

# COVID-19 Prevention Program (CPP) for The Waldorf School of San Diego

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

**Date:** 1/22/2021

## Authority and Responsibility

Rachel Davis, Administrator, 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.
- Conduct regular meetings with our COVID Steering Committee to discuss effectiveness of current policies and procedures and plan for potential hurdles including but not limited to weather conditions.

## Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- Reporting any illness in the classroom to administration
- Monitoring supplies (sanitizer and PPE equipment) and requesting replenishment when needed
- Managing the use of PPE by students and those working or entering the classrooms

## Employee and student screening

We screen our employees and students by:

- Requiring a daily health screening
- Conducting temperature checks prior to entry on to campus

## 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:

We will assess the severity of the hazard and make correction accordingly.

- All facilities hazards will be corrected by our facilities teams
- All sanitation hazards will be corrected by our cleaning crew
- Any guideline hazards will be corrected by our Administrator or a member of our steering committee

## **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:

- Establishing cohorts and limiting the number of students and teachers in each cohort
- Eliminating the amount of cross over our teachers have with each cohort
- Conduct all instruction in open air outdoor spaces large enough to accommodate the cohort size
- Designate bathrooms to each cohort
- Establishing designated paths
- Reducing the number of visitors on campus by limiting persons to essential personnel only
- Staggered arrival, departure times

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) or local health department.

- We will require all employees and students to wear cloth or medical masks while on campus
- We will provide medical masks to any person attempting to enter campus without a mask
- We will provide replacement masks for any employee or student in need throughout the day
- We will not allow gators or ventilated masks to be used on campus

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**

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Individuals are required to wear masks.

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

- We have moved all classrooms to outdoor tents
- For indoor spaces used by personnel we have maintained routine service of vents and filters and request that when indoor space is in use that windows and doors are to remain open

## **Cleaning and disinfecting**

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

- Employee a contracting cleaning crew to perform daily cleaning including disinfecting of all indoor surfaces
- Purchased a sanitizing fogger that is used routinely in both indoor environments and on outdoor surfaces
- Requesting any additional need for surface cleaning throughout the day be reported to our facilities personnel

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

- Assess for exposure
- Do contact tracing
- Consider moving the cohort and/or the school to distance learning
- Sanitize the environment thoroughly
- Communicate any possible exposure to community using our community communication platform
- Establish a timeline of resuming normal activities

For high-risk exposure, our cleaning crew will coordinate off the area and disinfect all surfaces thoroughly. After cleaning is complete, they will fog the area as to cover any area not covered by surface cleaning.

## **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 our teachers or our cleaning crew.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

## **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Evaluating handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee and student handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees and students to wash their hands for at least 20 seconds each time.]

## **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 **Appendix C: Investigating COVID-19 Cases** form.

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

- Required to test for COVID. If a cost is incurred by the employee, they will be reimbursed.
- Benefits will be explained and offered accordingly in the event they must be away from work for a prolonged period of time

## **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 the Administrator
- That employees can report symptoms and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are offered the option to work from home if their job duties allow.
- Where testing is not required, employees can access COVID-19 testing through health plans or local testing centers. If cost is incurred by the employee, they will be reimbursed.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
  - If we are required to provide testing because of an exposure or an outbreak we will ask employees to use their medical providers testing site or a public health testing site. We will provide accommodations for testing if it needs to happen during normal working hours and provide reimbursement for any cost associated with this testing.
- Each section of our school has established standard operating procedures that are shared with every member of their section.

## **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 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.
- 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 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/school requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by employer-provided employee sick leave benefits.
- 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, 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/ School 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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**Rachel Davis, School Administrator**

1/27/21

**Date**