

**COVID-19 PREVENTION PROGRAM  
(CPP)**

**MERIDIAN ELEMENTARY SCHOOL**

**Tracey McPeters, Superintendent**

**August 2022**

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## Introduction

The COVID-19 Prevention Program (CPP) addendum to the Injury and Illness Prevention Program (IIPP) has been developed and implemented pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)) updated August 2, 2022. This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in the workplace.

## Authority and Responsibility

The Superintendent/Principal has overall authority and responsibility for implementing and maintaining the provisions of this CPP at Meridian Elementary School and for ensuring employees receive answers to questions about the program in a language they understand.

## System for Communicating

It is the district's goal to have effective two-way communication with employees, in a form they can readily understand. All employees of the district are to, without fear of reprisal, report to the Superintendent or designee any of the following:

Personal Symptoms or Exposure:

- To Whom: Employees are to report personal symptoms, exposures, and positive COVID-19 tests to Tracey McPeters, Contact Tracer.
- How: Employees should report this information immediately by email or phone call.
- When: Immediately

Possible COVID-19 hazards at the workplace:

- To Whom: Hazards should be reported to the Superintendent or designee.
- How: Hazards can be reported in person, by email, or phone call.
- When: Immediately

Employees who are at a higher risk for complications as a result of COVID-19, can request a meeting with the Superintendent.

Employees wishing to access COVID-19 testing, where testing is not required, will be provided a self-test onsite. In the event the district is required to provide testing because of a workplace exposure or outbreak, the 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.

The district will follow the procedures in Section, *Identification and Evaluation of COVID-19 Hazards*, to identify and evaluate COVID-19 hazards. Employees will be notified of potential hazards, what is being done to control those hazards, and the district's COVID-19 policies and procedures through training and this CPP.

## Identification and Evaluation of COVID-19 Hazards

The following procedures will be put in place to identify and evaluate COVID-19 hazards:

- Conduct workplace-specific evaluations using the *Appendix A: Identification of COVID-19 Hazards* form.
- In accordance with the August 12, 2021 state health order, all staff must be vaccinated or they will need weekly COVID-19 testing. Document the vaccination status of our employees using Appendix E: *Documentation of Employee COVID-19 Vaccination Status, which is maintained as a confidential medical record.*
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, this 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 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 COVID-19 policies and procedures.

The district will monitor and review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention. Tracey McPeters, Superintendent, receives updates on COVID cases, trends, updates to guidance, and other COVID-19 health impacts to schools.

### **Employee Participation**

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying the Superintendent of any concerns of potential hazards so they can be addressed.

### **Employee Screening**

Employees will be asked to monitor their health each day and are asked to notify their supervisor before their scheduled shift and prior to arriving at the site, if they have been exposed to someone with COVID-19 or have a temperature of 100.4 or more, tiredness, chills, shortness of breath, difficulty breathing, nausea, vomiting, diarrhea, sore throat, loss of taste or smell, cough, or muscle pain.

While at work, if an employee is not feeling well and is exhibiting symptoms that may be attributed to COVID-19, the district will immediately ask the employee to COVID test, or send the employee home or to medical care. If an employee goes home because they are sick, the district will clean and disinfect the area/room/office where the person worked and the tools and equipment they used prior to use by others.

The district actively encourages sick employees to stay home and to COVID test.

### **Investigating and Responding to COVID-19 Cases**

Procedure to investigate COVID-19 cases in the workplace:

- *Appendix C: Investigating COVID-19 Cases form* will be used to verify COVID-19 case status, receive information regarding COVID-19 test results and onset of COVID-19 symptoms, and identify and record COVID-19 cases. The contact tracer will:
  - 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), diagnosis, and/or the date the onset of COVID-19 symptoms, if any were experienced.
  - Evaluate the activities of the COVID-19 case and all locations at the workplace which may have been visited during the high-risk exposure period, to determine potential exposures.

Response to a COVID-19 case in the workplace:

- Tracey McPeters, Superintendent, conducts interviews and completes required reporting.
- The district gives 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:
  - All employees who may have had COVID-19 exposure and their authorized representatives.
  - Independent contractors and other employers present at the workplace during the high-risk exposure period.
- The district offers COVID-19 testing at no cost to employees during their working hours to:
  - Symptomatic employees, regardless of whether there is a known exposure.
  - All employees, regardless of vaccination status, who have had close contact with a COVID-19 case, except for recently recovered employees.

- All employees except recently recovered employees, regardless of vaccination status, in an outbreak (Weekly) or a major outbreak (twice a week).
- When following CDPH's Isolation and Quarantine Guidance to keep employees working or return them sooner, if tested.
- The district will provide employees with information of benefits.
- After each incident, the leadership team, investigates 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.

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 shall be provided in a manner that ensures the confidentiality of employees.

### **Correction of COVID-19 Hazards**

The district believes in a safe and healthy work environment for all employees. Any unsafe or unhealthy work conditions, practices or procedures will be documented on the *Appendix B: COVID-19 Inspections* form and will be corrected in a timely manner based on the severity of the hazards. The Superintendent or designee is responsible for scheduling timely correction and follow-up.

### **Training and Instruction**

The district training may consist of reviewing written documentation, online video trainings and/or acknowledge receipt of the District's COVID-19 Prevention Plan (CPP). Training and instruction will include:

- The district's 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.
- The right of employees to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144 requirements:
  - How to properly wear them.
  - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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.
  - The conditions where face coverings must be worn at the workplace.
  - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19, protecting against both transmission and serious illness and death.

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

## **Face Coverings**

The district provides clean, undamaged face coverings and ensures they are properly worn over the nose and mouth where required by orders from the California Department of Public Health (CDPH) or local health department.

Information will be provided to staff on [proper use, removal, and washing of cloth face coverings](#). The site has a supply of disposable masks for anyone who is unable to provide their own.

The district will not prevent any employee from wearing a face covering when not required, unless it would create a safety hazard, such as interfering with the safe operation of equipment. The district will not retaliate against employees for wearing face coverings.

## **Engineering Controls**

The district will evaluate whether it is necessary to implement barriers during an outbreak (3 or more cases in an exposed group of employees). The district will implement barriers during a major outbreak (20 or more cases in an exposed group of employees).

For indoor locations, the district has evaluated 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. Meridian Elementary School services the ventilation systems regularly replacing all filters and servicing any needed repairs.

## **Cleaning and Disinfecting**

Should there be a COVID-19 case in the workplace, areas and equipment used by the sick person will be thoroughly cleaned and sanitized.

## **Hand Sanitizing**

To prevent the spread of respiratory infections from one person to the next, frequent hand washing is recommended. Washing hands with soap and water is one of the most effective ways to prevent the spread of germs. If soap and water are not readily available, use an alcohol-based hand sanitizer (containing at least 60% alcohol). Hand sanitizer with methanol is prohibited.

Alcohol-based hand rub may be used when soap and water is not available. All employees have access to alcohol-based hand sanitizer. Using Alcohol-based Hand Rub (follow manufacturer's directions):

The district has an adequate number of hand washing facilities. Periodic checks are done throughout the day to evaluate cleanliness and supplies.

## **Personal Protective Equipment (PPE) Used to Control Employees' Exposure to COVID-19**

The district will evaluate the need for PPE (such as glove, goggles, and face shields) as required by section 3380, and provide and ensure use of such PPE as needed. If the district identifies COVID-19 as a workplace hazard, it will select and provide exposed employees with properly fitting PPE that will effectively protect employees.

Employees will be provided approved respirators for voluntary use when working indoors or in a vehicle with others upon request to the superintendent. If there is a major outbreak, the district will provide any employee in the exposed group with approved respirators for voluntary use. Once requested, respirators will be provided as soon as possible and will be the appropriate size. We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA

## Reporting, Recordkeeping, and Access

It is district policy to:

- Report information about COVID-19 cases at the 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 the written COVID-19 Prevention Program 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.

## Exclusion of COVID-19 Cases

The district will follow the latest CDPH, Sutter County Public Health, and Cal/OSHA guidance. For employees excluded from work, the district will provide employees with the information on Covid-related benefits. For employees excluded from work, the district shall continue and maintain an employee's earnings, seniority, and all other employee rights and benefits as if the employee had not been removed from their job. The district may use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation. This does not limit any other applicable law, employer policy, or collective bargaining agreement that provides for greater protections

## Return-to-Work Criteria

The district will follow the latest CDPH, Sutter County Public Health, and Cal/OSHA guidance.

### Close Contact:

The district will follow CDPH, Sutter County Public Health, and Cal/OSHA guidance

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Tracey McPeters, Superintendent/Principal

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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:** \_\_\_\_\_

**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

*Make copies as needed*

## Appendix B: COVID-19 Inspections

Date: \_\_\_\_\_

Name of person conducting the inspection: \_\_\_\_\_

Work location evaluated: \_\_\_\_\_

Exposure Controls	Status	Notes	Person Assigned to Correct	Date Corrected
<b>Engineering</b>				
Ventilation (amount of fresh air and filtration maximized)				
<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				
Face coverings (cleaned sufficiently often)				
Gloves				
Face shields/goggles				

*Make copies as needed*

## 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.

Staff involved in investigation:		Date investigation initiated:	
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Employee name:		Was COVID-19 test offered?	
Date of the positive or negative test and/or diagnosis:		Occupation/Location employee worked:	

Date and time the COVID-19 case was last present in the workplace:		Workplace locations that may have been visited by the COVID-19 case during the high-risk exposure period	
Who may have been exposed			

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:	





## Appendix F: Multiple COVID-19 Infections and COVID-19 Outbreaks

*Appendix E applies only if the 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 the workplace within a 14-day period (see [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

The district will provide COVID-19 testing to all employees, during paid time, in the 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 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.

COVID-19 testing consists of the following:

- All employees in the 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, the district 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 the workplace for a 14-day period.
- Additional testing will be provided when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

1. We give notice to employees in the exposed group of their right to request a respirator for voluntary use.
2. We evaluate whether to implement physical distancing of at least six feet between persons.

### Exclusion of COVID-19 Cases

Meridian Elementary 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

The district 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:
  - 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.
- 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.
  - Requiring respiratory protection in compliance with section 5144..

### **Buildings or Structures with Mechanical Ventilation**

The district 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, filters with the highest compatible filtering efficiency will be used. 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, if so, implement their use to the degree feasible.

### **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 district's contract tracer will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.

The district 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.