

# COVID-19 Prevention Program (CPP) for Westerly School of Long Beach

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

**Date:** February 1, 2021

## Authority and Responsibility

**Dr. Lauren Plant, Head of School**, 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 to ensure compliance with our COVID-19 policies and procedures.
- Evaluate classroom space using the State of California, Los Angeles County, and City of Long Beach Return to School guidance.

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: evaluating their workspaces on a regular basis and monitor students to ensure that they are following COVID-19 protocols. Employees are encouraged to report any concerns to the Head of School or Business Manager.

## Employee screening

We screen our employees by:

- Employees are required to self-screen by completing a daily health report that can be accessed via mobile application or paper.
- Employees have temperatures taken upon arrival to work. Screeners are wearing a face mask and face shield while using a non-contact thermometer to obtain temperature. Employee is wearing a face mask during this process.

## 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:

Inspections will be done on a weekly basis for the workspace environment. Ongoing monitoring of physical distancing and student behavior is in place. Changes needed to campus protocols are reviewed immediately and implemented in a timely manner.

## **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:

- Individual office spaces have been assigned for administrative staff where feasible. Employees that work in a common area are required to wear face masks when others are present. Floor markings are utilized to create a “work zone” for those in a common area to maintain physical distancing.
- Visitors to the campus are limited. Visitors who must come on campus to perform their job are required to complete a health screening certification and temperature screening.
- Floor markings are used for directional flow of traffic in commonly accessed areas. On campus, directional markings are used so foot traffic flows in one direction.
- Employees have staggered arrival times when possible. Students have staggered arrival and departure times.

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 provide clean, undamaged face coverings and ensure they are properly worn by employees 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. Disposable face masks, N95 masks, and face shields are available for employees at all times. All employees who encounter non-employees without a face mask should request the non-employee to wear their mask. If the non-employee doesn't comply, they should direct the non-employee to the Administrative staff.

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 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 implement the following measures for situations where we cannot maintain at least six feet between individuals: Plexi-shields and tables provide a physical barrier from front desk to lobby area.

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

- Classroom spaces will have doors and windows open for ventilation. Where installed, NanaWalls will be open each day for full ventilation.
- HEPA filters will be used in classrooms that do not have air conditioning/heating units that provide

air filtration.

- Classes, whenever possible, will be conducted outdoors.
- On days that have hazardous conditions, such as heat and wildfire smoke, doors and windows may be closed but air conditioning and HEPA filtration units must be used.
- Maintenance of air filters will be conducted on a regular basis.
- HEPA filters and air conditioner filtration meet MERV-13 standards.

### **Cleaning and disinfecting**

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

- Employees are provided cleaning materials to use in classrooms and workspaces. Class schedules have defined cleaning periods throughout the day.
- Common spaces are disinfected by employees on regular intervals.
- Cleaning and disinfecting schedules are posted.

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

- Affected area is quarantined for as long as possible before cleaning and disinfecting.
- Employees, wearing medical gloves and masks, will clean the affected area. Disinfectant materials will be used to clean surfaces. In-house disinfectant fogger will be used in the area.
- Designated employees on campus are trained to use the disinfectant fogger and sanitize the space.

### **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 employees who have been provided disinfecting materials to be used as needed. Cleaning of all areas is performed nightly by the cleaning crew, who use their disinfectant products. Pens that are used by visitors or at the employee sign-in desk are disinfected throughout the day with EPA approved cleaning products for COVID..

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we have:

- Handwashing facilities have been evaluated to ensure that physical distance can be maintained for multi-faucet sinks.
- Additional handwashing facilities have been added to the campus to increase the capacity for students and employees.
- Employees are encouraged and allowed time for handwashing throughout the day.
- Signage has been added to all handwashing facilities encouraging employees to wash their hands for at least 20 seconds each time.
- Hand sanitizer is provided for each classroom space, office space, and areas where shared equipment is located. Hand sanitizer is available near all "high touch" areas with signage reminders to use hand sanitizer after touching shared equipment.
- Hand sanitizer contains 70% alcohol-based and compliant with CDC recommendations. Hand sanitizer does not contain methanol.

### **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.

We provide and ensure 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:

- Employees will be referred to COVID-19 testing sites in Long Beach.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

## **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 the Head of School or Business Manager by email or verbally.
- Employees can report symptoms and hazards without fear of reprisal.
- The Head of School will review all accommodation requests for employees with medical or other conditions that put them at increased risk of severe COVID-19 illness. Wherever possible, accommodations will be made.
- Where testing is not required, employees are provided information that will direct them to local testing sites.
- 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 policies and procedures.
- Weekly newsletter communicates to employees any possible COVID-19 exposures on-campus through a COVID-19 dashboard in which no individuals are identified.

## **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 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 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.
- Training sessions have been held before the start of school and refresher materials given after school breaks.

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

## Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by employer-provided employee sick leave benefits and workers' compensation. We will follow California law pertaining to sick leave, workers' compensation and disability.
- 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 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

- 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 days have passed since COVID-19 symptoms first appeared.
  - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
  - A negative COVID-19 test will not be required for an employee to return to work.
  - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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Approved by:

A handwritten signature in black ink, appearing to be 'LP', written in a cursive style.

Dr. Lauren Plant  
Head of School

2-1-21

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 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 fixed work locations.

**Person conducting the evaluation: Dr. Lauren Plant**

**Date: Spring 2020 / Summer 2020 / Fall 2020/ Winter 2021**

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

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
Front lobby and reception desk	morning entrance afternoon exit	People entering from the outside, moving in opposing directions, and close proximity for interaction with employees at the front desk.	Hand sanitizer station at the front entrance along with signage regarding sanitization, physical distancing, and masking protocols. Plexi-shields for front desk workers to lobby area, tables placed in front of counter to provide a physical barrier, staggered start and end time for students, employees stagger start and end times
Administrative building - access to mail, copy machines, and commonly shared items	ongoing	High touch areas used by multiple employees.	Directional floor markings for flow of traffic, sanitization reminders at common use areas, masks required at all times. Frequent sanitization after usage.
Restrooms	ongoing	High touch areas used by multiple employees.	Cleaned and sanitized on regular schedule
Breakroom - kitchen area	breaks and lunch	Gathering location for employees engaged in high-risk activity - eating.	No access to a shared breakroom. Employees are encouraged to use their workspaces.
Classrooms	ongoing	Multiple people in one singular space, with frequent verbal interaction.	Frequent sanitization, masking required at all times, physical distancing employed at all times.

Conference rooms	Weekly meetings	Multiple people in one singular space.	No access to conference rooms. Meetings are held virtually whenever possible.



## Appendix B: COVID-19 Inspections

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>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Student desks are physically distanced within classrooms			
<b>Administrative</b>			
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			
Disinfecting hand sanitizer station ready for use in lobby and hand sanitizer in classrooms			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

## 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.

Date: **[enter date]**

Name of person conducting the investigation: **[enter name(s)]**

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

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

<b>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

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

## Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

