

# COVID-19 Prevention Program (CPP) for STANBRIDGE ACADEMY

## PURPOSE

The purpose of Stanbridge Academy's COVID-19 Prevention Program ("CPP") is to provide a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the Stanbridge Academy from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

## SCOPE

This CPP applies to all Stanbridge Academy employees except for those employees who are exclusively teleworking or subject to the Aerosol Transmissible Diseases ("ATD") program.

## DEFINITIONS

For the purposes of the CPP, the following definitions shall apply:

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

"COVID-19 case" means a person who either: (1) Has a positive "COVID-19 test" as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a "COVID-19 case" when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

"Close contact COVID-19 exposure" means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" as defined here. This definition applies regardless of the use of face coverings.

"COVID-19 hazard" means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly

result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. This can also include an offsite field location.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

“High-risk exposure period” means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten days after the specimen for their first positive test for COVID-19 was collected.

### **Authority and Responsibility**

Julie Smith, Head of School, 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 have implemented the following in our workplace:

- Workplace-specific evaluations (see Safe Re-Opening Plan).
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace as they occur.
- Review of applicable orders, general and industry-specific guidance from the Centers for Disease Control, State of California, Cal/OSHA, the San Mateo County Office of Education and the County of San Mateo Public Health related to COVID-19 hazards and prevention.
- Existing COVID-19 prevention controls in our workplace and we will evaluate the need for different or additional controls, as the need arises.
- Periodic inspections 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.
- Additional details on COVID-19-related protocols and procedures can be found in the [Stanbridge Academy Reopening Plan document](#) (updated January 2021).

### **Employee participation**

Employees and their authorized employee representatives are encouraged to continue to participate in the identification and evaluation of COVID-19 hazards.

### **Employee screening**

Our school employees will self-screen for COVID-19 symptoms when reporting to Stanbridge Academy's campus, worksite, or facility.

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

Unsafe or unhealthy work conditions, practices or procedures will be documented 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.

Stanbridge Academy's specific workplace methods include:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Assigned restrooms and break rooms.
- Students and teachers will stay in their assigned cohorts, and limit movement between classrooms as much as possible. No cohort will use indoor hallways.
- Classrooms have been arranged with six-foot spaces between student desks.
- Outdoor classroom areas will be used whenever feasible.
- Staff meetings will be conducted via Zoom, or outdoors with masks and appropriate physical distance.

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

### **Face Coverings**

We provide face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, 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 San Mateo County Health.

Employees are encouraged to contact their supervisor if they need additional face coverings or have any other concerns.

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 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 approved 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. Testing cannot be used in place of a face covering requirement for a non-approved reason. The twice weekly testing mentioned in this section is not on Stanbridge Academy time or reimbursable by the Stanbridge Academy.

### **Engineering controls**

We continue to implement the following measures for situations where we cannot maintain at least six feet between individuals: Develop cohort shifts to maintain office social distancing protocols, encourage teleworking where possible or reconfigure space if necessary.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. Stanbridge Academy takes all reasonable precautions to prevent the distribution of unhealthy air circulating through Stanbridge Academy facility air distribution systems. These precautions include performing regular preventive maintenance and filter changes, exclusive use of high efficiency air filters, and maximizing outside fresh air intake in the operation of our buildings' air distribution systems wherever possible (weather permitting).

Stanbridge Academy continues to perform extensive mechanical engineering analysis of existing HVAC systems.

### **Cleaning and disinfecting**

We continue to implement the CDPH and San Mateo County Pandemic Recovery Framework cleaning and disinfection measures for frequently touched surfaces as outlined in our School Reopening Plan, including:

- Place hand sanitizer dispensers in lobbies/common areas
- Prop doors open to reduce touching of handles as appropriate
- Provide disinfectant wipes in appropriate locations; post signage advising occupants to sanitize touch surfaces before and after each use
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.
- Ensuring adequate supplies and time for cleaning to be done properly.
- All classrooms have touchless hand sanitizers available.
- Bathrooms are all single-use facilities with touchless faucets, touchless soap dispensers, and touchless paper towel dispensers.
- No-touch water bottle filling stations are installed throughout campus.
- Disinfectant wipes are available in each classroom.
- Maintenance staff will clean classrooms and restrooms daily using approved cleaners and disinfectants.

- All students received their own personal school supplies, textbooks, workbooks, and an iPad/laptop for their individual use. Any shared classroom materials, technology devices, or toys will be cleaned by teachers between student use.
- HEPA air filtration in each classroom.
- High-powered exhaust fans in each classroom.

Should we have a COVID-19 case in our workplace, it is a priority that Stanbridge Academy facilities, the workplace, and school vehicles are maintained at the highest standard of cleanliness. Stanbridge Academy has directed the janitorial service providers using contract amendments to 1) conduct more frequent cleanings throughout the day in public spaces and common areas, as well as 2) use EPA-approved germicide/disinfectant products to ensure all surfaces and touchpoints in public areas and within the workplace are properly sanitized. A more detailed cleaning protocol is available from the Stanbridge Academy upon request.

### **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. All students received their own personal school and art supplies, textbooks, workbooks, and an iPad/laptop for their individual use. Any shared classroom materials, technology devices, or toys will be cleaned by teachers between student use. Where there must be sharing, the items will be disinfected between uses by the classroom teacher or aide. Items can be disinfected nightly by our cleaning crew as well.

### **Hand sanitizing**

We have implemented effective hand sanitizing procedures by:

- Evaluating handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer.
- Encouraging employees to wash their hands for at least 20 seconds each time.
- Adding touchless faucet handwashing stations located near or in each classroom.
- Teachers and students are directed to wash hands upon entering school for the day, after each period of activity, after recess, and before and after eating.
- Installing touchless paper towel dispensers by each handwashing station.
- Installing touchless hand sanitizer dispensers in each classroom.
- Providing facial tissues in every classroom.

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

We continuously 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**

Employees who have potential (close contact) **COVID-19 exposure in our workplace** will be (This section does not apply to those whose exposure did not occur in the workplace):

- Instructed to remain at or return to their home or place of residence and not return until such time as the employees satisfy the minimum criteria to return to work. Telework may be available at this time.
- Offered COVID-19 testing at no cost during their working hours.
- Will be provided with information on benefits continuation.

## **System for Communicating**

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

- Employees should report COVID-19 symptoms and possible hazards to their supervisor or Human Resources if they have any concerns. Employees can report symptoms and hazards without fear of retaliation or reprisal.
- Employee representatives should contact Human Resources to identify any hazards or concerns.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are encouraged to discuss options with their supervisor or Human Resources.
- Where testing is not provided or paid for by Stanbridge Academy, school employees can access COVID-19 testing through their primary healthcare provider or <https://www.smcgov.org/testing>.
- In the event that Stanbridge Academy is 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.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures will be documented and provided.
- Posting of our reopening plan on the school's website.
- Ongoing communication via email.
- Weekly e-newsletters from administration to all staff and parent community.
- Communications structure in-place to manage communication between school and the Health Department concerning cases of COVID-19 in the school community (see [Section VI of Reopening Plan](#)).

## **Training and Instruction**

We continue to 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.
- Daily monitoring of Stanbridge Academy students/staff: Look for signs of illness like flushed cheeks, rapid breathing or difficulty breathing, fatigue, or unusual irritability.
- Four (4) Stanbridge administrators completed a 30-hour Pandemic Coordinator Training through Joffe Safety Training, as well as Johns-Hopkins Contact Tracing class.

## **Exclusion of COVID-19 Cases**

### **Exclusion of COVID-19 Cases from Stanbridge Academy Worksites and Facilities**

Stanbridge Academy will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria. Telework may be available during this time.

### **Exclusion of Employees with Close Contact COVID-19 Exposures from Stanbridge Academy Worksites and Facilities**

Stanbridge Academy will exclude employees with close contact COVID-19 exposure from the workplace for 14 days after the last known close contact COVID-19 exposure. The school and employee will review options such as telework during this time, as appropriate.

### **Provision of Benefits to Stanbridge Academy Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure**

- **Employees Who Are Able to Telework During Isolation or Quarantine Period**  
Stanbridge Academy will allow employees who are able to telework, and are able and available to work, to telework during the isolation or quarantine period. The school will provide these employees their normal compensation for the work that they perform for Stanbridge Academy during the isolation or quarantine period.
- **Employees Who Are Unable to Telework During Isolation or Quarantine Period**  
The provision of benefits described below does not apply to either: (1) Stanbridge Academy employees who the school can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) Stanbridge Academy employees who are unable to work for reasons other than protecting employees and non-employees at Stanbridge Academy worksites and facilities from possible COVID-19 transmission.

For other employees, Stanbridge Academy will require that employees who are unable to telework, but are otherwise able and available to work, to use paid sick leave in order to receive compensation during the isolation or quarantine period. Stanbridge Academy employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The school may provide such employees who are unable to telework, but who do not have any paid sick leave available, other paid leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, Stanbridge Academy will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period. Stanbridge Academy may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA

leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

### **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 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
- 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.
- Keep a record of and track all COVID-19 cases. The information is made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## **Transportation**

### **Cleaning and disinfecting**

We will ensure that:

- All high-contact surfaces (door handles, seatbelt buckles, armrests, etc.) used by passengers are cleaned and disinfected before each trip.
- All high-contact surfaces used by drivers, such as the steering wheel, armrests, seatbelt buckles, door handles and shifter, are cleaned and disinfected between different drivers.
- We provide sanitizing materials, training on how to use them properly, and ensure they are kept in adequate supply.

### **Ventilation**

We will ensure that vehicle windows are kept open, and the ventilation system set to maximize outdoor air and not set to recirculate air. Windows do not have to be kept open if one or more of the following conditions exist:

- The vehicle has functioning air conditioning in use and the outside temperature is greater than 90 degrees Fahrenheit.
- The vehicle has functioning heating in use and the outside temperature is less than 60 degrees Fahrenheit.
- Protection is needed from weather conditions, such as rain or snow.
- The vehicle has a cabin air filter in use and the U.S. EPA Air Quality Index for any pollutant is greater than 100.

### **Hand hygiene**

We will provide hand sanitizer in each vehicle and ensure that all drivers and riders sanitize their hands before entering and exiting the vehicle. Hand sanitizers with methyl alcohol are prohibited.

## **Return-to-Work Criteria**

### **Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases**

Stanbridge Academy requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any school worksite or facility until they satisfy each of the following conditions:

- At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications; and
- COVID-19 symptoms have improved; and
- At least 10 days have passed since COVID-19 symptoms first appeared.

### **Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases**

Stanbridge Academy requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any school worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test

—OR—

If a licensed health care professional determines the person is not/is no longer a COVID-19 case, in accordance with California Department of Public Health (CDPH) or local health department recommendations.

### **COVID-19 Testing Not Required in Order to Return to Work**

In accordance with CDPH guidance concerning symptom-based strategies for the discontinuation of isolation, Stanbridge Academy does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

### **Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official**

If employees are subject to an isolation or quarantine order issued by a state or local health official, Stanbridge Academy requires that the employees not report to any school worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

### **Allowance by Cal/OSHA for an Employee to Return to Work**

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

In such cases, Stanbridge Academy will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the school worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.