

Model COVID-19 Prevention Program (CPP)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - 3205, COVID-19 Prevention
 - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - 3205.2, Major COVID-19 Outbreaks
 - 3205.3, Prevention in Employer-Provided Housing
 - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
 - The four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



November 2020

COVID-19 Prevention Program (CPP) for Tomorrow's Leadership Collaborative Charter School

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

Date: 2/22/2021

Authority and Responsibility

Jessica Tunney 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 and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: Notifying the office when policies and procedures are not being followed. The health and safety of TLC is our priority, and we encourage you to let the office know immediately if there is room for exposure on campus. Additionally, notifying the office when PPE gear is low or missing, cleaning isn't being done correctly or in a timely manner, or any other incident you feel can put the site at risk for exposure. Your cooperation is appreciated.

Employee screening

We screen our employees by a contactless method. Each morning you will check in at the check-in kiosk and self-temperature take and record your name, date, time or arrival, temperature and screening questions. If you answer yes to any of the questions or have a fever of 100.0 or higher, do not enter the site further. Every staff member must check in first thing in the morning and must wait 6 feet apart from each other.

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:

Each report should be sent to the covid19info@tlccharter.org email to report the hazards. The severity of the hazard will be assessed, and correction time frames assigned, accordingly.

Individuals who are identified as being responsible for timely correction will be the office staff.

Follow-up measures are taken to ensure timely correction. You will receive a response of the correction via email.

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:

TEACHERS & STAFF in the classroom

- Teachers and paraprofessionals will have to be in the classroom during school hours. We will encourage all staff to remain 6 feet apart when they can and if they cannot, they will wear the appropriate PPE gear to keep them safe.
- TLC will be reducing the number of persons in an area at one time, including visitors. TLC will now be a closed campus and families should not be let onto campus unless they have a scheduled meeting.
- Visual cues such as signs and floor markings to indicate where employees and others will be located or their direction and path of travel.
- Staggered arrival, departure, for students will be assigned. Multiple options for work, and break areas will be given.

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. Face coverings should be worn before entering campus. If you do not have a mask or need a replacement mask you can get one from the office. Additionally, we have N95 masks and face shields with draping for staff dealing with the public on a daily basis and staff that work with students who have difficulty keeping on masks. We also provided medical gowns and face shields with draping and gloves for staff who do diapering 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: **We have marked lines of blue to tape to show where you can not cross in the office. We also have partitions and sneeze guards for the front office. Each teacher's desk will be**

designated with their own desk shield/partition. Additional staff can request their desks/work areas be fitted with desk shields/partitions.

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

Keeping windows and doors open when there are more than two people in a room.

Keeping the air conditioners running to provide additional air flow.

Doors may need to be closed for reasons such as:

- Circumstances where the amount of outside air needs to minimize due to other hazards, such as heat and wildfire smoke.

Cleaning and disinfecting

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

- **The custodian provides multiple cleaning and disinfecting of high touch surfaces.**
- **Cleaning/disinfecting wipes are provided to each classroom along with disinfecting spray to be used in the classroom when needed.**
- **Ensuring adequate supplies and adequate time for it to be done properly.**
- **Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection**

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

- Notify the local public health department
- Isolate case and exclude from school for 10 days from symptom onset or test date
- Identify close contacts, quarantine and exclude exposed contacts; could be entire cohort for 14 days after the last date the case was present at school while infectious
- Recommend testing of contacts, prioritize symptomatic contacts
- Disinfection and cleaning of classroom and primary spaces where case spent significant time
- School will remain open

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 disinfecting wipes after each use.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

Have provided multiple hand sanitizing bottle all over campus and in each classroom and additionally have done the following:

- Evaluated handwashing facilities. Portable handwashing stations are placed around campus in addition to bathroom sinks.
- Determining the need for additional facilities and ordered accordingly.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees 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.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

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:

Contacted with the following information:

- Offered places where they can get COVID-19 testing at no cost during their working hours.

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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how. **You should report cases of COVID-19 and exposure to COVID-19 to Jessica Tunney and Marce Garcia-Karsli immediately.**
- 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.
- Where testing is not required, how employees can access COVID-19 testing. **Testing can be done at the following sites:**
 - <https://occovid19.ochealthinfo.com/covid-19-testing> for testing kits
 - <https://occovid19.ochealthinfo.com/supersite> for drive thru testing
 - <https://lhi.care/covidtesting> walk up testing sites
- 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.
- 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.
- TLC is maintaining a COVID-19 spreadsheet of all student and staff that have been exposed or tested positive. This document is confidential and not to be shared.

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.
- Training and training materials that reflect new and updated policy and procedures.

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 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 recording days off and sick days used.
- 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 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.

Jessica Tunney

02/22/2021

Jessica Tunney
Executive Director

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: Marce Garcia-Karsli

Date: 2/22/2021

Name(s) of employee and authorized employee representative that participated: Yesica Valencia

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
Office area, doors, front desk, front drawer,	High contact times are mornings, mid-day break time and end of day.	Because the room is already small and have 3 permanent staff in the room, extra attention should be paid to how many additional people are in the office at any given time. No more than 2 other people should be allowed in the office when all 3 office workers are present.	Barriers, partitions, tape markers, signage
Front Gate, push bar, and door handle	Mornings for drop off and afternoon when parents pick up students.	Potential exposure by the outside public that come into contact with childcare workers.	Signage, tape markers for social distancing and mandatory mask wearing for anyone coming onto campus.
MPR, all door handles, counter tops, and desktops.	Morning time when staff are coming in and setting up.	This is a big room, but doors and door handles should be cleaned frequently because of the high traffic of staff in this room.	Opened doors for ventilation and barriers for staff working in the room.
Resource Room	Working hours from 7:30 am to 4:00 pm Monday - Friday.	This is a large room but has more working staff in this room. It also contains a bathroom which increases traffic in the room. Risk is to employees only room is not open to the public.	Large room with staff separated by at least 6 feet and barriers are used for staff sitting at the same table. Masks must be work when not speaking in classes. Additionally, door is kept open and a window is kept open during work hours to help with air flow.

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
Copy Room	Working hours from 7:30 am to 4 pm, Monday – Friday.	High touch areas on the printer itself in a warm room with no ventilation. Exposure risks to employees only, not open to the public.	One person at a time in the copy room. Staff must wear masks in the copy room and should wipe down the printer once used or use hand sanitizer before use.
Classrooms	Working hours from 7:30 am to 4 pm, Monday – Friday.	Exposure risk is to child care workers. Each classroom has 12 student and two adults	Each desk is provided a barrier and desks are spaced 6 feet apart with markers on the floor. Students and staff wear face masks during the day. Meals are eaten outside, and hands are washed frequently. Additional handwashing stations are in front of each classroom. Cohorts do not mix during the day. Air flow is provided by having 2 doors open at all times.
Bathrooms	Working hours from 7:30 am to 4 pm, Monday-Friday.	Exposure risk is to all that use the bathroom as it is being used by all adults on campus through the day.	Bathroom is cleaned multiple times a day including door handles.
Kitchen area	Working hours from 7:30 am to 4 pm, Monday - Friday.	Exposure risk is to anyone going in to prepare meals or heat up meals. Especially, microwave and counter tops.	Kitchen is cleaned multiple times a day in an effort to disinfected high touch surfaces on campus.