

Model COVID-19 Prevention Program (CPP) Petaluma Joint Union High District

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 CPP template. Employers can also create a written CPP 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/



November 2020

COVID-19 Prevention Program (CPP) for Petaluma Joint Union High District

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

Date: February 19, 2021

Authority and Responsibility

Superintendent Gary Callahan 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.
- In addition to ensuring the above referenced measures, we have created in collaboration with our local health department an auxiliary COVID Safety Plan for each district site that outlines COVID hazard mitigation strategies.

Employee participation

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

The district has convened several employee committees to collaboratively identify and evaluate COVID-19 hazards and workplace conditions. These committees are comprised of certificated, classified, and management staff. From these committees subgroups were formed to review job-specific situations, including elementary teachers, secondary teachers, learning spaces (classrooms), and office spaces. The committees and subgroups remain active and meet regularly to identify and resolve any issues that arise.

Employee screening

Per CDPH guidelines, staff will be required to perform a daily wellness check/screening at home prior to coming to campus. Employees will use an online screening module in the ParentSquare communication application available to review the COVID-19 symptom list each day before leaving for school and confirm with an e-signature that they do not have a fever or symptoms of COVID-19 and have not had close contact with a known case.

A separate designated area for back-up screening will be available at all Petaluma City School (PCS) district sites for those who did not complete a screening at home. A screening station will be available at the front office of each school and in designated areas at each non-school district site (e.g. the District office). In-person screening at work sites is self-administered by the employee to limit contact and CDC compliant face coverings are required for all persons (staff, students, parents, or community members) who are at any district or school site (including school buses) unless otherwise exempted by the CDPH guidelines.

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.

- The severity of the hazard will be assessed and correction time frames assigned, accordingly.
- Individuals will be identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Petaluma City Schools has implemented a number of risk mitigation strategies and policies intended to minimize or eliminate employee (and student) exposure to COVID-19 hazards. We have conducted a thorough review of COVID-19 hazards across all district sites and have developed and implemented control measures to address those hazards using guidance from the California Department of Public Health, Cal/OSHA and the Sonoma County Department of Health Services. We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the scope and severity of the hazard. A comprehensive overview of our COVID hazard mitigation strategies can be reviewed in the corresponding document of our COVID Safety Plan.

Control of COVID-19 Hazards

Physical Distancing

Petaluma City schools has the following safety measures in place to ensure employees stay at least 6 feet apart where possible:

- Signs on walls to serve as a reminder to stay 6 feet away from others
- Tape/paint on floors and sidewalks in high traffic areas to indicate 6 feet distance
- One way routes in some hallways

Additionally, all staff and/or break rooms are closed. Employees are not permitted to eat together indoors. Staff are encouraged to either eat alone (e.g. in their own classroom for teachers) or outdoors safely distanced 6+ feet apart.

For positions that perform one-on-one legally required student testing (e.g. school psychologists, speech, nurses, educational specialist teachers, etc.) where occasions may warrant the employee to be within 6 feet of a student intermittently, PCS ensures a sufficient supply of proper PPE (e.g. shields, etc.) and risk mitigation strategies (plexi separators, etc.).

Employees who are able to work remotely are encouraged to do so. In all other instances, work areas have been reconfigured to support social distancing as much as possible. In work areas where greater than 6 feet distance is not possible, work stations have plexiglass separators, suitable ventilation and employees remain masked at all times. Additionally, the flow of operations for work procedures (e.g. for foodservice) has been reorganized to allow 6 feet of distance between employees while performing their job duties and/or reduce instances of contact within 6 feet.

Staff meetings, professional development training and any other activities involving staff are conducted with physical distancing measures in place, outside, or virtually (via Zoom), where physical distancing is not feasible.

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 require that employees bring and use their own 2-3-ply face covering. As a backup in case an employee forgets a mask or it gets lost or damaged while at the work site, extra masks are available in each classroom, school offices, all school buses, and the district office. We supply both adult and student sized masks, face shields, and shields with drapes, if applicable. We also make available to employees instructional resources regarding proper fitting, use, care, and cleaning for face coverings.

Employees are required to wear face coverings properly 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. Employees are encouraged to remind and assist fellow coworkers to adhere to this policy and respectfully communicate PCS policy to non-employees at a PCS site (e.g. visitors not wearing a face covering). If an employee has any questions or concerns about the PCS face covering policy, they are encouraged to address the matter with their supervisor and are entitled to do so privately, confidentially and without fear of reprisal.

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.
- 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:

To complement our ventilation and other risk mitigation strategies (e.g. hand hygiene, face coverings, etc.), we installed plexiglass barriers in common work areas where maintaining 6 feet of distance is difficult (e.g. multiple staff workstations in offices, counseling areas and classrooms, where applicable). We also supply portable plexiglass barriers and partitions that can be easily moved and redeployed to situations where maintaining physical distance is difficult.

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

In order to maintain safe environments and optimize ventilation and airflow we have installed Pelican

thermostats at all of our secondary schools, which allow for remote monitoring of all HVAC systems. With this access to monitoring and control, we ensure that ventilation/airflow systems are operating and room temperatures are within normal limits. HVAC units are checked on-site routinely to ensure proper operation, on a rotating schedule, which includes replacing air filters at a minimum of two times per year and new filters will be installed after bad air-quality events (e.g. wildfires). All of our HVAC units use upgraded air filters (MERV-13 where applicable).

In addition to normal air ventilation/airflow, we have purchased and provided Apache AIRROW Light 2000 Portable Air Treatment units that use a combination of HEPA filtration and UVC light (Decontamination) to clean the air in a room three times per hour. Each classroom and small learning space are equipped with a mobile AIRROW Light 2000. Site staff ensure equipment is turned on each morning and working, indicated by illuminated green light switch and the hum of the machine. If equipment is not working, then site staff will contact the PCS Maintenance & Operations Department to report the issue. Equipment that is not operational will be immediately replaced.

In addition, classroom doors and windows will be left open as much as possible, and all school buses will keep windows open to allow for increased airflow during student transportation to and from school.

Cleaning and disinfecting

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

Custodial staff clean and wipe high-touch surfaces with disinfectant twice daily and sanitize surfaces with an electrostatic sprayer each evening.

In addition to general high-touch surface cleaning during the day, custodial staff clean classrooms at the end of the day and sanitize surfaces with an electrostatic sprayer each evening.

Custodial staff will clean and sanitize bathrooms with an electrostatic sprayer three times daily and in the evening (in addition to daily cleaning, mopping, removing trash, etc.).

Custodial staff clean and wipe with disinfectant all staff and workrooms three times daily at 10:00 AM, 1:00 PM, and will sanitize surfaces with an electrostatic sprayer each evening.

All cleaning products and supplies are EPA-approved and inventory is closely monitored to ensure adequate supply. Further, school schedules once students return to in-person learning have been developed to allow adequate time for proper cleaning/sanitation. Cleaning products (e.g. disinfectants) are kept away from students and custodial staff is trained on proper use, application and requirements for cleaning, and disinfection.

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

PCS custodial staff and management have been trained on proper application and required cleaning protocols in the instance of a COVID case at a PCS site. As such, when a COVID case has been identified, PCS custodial staff (as opposed to an outside service) cleans and disinfects the areas where the COVID case spent a large proportion of their time. The cleaning and disinfection protocol includes use of an electrostatic sprayer and EPA-approved disinfection products.

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.

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

Hand sanitizing

Staff should wash their hands frequently throughout the day, including before and after eating; after coughing or sneezing; after classes where there is the potential to handle shared items, such as outside

recreation, art, or shop; and before and after using the restroom.

To safely meet that goal, the District assessed the need for additional hand washing stations beyond the regular facilities already available for hand hygiene at each site (e.g. bathrooms, classroom sinks, etc.). As a result of that assessment, the district purchased and installed handwashing stations at each campus/work site (if applicable) to serve the number of staff and students at each site efficiently and safely in a manner that minimizes movement and alleviates the possibility of congregating in restrooms as much as feasible.

The district has also purchased and distributed ample supplies of hand sanitizer for multiple sanitation stations at each campus/work site. In instances where handwashing is not possible or practicable, the District provides alcohol-based hand sanitizer containing at least 60% alcohol and adheres to the Centers for Disease Control and Prevention's and the U.S. Food and Drug Administration's safety and use guidelines. The District has not purchased any hand sanitizer that contains methanol (i.e. methyl alcohol) and closely monitors the inventory for all attendant hand sanitation products (e.g. soap, paper towels, trash receptacles, hand sanitizer, etc.) to ensure adequate supply and compliance with safety regulations.

Detailed instructions on proper hand washing and use of hand sanitizer is outlined in our *COVID-19 Safety Handbook* available for all employees (as well as students and families) in both English and Spanish. Additionally, employees have been trained on proper handwashing (e.g. scrubbing thoroughly with soap for 20 seconds). We have posted instructional videos and resources on proper hand washing techniques along with our COVID-19 Safety Handbooks on our district website (www.petalumacityschools.org).

Signage/visual reminders regarding regular handwashing and hand sanitizer are posted throughout campus. Hand sanitizer is located in every learning space on campus as well as entry points and work spaces for staff.

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.

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

We use our **Appendix C: PCS Illness/COVID-19 Positive Case or Close Contact Intake Report** included in to facilitate case investigation and response.

Employees who had potential COVID-19 exposure in our workplace are offered no cost options for testing at the District testing site or through their medical provider during their working hours. PCS also complies with Cal/OSHA requirements for response testing for exposed cases and outbreak testing for everyone weekly until no longer considered an outbreak.

Additionally, the PCS COVID-19 Coordinator assists employees who have a potential COVID-19 exposure in coordinating with Human Resources regarding benefits and training/instructional resources.

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, and how.
- 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, employees can access COVID-19 testing offered by Petaluma City Schools. The District will make free asymptomatic surveillance testing available to all employees on a periodic basis.
- 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. For symptomatic testing, the employee will be offered the opportunity to take a self-administered test offered by the District or get a test from their medical provider. We have developed and communicated a Rapid Response protocol led by our nursing staff and supported by our dedicated contact tracing teams to communicate outbreaks, conduct contact tracing and coordinate any testing required due to a workplace exposure.
- 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 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.

Appendix D: COVID-19 Training Roster will be used to document 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. If an employee

experiences a COVID-related work absence, PCS COVID-19 Coordinator works directly with the employee and their supervisor on establishing the proper quarantine period and testing time frame as stipulated by Sonoma County Department of Public Health and planning a safe return to work site/job duties. The Coordinator also assists the employee in working with Human Resources to determine leave options depending on each employee's particular situation and communication of all PCS-provide benefits and/or other means of maintaining earnings, rights or benefits where permitted by law and not covered by workers' compensation.

- 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.
- We maintain an internal, confidential spreadsheet 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.
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Gary Callahan, Superintendent

Date

Appendix B: COVID-19 Inspections

Date: **[enter date]**

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

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

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration (Apache AIRROW)			
Signage and Floor/Sidewalk Markings			
Administrative			
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			
Isolation Room or Area			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

Date of test:	<input type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Pending
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Does student/staff have any family/household members that attend/work at PCS? If yes, please provide names:	
Name:	School:

Please complete this form and provide to designated school site or department COVID-19 contact person. Refer to Rapid Response Communications Protocol for a list of COVID-19 designated contact persons.

Notes _____

Form filled out by: _____

Printed

Signature _____

Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature