

COVID-19 Prevention Program (CPP) for

Trinity High School



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

Authority and Responsibility

Trinity Alps Unified School District 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 working 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 by following our screening protocols.
- Review and update applicable orders and general 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 as guidance or circumstances change.
- 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

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment. Employees are also responsible for whole-hearted, genuine compliance with all aspects of this Program while performing their duties to minimize the spread of the virus at our workplace we are asking our workers to help with our prevention efforts while at work.

In addition to those set forth in this Program, employees must adhere to the following expectations:

- Stay at home when sick and avoid close contact with others
- Do not come to work if any member of your household is sick.
- Refrain from shaking hands, hugging, or touching others.

- Wear appropriate face coverings in the workplace, unless an exception to this requirement applies.
- Clean surfaces before and after use in common areas, and when using shared equipment.
- Avoid touching mouth, nose, and eyes.
- Wash hands with soap and water for at least 20 seconds. Use hand sanitizer with at least 60% alcohol if soap and water are not available.
- Wash/sanitize hands multiple times daily, including before and after work; during breaks; before and after eating; after coughing, sneezing, or blowing nose; and before and after going to the restroom.
- Cover mouth and nose with a tissue when coughing or sneezing and immediately discard it after use and wash hands. If no tissues are available, cover mouth with shoulder or elbow and then wash hands.
- Avoid sharing personal items with coworkers (e.g., food, dishes, lunch boxes, gloves, etc.).
- Keep a minimum distance of 6 feet from others when possible.
- Follow all CDC, State, and local health department guidelines on use, removal, cleaning, and disinfection of face coverings.

Employee screening

We screen our employees by:

- Employees will be asked to symptom check using CDC guidelines prior to coming into work. Employees who are sick or exhibiting symptoms of COVID-19 should not come into the workplace.
- Any employee entering the workplace shall follow directions at each zone entrance.
- Frequent hand washing is encouraged.
- The use of hand sanitizer and disinfection shall be available upon entering the building and near all commonly touched surfaces (e.g. communal printers, copiers, microwave, refrigerator, etc.).
- Masks using CDC guidelines are required in communal areas (e.g. hallways, meeting rooms, and other communal areas). Visitors from the public will be required to wear masks. If you share an office space, masks are required at all times when multiple employees are in the same office.
- Gloves will be available at the entrance of the buildings for use when cleaning.

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.

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:

- Reducing the number of persons in all area at one time, including visitors.
- See also the Trinity County Schools Reopening Plan pages 5, 8 and 11 found at www.tausd.org.

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 employees properly wear them 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. We have disposable masks available if needed for all employees and visitors entering the workplace.

Masks using CDC guidelines are required in communal areas (e.g. hallways, meeting rooms, and other communal areas). Visitors from the public will be required to wear masks. If you share an office space, masks are required at all times when multiple employees are in the same office. Some staff may be required to wear masks at all times due to the office being open to the public and inability to physically distance.

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

- When an employee is alone in a room or in their office.
- 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, for any reason, shall be at least six feet apart from all other persons.

Engineering controls

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

Maintenance will monitor, in accordance with Cal/OSHA requirements, HVAC systems to ensure appropriate air movement and filtration on a regular basis. For indoor locations, Maintenance will evaluate how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.

Cleaning and disinfecting

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

- Regular housekeeping practices, which includes cleaning and disinfecting common surfaces, workplace common areas, frequently used tools and equipment, and other frequently touched surfaces and objects (e.g. doorknobs, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels) in the workplace in accordance with current CDC guidelines. Employees should regularly do the same in their assigned work areas.

- Established procedures to routinely clean and disinfect commonly touched surfaces and objects (e.g., door handles, flat surfaces, handrails, restrooms, etc.) throughout the workday, including:
 - Using disinfectants that are EPA approved for use against the virus that causes COVID-19.
 - Providing EPA-registered disposable wipes for employees to wipe down commonly used surfaces before and after use.
 - Following the manufacturer’s instructions for all cleaning and disinfection products (e.g., safety requirements, protective equipment, proper dilution, contact time).
 - Following safe work practices such as never mixing products together and using adequate ventilation.
 - Cleaning visibly dirty surfaces first before disinfection. Disinfectants are less effective if used on soiled surfaces.
 - Ensuring there are adequate supplies to support cleaning and disinfection practices, including cleaning products and tools and chemical resistant gloves. Make sure disinfectants are available to workers throughout the worksite.
 - Shared equipment shall be cleaned and sanitized before and after use by each individual employee using the equipment.
 - Shared spaces shall be equipped with hand sanitizer and disinfection products.
 - Employees are encouraged to routinely clean frequently touched surfaces in their workspace, such as keyboards, mice, telephones, desks

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

After being informed that an employee has tested positive for COVID-19, custodial shall immediately clean and disinfect all areas at the worksite accessed by the sick employee and all materials, tools, equipment, and commonly touched surfaces used by the sick employee during the high-risk exposure period.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, such as 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 utilizing the disinfection protocols.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit the purchase of hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time with signage as reminders.
- Purchase single-use towels and additional soap.
- Place additional handwashing supplies as close to work areas and break areas as possible to allow for frequent handwashing.

- The use of hand sanitizer and disinfection stations shall be available upon entering the building and near all commonly touched surfaces (e.g. communal printers, copiers, microwave, refrigerator, etc.).
- The provided hand sanitizer will meet the recommendations from CDC and Public Health.
- Gloves will be available at the front entrance of the buildings for use when cleaning.
- See also the Trinity County Schools Reopening Plan page 6 found at www.tausd.org.

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.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the information provided in **Appendix C: Investigating COVID-19 Cases** form.

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

- Offered COVID-19 testing at no cost during their working hours.
- See also the Protocol Guidance for notification of staff found at www.tcoek12.org/images/COVID/Suggested_Covid_Exposure_Response_Protocols_8.pdf.

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, that includes the following information:

- Employees are to report COVID-19 symptoms and possible hazards to their supervisor.
- Employees can report symptoms and hazards without fear of reprisal.
- Employees can access COVID-19 testing weekly for free from our county-provided testing program and can access the testing during work hours when previously approved by their supervisor.
- Self-tests will be available from Trinity County Office of Education.

Training and Instruction

Prior to our office reopening we provided training and instruction which was required for all employees to participate in, and who had to document their participation through Keenan training programs. The trainings were on:

- Coronavirus Awareness
- Coronavirus: Cleaning and Disinfecting Your Workplace and Coronavirus

We also provided training on:

- Cleaning and Disinfecting
- Signs and symptoms of COVID-19
- Mitigation strategies for preventing COVID-19

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 (the specifics of which are determined by our local public health department). See the Trinity County Schools Reopening Plan page 10 found at www.tausd.org, and the recent Trinity County Public Health Press Release on December 18, 2020 that can be found at www.trinitycounty.org.

- Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known COVID-19 exposure to a COVID-19 case or whatever is the latest in recommendations by our Public Health Department.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we have demonstrated that the COVID-19 exposure is work-related. This will be accomplished by 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 and leaves.

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 or the type of information contained in the 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, as per our Trinity County Schools Reopening Plan page 10 found at www.tausd.org, 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 10 days from the time the order to quarantine was effective.
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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, kitchen, 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, 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:

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

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

Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to our particular type of workplace.

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			
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			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			

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:

Name of person conducting the investigation:

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

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace 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

- 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 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, 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.

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.
 - [describe other applicable controls].

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 will need to be added to your CPP should your workplace 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

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 our buildings 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.

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**.