

# **Larchmont Charter School**

## **COVID-19 Prevention Program**

### **(CPP)**



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

**Date: December 15, 2020**

## **AUTHORITY AND RESPONSIBILITY**

**Esmeralda Sandoval, Director of Compliance & Operations** 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Participating in staff workgroups within different grade spans, the Employee Advisory Group meetings, and staff surveys where they can share concerns and identify possible solutions.

## **EMPLOYEE SCREENING**

We screen our employees by:

Implementing daily symptoms screenings, which includes a temperature check and a symptoms questionnaire, prior to leaving their home (within 2 hours of arriving to work) to ensure that they are healthy to come to work. If employees are unable to complete the screening at home then an in person screening will be conducted using the same questionnaire and temperature check with a contactless thermometer. Also, all staff are required to wear a medical grade face covering while on school grounds which is included during the screening process.

## **CORRECTION OF COVID-19 HAZARDS**

Unsafe or unhealthy work conditions, practices or procedures will be documented on the *Appendix B: COVID-19 Inspections* form, and corrected in a timely manner based on the severity of the hazards, as follows:

- The severity of the hazard will be assessed once it is known and correction time frames assigned, accordingly by the school leaders, office staff and facilities team.
- Depending on the severity of the hazard, follow-up occurs during weekly check-in meetings.

- 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:

- Having the option of staff work from home, if their job description allows it.
- Reducing the number of persons in an area at one time, including visitors.
- Measuring the classroom and office spaces to determine the capacity of the space while being 6 feet apart.
- 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.
- Adjusted work processes or procedures to allow greater distance between employees.

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

### **FACE COVERINGS**

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) and of the Los Angeles County Department of Public Health (LACDPH).

Larchmont Charter School is requiring all staff to wear a disposable surgical mask while on campus, which are available in the main office. For staff that is unable to maintain six feet of distance from others must also wear a face shield or goggles. If the disposable masks should get soiled or torn then disposable masks are available in the main office. Along with this, we have provided staff with 2 reusable cloth masks and have instructed them to wash their masks frequently.

If employees encounter others not wearing a face covering while on school grounds, they can either remind them of our school's policy and direct them to the main office should they not have a face covering of their own. Or if an employee does not feel comfortable approaching a person, then the employee should notify the office staff immediately.

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 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.

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 and we would need a note from a medical doctor.

### **ENGINEERING CONTROLS**

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

LCS COVID-19 Prevention Plan

- Plexiglass barriers have been placed in the main office and staff will also have one in their classroom/office.
- Staff has been given a face shield to wear along their disposable surgical mask.
- Goggles are also offered in lieu of face shields.
- If staff is supporting students or staff that have COVID-like symptoms while on campus, then they are given additional PPE like gloves and gowns for their protection.

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

- If the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke then we will quickly support each classroom/office.
- The facilities team is ensuring that proper preventative maintenance is being performed on all air conditioning units and is changing filters on a regular basis. Merv-13 grade filters have been installed in the appropriate areas.

## **CLEANING AND DISINFECTING**

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

- Cleaning and disinfecting supplies are adequately stocked and restocked when necessary.
- Staff will be cleaning frequently-touched surfaces at school, including, but not limited to:
  - Classrooms
  - Offices
  - Handrails
  - Door handles
  - Light switches
  - Elevators
  - Sink handles
  - Shared tables, desks, or chairs
- High touch areas will be cleaned on an average of 2-3 times/day, depending on the need of spaces that are being used.

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

- Disinfecting the space(s) that have been identified that the staff member with a positive case was on campus within the 48 hours prior to the onset of Covid symptoms or of testing positive if the staff member was asymptomatic.
- The disinfection products approved for use against COVID-19 on the Environmental Protection Agency (EPA) - approved list "N".
- We will be using the [Cleaning and Disinfecting Matrix](#) from LACDPH as a guide for deep cleaning.
- Staff using the cleaners and disinfectants have been trained via the CA Department of Pesticide Regulation to meet the requirements of the Healthy Schools Act.
- We also have the choice of using the disinfectant fogger as well.

## **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 using the disinfectant wipes or cleaner that has been placed in every classroom and office. Each staff member will be supporting the high touch area cleaning and have been training with the CA Department of Pesticide Regulation and are using the appropriate ELA List N products.

## **HAND SANITIZING**

Staff should wash their hands frequently throughout the day or use hand sanitizer when hand washing is not practicable to help prevent the spread of COVID-19.

- Staff should wash their hands for at least 20 seconds with soap, rubbing hands thoroughly or use hand sanitizer that contains a minimum of 60% alcohol (ethyl alcohol-based).
- Staff should wash their hands:
  - Before and after eating
  - After coughing or sneezing
  - After using the restroom
  - Before and after any group activities
  - After outdoor play
- Multiple hand sanitizing stations are available throughout the campus, including the front entrance of the school, in each classroom, main office, and anywhere else where people have direct interactions with others and an extra portable handwashing station has been installed.
- Signage has been placed around the school site to remind everyone of good hygiene practices.

## **PERSONAL PROTECTIVE EQUIPMENT (PPE) USED TO CONTROL EMPLOYEES' EXPOSURE TO COVID-19**

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

## **INVESTIGATING AND RESPONDING TO COVID-19 CASES**

This will be accomplished by using questions on *Appendix C: Investigating COVID-19 Cases* form to be able to complete our internal COVID-19 Employee Tracker.

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

- Offered COVID-19 testing at no cost during their working hours.
- Staff will have the option to go to their healthcare provider, City/County site or a clinic.
- Given the information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

## **SYSTEM FOR COMMUNICATING**

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to their supervisor and Human Resources (HR), preferably via email.
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures and policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees can access COVID-19 testing via their healthcare provider, a local clinic and even through the Los Angeles City and County COVID-19 testing sites, which can be found here: <https://covid19.lacounty.gov/testing/>
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

- Notification of site locations/times/date where a person who tested positive for COVID-19 was within the 48 hours prior to symptoms onset or testing positive if asymptomatic will be posted at the sign-in/check-in area of the school in case they were not identified as a close contact. If an employee, visitor, or vendor feels that they may have been exposed during the specified time, date and location, they are to contact the School Leader who will then contact HR.

## **TRAINING AND INSTRUCTION**

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

A training roster will be used to track the employees who have been trained.

## **EXCLUSION OF COVID-19 CASES**

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by providing the employee with information on Workers' Compensation benefits, the Families First Coronavirus Response Act (FFCRA), and options for wage replacement- ie Sick Leave pay.
- Providing employees at the time of exclusion with information on available benefits.

## **REPORTING, RECORDKEEPING, AND ACCESS**

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection

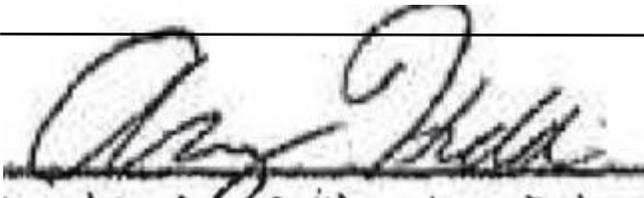
with any employment.

- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees and to representatives of Cal/OSHA immediately upon request.
- Use the COVID-19 Employee Tracker to keep a record of and track all COVID-19 cases. The information will be made available to employees 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 10 days from the time the order to quarantine was effective.
- 

---



**Amy Held, Executive Director**

**2.1.21**

**Date**

## **APPENDIX A: IDENTIFICATION OF COVID-19 HAZARDS**

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: **[enter name(s)]**

Date: **[enter date]**

Name(s) of employee and authorized employee representative that participated: **[enter name(s)]**

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**

This is a sample, review the information available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/) for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace.

Date: **[enter date]** Name of person conducting the inspection: **[enter names]**

Work location evaluated: **[enter information]**

<b>Exposure Controls</b>	<b>Status</b>	<b>Person Assigned to Correct</b>	<b>Date Corrected</b>
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<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			
<b>[add any additional controls your workplace is using]</b>			
<b>[add any additional controls your workplace is using]</b>			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
<b>[add any additional controls your workplace is using]</b>			

## **APPENDIX C: INVESTIGATING COVID-19 CASES**

***At Larchmont Charter, we are keeping an internal COVID-19 Employee Tracker of cases and of those under investigation.***

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.

**SAMPLE:**

**Date:** [enter date]

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

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

<p><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></p>			
<p><b>Notice given (<i>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:</i></b></p>			
<p><b>All employees who may have had COVID-19 exposure and their authorized representatives.</b></p>	<p><b>Date:</b></p>		
	<p><b>Names of employees that were notified:</b></p>		
<p><b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b></p>	<p><b>Date:</b></p>		
	<p><b>Names of individuals that were notified:</b></p>		
<p><b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b></p>		<p><b>What could be done to reduce exposure to COVID-19?</b></p>	
<p><b>Was the local health department notified?</b></p>		<p><b>Date:</b></p>	

\*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 buildings or structures with mechanical ventilation, 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**.