

School District  
COVID-19 Prevention Program (CPP)

**WILLITS  
UNIFIED  
SCHOOL DISTRICT**

**COVID-19  
PREVENTION PLAN**

AS MANDATED BY:  
CCR Title 8 Sections 3205, 3205.1, 3205.2, 3205.3, 3205.4

SUPERINTENDENT:  
Mark Westerburg

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## School District COVID-19 Prevention Program (CPP)

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

### Authority and Responsibility

The Superintendent has the overall authority and responsibility for implementing the provisions of this CPP at the School District. In addition, all Principals, directors, and supervisors are responsible for implementing and maintaining the CPP at the school sites and for ensuring employees receive answers to questions about the Covid-19 Prevention Program.

The Superintendent is the CPP Officer for the specific implementation of the elements of this plan.

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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

The School District will implement the following identification and evaluation strategies:

- Evaluate employees' potential workplace exposures to all persons at, or who may enter, a school district facility
- 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 and the need for different or additional controls.

#### Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by contacting their supervisor or Principal at the school site. In addition, School District Administration may also be contacted at the District Office.

#### Employee screening

- Each day each employee is encouraged to review a wellness check document that was sent to each employee. This wellness check will be used as a guide to determine if the employee continues to work or will be sent home.
- Employees will be encouraged to check their own temperature each and every day prior to coming to work. **Any temperature of 100.4 degrees Fahrenheit or higher is defined as a fever**

### Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions; practices or procedures will be corrected in a timely manner based on the severity of the hazards, as follows:

- The severity of the hazard will be assessed. Appropriate work orders, procedures, or other mitigation strategies will be implemented within 3 working days.
- The CPP Officer, designated by the Superintendent is responsible for timely correction.
- Follow-up measures will be taken to determine if the mitigation strategies have been effective.

### Control of COVID-19 Hazards

#### Physical Distancing

Where possible, the School District will ensure at least six feet of physical distancing at all times:

- When possible, all the School District employees, sub-contractors, vendors or anybody else making contact at any School District site are required to be checked in daily with the School District representative (manager or designee).
- **The School District requires a minimum of 6' of physical distancing at all times by all employees, when possible.**

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- When possible, provide single point of entrance to the site. Always maintain 6 ft minimum physical distancing, when possible.
- Encourage staff to complete health self assessment.
- Any individual that appears to be unwell will NOT be granted access to the site or allowed to start work.
- Require sick workers/employees – and those displaying flu-like symptoms – to stay home. (“Worker/Employee” means worker or employee for the School District, subcontractors, designers, consultants, etc.)
- Send employees off site immediately who show signs and symptoms of flu-like or acute respiratory illness symptoms
- Hand Sanitizer and appropriate protective gloves shall be made available throughout each site and office, as necessary.
- Encourage respiratory etiquette, including covering mouth and or nose when coughing and/or sneezing. Cover the mouth and nose with a tissue. If a tissue is not immediately available cough or sneeze into your sleeve, not your hands.
- Signage will be posted throughout District buildings and work areas to raise awareness.
- Minimize the number of employees working within a certain area of a (6’ of physical distance to be maintained at all times, when possible).
- Encourage employees not to share tools or work areas; if this does take place ensure the tools/areas are disinfected after use.
- Ensure routine cleaning of frequently touched surfaces including the following: door handles, elevator buttons, all surfaces, equipment, and tool handles.
- Use of shift-work, when possible, to minimize the number of employees working within certain areas.
- Stagger break and lunch time, when possible, to avoid employees from gathering in one location.
- As possible, only perform critical/essential activities.
- No gatherings of employee of more than 10 people, including: breaks, lunch, and meetings. If more than ten employees are involved in a meeting, procedures must be followed to minimize contact.
  - Seats placed at least 6’ apart in all directions.
  - Hand wipes be provided
  - Each employee may be assigned a place to sit.
  - Hand washing will be encouraged and sanitizer will be provided.
  - Gloves will be available.
  - Masks or faces shields be provided and will be required while inside the building.
- Rotating work schedules will be considered when appropriate. Appropriate schedules could include:
  - Staggered start and ending times
  - AM/PM schedule
  - Alternating days
- All meetings are encouraged to be call-in/video conference; this includes both office and field meetings. Any meeting or training session attended by employees must provide for physical distancing of 6’.
- Minimize number of employees at a work location based on the size of the work location.
- Encourage employees not to carpool unless they are members of the same household.
- No physical greetings such as a handshake or hug.

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

### **Face Coverings**

Each site will 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. Employees may provide their own face coverings or

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Use the disposable face coverings provided at the point of entry to the site.

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

- When an employee is alone in an office or workplace.
- 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

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**

To the extent feasible, the school district will maximize the quantity of outside air for buildings with mechanical or natural ventilation systems by:

- If the amount of outside air needs to minimize due to other hazards, such as heat and wildfire smoke, outside air vents and windows will be closed.
- For buildings with mechanical or natural ventilation, or both, the District will 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 letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
- The HVAC system will be properly maintained and adjusted by the District Maintenance staff and HVAC Technician(s).
- Employees are encouraged to open windows or doors with outside conditions are favorable.

### **Cleaning and disinfecting**

The following cleaning and disinfection measures for frequently touched surfaces will be implemented:

- The Site Principal or Supervisor will ensure that adequate supplies and adequate time for disinfection/cleaning to be done properly.
- The Site Principal or Supervisor will direct the custodians in the frequency and scope of cleaning and disinfection.

When a COVID-19 case is identified at a school site or workplace, the following procedures will be implemented:

Employees performing disinfection tasks are advised to wear PPE.

- Disposable gloves- Ex: Latex or Nitrile
- Mask- Ex: Disposable face mask
- Eye covering- Ex: Safety glasses, Safety goggles, Face shield

Procedures

- Clean the surface first, and then disinfect.
- Body fluids must be thoroughly cleaned from surfaces/objects. Use soap and water to clean first.
- Apply the district approved disinfection product. The employees should review the SDS for the chemical to be used and follow all label directions.

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- The surface must stay wet for the appropriate dwell time listed on the product.
- Dispose into the trash any paper towels, gloves, and other materials that came in contact with the surfaces during the cleaning and disinfection process.

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 the affected employee with the District approved disinfecting product.
- 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

- To protect employees from COVID-19 hazards, the District will evaluate its hand washing facilities, determine the need for additional facilities, encourage and allow time for employee hand washing, and provide employees with an effective hand sanitizer. Employers shall encourage employees to wash their hands for at least 20 seconds each time.
- Wash hands frequently with soap and water for a minimum of 20 seconds. If soap and water are not available, use hand sanitizer (70% alcohol content or greater). At a minimum, employees should wash hands at the beginning and end of each shift, after using the toilet, before and after each break.
- Encourage respiratory etiquette, including covering mouth and or nose when coughing and/or sneezing. Cover the mouth and nose with a tissue. If a tissue is not immediately available cough or sneeze into your sleeve, not your hands.
- Avoid touching your eyes, nose, and mouth especially with unwashed hands.

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

PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, will be provided, as needed.

The School District will evaluate the tasks or conditions in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained for the need to utilize N95 or other tight-fitting respirators.

The School District will provide and ensure use of eye protection and respiratory protection in accordance with CCR Title 8 section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

**Response to a COVID-19 case in the workplace:**

The District will take all of the following steps in response to a COVID-19 case in the workplace.

1. Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
2. Determine who may have had a COVID-19 exposure. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace, which may have been visited by the COVID-19 case during the high-risk exposure period.
3. Give notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
  - a. All employees who may have had COVID-19 exposure and their authorized representatives.
  - b. Independent contractors and other employers present at the workplace during the high-risk exposure period.

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4. Offer COVID-19 testing at no cost to employees during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with the information on the COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This may include any benefits available under workers' compensation law, the federal Families First Corona virus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the employer's own leave policies, and leave guaranteed by contract.
5. Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.
6. All personally identifying information regarding COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by the employer under this section and sections 3205.1 through 3205.4 shall be provided in a manner that ensures the confidentiality of employees.

### **System for Communicating**

The School District goal is to ensure that effective two-way communication with employees is performed and includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to their Supervisor.
- Employees can report symptoms and hazards without fear of reprisal.
- School District procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- To give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work, employees may access COVID-19 voluntary testing available through health plans or local testing centers.
- In the event testing is required to be provided because of a workplace exposure or outbreak, the School District 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 the workplace) may be exposed to, what is being done to control those hazards, and the School District's COVID-19 policies and procedures.

### **Training and Instruction**

The School District will provide effective training and instruction that includes:

- 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

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Face covering.

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- 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 documented by completing a training log in HR.

**Exclusion of COVID-19 Cases**

When a COVID-19 case is identified in the workplace, the School District will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until 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.
- Providing employees at the time of exclusion with information on available benefits.

**Reporting, Recordkeeping, and Access**

The School District's CPP Officer or designee will:

- Report information about COVID-19 cases 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 the place of employment or in connection with any employment.
- Maintain records of the steps taken to implement the written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make the written COVID-19 Prevention Program (CPP) available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- 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 shall not return to work until:**

1. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
2. COVID-19 symptoms have improved; and
3. At least 14 days have passed since COVID-19 symptoms first appeared.

**COVID-19 cases who tested positive but never developed COVID-19 symptoms**

Shall 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 shall 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 shall 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 shall be:

- 10 days from the time the order to isolate was effective, or (subject to change by MCHD)
- 14 days from the time the order to quarantine was effective.

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**Multiple COVID-19 Infections and COVID-19 Outbreaks**

If a local health department as the location of a COVID-19 outbreak identifies a school site or school district workplace, this section of CPP will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period. The school site or school district will comply with isolation, quarantine, and testing processes as deemed necessary by county public health or by Cal/OSHA. Additionally:

**Exclusion of COVID-19 cases**

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

**Investigation of workplace COVID-19 illnesses**

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

**COVID-19 investigation, review and hazard correction**

In addition to the CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, the School District 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:
  - Leave policies and practices and whether employees are discouraged from remaining home when sick.
  - COVID-19 testing policies.
  - Insufficient outdoor air.
  - 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. The following will be considered:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.
  - Increasing physical distancing as much as possible.
  - Respiratory protection.

**Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in the workplace, the CCP Officer will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- The CPP Officer 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 any other information requested by the local health department. The CPP Officer will continue to give notice to the local health department of any subsequent COVID-19 cases at the workplace.

OSHA – [Temporary Emergency Cal-OSHA Requirements](#)  
[Cal-OSHA website](#)  
[FAQ's from Cal-OSHA](#)