

# **COVID-19 Prevention Program (CPP)**

## **Wildflower Open Classroom**

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

### **Authority and Responsibility**

The Wildflower Open Classroom (WOC) school director or designee 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.

### **Employee participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by bringing such potential hazards to the attention of the WOC Director or designee.

### **Employee screening**

We screen our employees by having each employee self-screen according to CDPH guidelines each day prior to arriving on the WOC campus. If additional screenings are required on campus, WOC will ensure that face coverings are used during screening by both screeners and employees and, if temperatures are measured, that non-contact thermometers are used.

### **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 by the appropriate WOC staff member as identified by the WOC Director or designee. The severity of the hazard will be assessed and correction time frames assigned, accordingly. Follow-up measures are taken to ensure timely correction.

## **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:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements if the employees' position and duties allow.
- 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 or their direction and path of travel.
- Staggered arrival, departure, work, and break times, if applicable.
- Adjusted work processes or procedures to allow greater distance between employees. • Reference section 3205(c)(6) for details]

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

### **Face Coverings**

WOC 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. Face coverings will be made available in WOC office and all classrooms throughout campus. If an employee encounters an individual on campus without the proper face covering, the employee will report the individual to the WOC office so that the issue can be corrected.

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.
- 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**

WOC will implement the following measures for situations where we cannot maintain at least six feet between individuals:

- Install solid, plexiglass partitions or provide moveable plexiglass dividers where applicable. • Ensure that all activities that do not permit a six-foot distance take place outside campus buildings.

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

- Ensuring that each classroom, office or common space has windows that open or is adjacent to a room with operating windows to provide fresh air. All employees will be encouraged to keep windows open whenever feasible.
- Maintain campus ventilation systems to ensure maximum airflow and filtration.

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- Provide and maintain each classroom and common workspace with an air filtration/purification unit.

### **Cleaning and disinfecting**

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

- Clean and disinfect all frequently touched surfaces according to the custodial schedule.
- Utilize COVID-19 recommended cleaning and disinfecting solutions and chemicals.
- Ensuring adequate supplies and adequate time for cleaning to be completed properly.
- Inform all employees and of the frequency and scope of cleaning and disinfection.

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

- Isolate the areas, including classrooms, used by a COVID-19 case for the high-risk exposure period.
- School custodian will deep clean and disinfect all areas used by the COVID-19 case.

### **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, including teachers, as appropriate during the school day.
- School custodian during regular cleaning schedule and as needed in highly used areas.
- All employees will be provided with the cleaning materials and training to clean and disinfect workplace and classroom equipment and materials.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, WOC staff will:

- Evaluate handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allow time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.
- Post directions for proper and effective handwashing techniques in appropriate areas throughout campus.
- Install and maintain hand sanitizer stations throughout campus.

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

WOC will 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, WOC will 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**

WOC will investigate and respond to COVID-19 cases by using the **Appendix C: Investigating COVID 19 Cases** form.

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

- By offered COVID-19 testing at no cost during their working hours.
- Provide employee with information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases.

## **System for Communicating**

WOC's 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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how to report. COVID symptoms can be reported to school director or designee or school nurse. COVID hazards can be reported to school director or designee or school custodian.
- Employees can report symptoms and hazards without fear of reprisal.
- Procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing.
- In the event WOC is required to provide testing because of a workplace exposure or outbreak, school 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. Testing will be offered at no cost to the employee and may take place during working hours, including when the testing is in response to CCR Title 8 section 3205.1, Multiple COVID-19 Infections and COVID-19 Outbreaks, as well as section 3205.2, Major COVID-19 Outbreaks.
- 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.

## **Training and Instruction**

WOC 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.
- The fact that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
- The fact that 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 facecoverings.
- 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.

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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.

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

## Exclusion of COVID-19 Cases

Where WOC has 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.
- Continue to maintain an employee's earnings, seniority, and all other employee rights and benefits whenever it is demonstrated that the COVID-19 exposure is work related. This includes employer-provided employee sick leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

The WOC policy for reporting, recordkeeping and access is as follows:

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

This section of the CPP will be utilized if WOC is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]

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**

WOC 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 immediately tested 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, WOC 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.

#### **Exclusion of COVID-19 cases**

WOC 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**

WOC 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**, WOC 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.
  - 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.

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- 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.

#### 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.
- WOC 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. WOC will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

#### Major COVID-19 Outbreaks

**This section of the CPP will be utilized should WOC experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]**

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

WOC 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

WOC 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

WOC 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**, WOC will take the following actions:

- In buildings or structures with mechanical ventilation, WOC 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.
- WOC will determine the need for a respiratory protection program or changes to an existing WOC COVID-19 Prevention Program (CPP) 7 respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- WOC 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.

### **Notifications to the Local Health Department**

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

Approved by Wildflower Open Classroom Board of Directors: January 25, 2021  
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Reviewed by Wildflower Open Classroom Board of Directors: May 24, 2021  
Reviewed by Wildflower Open Classroom Board of Directors: August 9, 2021  
Reviewed by Wildflower Open Classroom Board of Directors: January 10, 2022



## **Appendix A: Identification of COVID-19 Hazards – Wildflower Open Classroom**

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: classrooms, meeting areas, entrances, bathrooms, hallways, walkways, break or eating 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 and independent contractors. WOC 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: Date:**

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

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**Appendix B: COVID-19 Inspections – Wildflower Open Classroom**

Name of person conducting the inspection: Date:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Building			
Barriers/partitions			
Ventilation Windows (amount of fresh air and filtration maximized).			

Ventilation HVAC Systems (amount of fresh air and filtration maximized).			
Air Purifiers			
Hand Washing Stations			
Hand Sanitizing Stations			
COVID Related Signage			
<b>Administrative</b>			
Physical Distancing – Common Areas			
Physical Distancing - Classrooms			
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			
<b>PPE</b> (not shared, available and being worn)			
Face coverings (sufficient Supply)			
Gloves			
Face shields/goggles			
Respiratory protection			

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### Appendix C: Investigating COVID-19 Cases – Wildflower Open Classroom

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.

**Name of person conducting the investigation: Date:**

<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>	
<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:**

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 individuals 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?		Date:	

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

[illegible]
