

# 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/OSHA 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/](http://www.dir.ca.gov/dosh/coronavirus/)



November 2020

# COVID-19 Prevention Program (CPP) for **Pope Valley UESD**

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

**Date: January 29, 2021**

## Authority and Responsibility

**Ken Burkhart, superintendent** 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 and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **engaging in discussion with the superintendent.**

## Employee screening

We screen our employees by: **daily self-check and reporting of symptoms to the superintendent. Superintendent and all employees maintain direct txt/voice communication links.**

## 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:

**When reported by any staff member to the superintendent, the superintendent will document and either directly or in-directly (through assignment of responsibilities) correction of the deficit.**

## 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:

- Reducing the amount of people in an area any time, prohibiting non-essential visitors.
- Visual reminders and signage for safe practices, including hand washing, wearing of face masks, and reporting concerns.
- Staggered arrival times for staff and students as appropriate.
- Reducing total hours on campus.
- Allowing students to “learn from home”

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. **Adult and child-sized paper/disposable and cloth washable masks are available for all students and staff at no cost and at all entrance locations, including the school bus.**

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room or outside (i.e. operating the tractor on the other side of campus).
- 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: **N/A – SIX FEET DISTANCE IS MANAGEABLE IN ALL LOCATIONS.**

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

- Opening all air exchange dampers to full extent possible
- Programming thermostats to maintain constant (24 hour/day) air exchange
- Suspending energy-efficiency procedures to “keep cold air in” with an air conditioner, by allowing encouraging propping open of doors and opening of windows whenever feasible

## Cleaning and disinfecting

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

- All cleaning and sanitizing supplies are maintained in stock with multiple vendors identified if needed to be restocked.
- Custodial staff time has been doubled since reopening post-COVID,
- All custodial/maintenance staff are authorized to requisition cleaning/sanitizing supplies or equipment

from office staff at any time. Office staff is empowered to use good judgement to purchase supplies that may be beyond normal use.

- All classroom, restroom, and workspaces are cleaning and sanitized at least daily, with high touch surfaced addressed multiple times a day

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

- A minimum of 48-hour **building** stand-down (isolation)
- A thorough extra cleaning and sanitizing of all surfaces

### **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 **wiping down with sanitizing wipes and providing hand sanitizer or immediate use.**

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- All sinks have soap and sanitizer, with automatic dispensers whenever possible. Each sink has an automatic dispenser has a backup manual dispenser.
- Each office and classroom space has additional hand sanitizer dispensers.
- Each student desk and staff work center has a personal hand sanitizer bottle with extra bottles located through the campus.
- Reminders to wash and sanitize hands when coming in and out of a classroom location
- Signs and classroom lessons include reminders for the appropriate methods of handwashing and sanitizing

### **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:

- Offered COVID-19 testing at no cost during their working hours.
- 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:

- Who employees should report COVID-19 symptoms and possible hazards to **the superintendent through text message, phone call, or email at any time day or night. All employees have the superintendent's phone number and email address.**
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or 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 through district/insurance provided at-home/workplace self-administered PCR testing and shipping away for results within three days (experience has shown to be by 5pm the next day). Additionally, staff and students will be provided weekly and on-demand on campus antigen testing beginning in February 2021.
- 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 staff and students will be provided an on-demand on-campus antigen test (starting in February 2021).
- 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.

## 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.
- Staff have access to online training on cleaning vs. sanitizing, workplace hazards, and other relevant topics.

**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 **taking no adverse action against employees and providing substitute coverage or ability to work remotely whenever possible.**

- 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.

---



Kenneth J. Burkhart,  
Superintendent/Principal/Teacher  
Pope Valley Union Elementary School District

1/31/2020

## 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

Review the information available at [www.dir.ca.gov/dosh/coronavirus/](http://www.dir.ca.gov/dosh/coronavirus/) for additional guidance.

Date: January 30, 2021

Name of person conducting the inspection: Kenneth J. Burkhart, Superintendent/Principal/Teacher

Work location evaluated: Pope Valley Elementary School

| Exposure Controls  | Status                | Person Assigned to Correct | Date Corrected |
|--|-----------------------|----------------------------|----------------|
| <b>Engineering</b>   |                       |                            |                |
| Barriers/partitions  | N/A                   |                            |                |
| Ventilation (amount of fresh air and filtration maximized)                                   | Completed and working |                            | August 2020    |
| Additional room air filtration   | Completed and working |                            | August 2020    |
| Set thermostats to recirculate air 100%  | Completed and working |                            | August 2020    |
| <b>Administrative</b>  |                       |                            |                |
| Physical distancing  | No problems noted     |                            |                |
| Surface cleaning and disinfection (frequently enough and adequate supplies)                  | No problems noted     |                            |                |
| Hand washing facilities (adequate numbers and supplies)                                      | No problems noted     |                            |                |
| Disinfecting and hand sanitizing solutions being used according to manufacturer instructions | No problems noted     |                            |                |
| <b>PPE (not shared, available and being worn)</b>  | Available             |                            |                |
| Face coverings (cleaned sufficiently often)  | N/A                   |                            |                |
| Gloves   | Available             |                            |                |
| Face shields/goggles   | Available             |                            |                |
| Respiratory protection   | N/A                   |                            |                |



## Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

**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> |  |

**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>Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:</b> |   |   |  |
|---|---|---|--|
| <b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>   | <b>Date:</b>                                    |   |  |
|   | <b>Names of employees that were notified:</b>   |   |  |
| <b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>   | <b>Date:</b>                                    |   |  |
|   | <b>Names of individuals that were notified:</b> |   |  |
| <b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>   |   | <b>What could be done to reduce exposure to COVID-19?</b> |  |
| <b>Was local health department notified?</b>  |   | <b>Date:</b>  |  |

\*Should an employer be made aware of a non-employee infection source COVID-19 status.

**Appendix D: COVID-19 Training Roster (MAINTAINED LOCALLY AND NOT POSTED ONLINE)**

Records maintained by Pope Valley Union Elementary School District and contracted online vendor.