting the evaluation: _____

Date: _____

Name(s) of employee and authorized employee representative that participated:

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

Appendix B: COVID-19 Inspections

Date: _____

Name of person conducting the inspection: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Other _____			
Other _____			
Administrative			
Physical distancing			
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			
Other _____			
Other _____			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
Other _____			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, 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.

Person(s) Conducting the Investigation: _____

Name(s) of staff involved in the investigation:

_____	_____	_____
_____	_____	_____
_____	_____	_____

Date: _____

Employee Name: _____

Occupation: _____

Was COVID-19 test offered? Yes No

Date the case first had one or more COVID-19 symptoms: _____

Date and time the COVID-19 was last present in the workplace: _____

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

Information received regarding COVID-19 test results and onset of symptoms. Yes No

If yes, attach documentation.

Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period and who may have been exposed (attach additional information):

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

All employees who may have had COVID-19 exposure and their authorized representatives.	Date:	
	Names of employees that were notified:	

Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:	
	Names of employees that were notified:	

What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?

What could be done to reduce exposure to COVID-19?

Was local health department notified? Yes No Date: _____

Additional Consideration #1

Multiple COVID-19 Infections deemed to be a COVID-19 Outbreak

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

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be tested as soon as we become aware of the outbreak and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by or orders issued by the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA or the local public health.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review, and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and

review. We will consider:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection as appropriate.

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illnesses

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

COVID-19 hazard correction

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

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

Notifications to the local health department

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