COVID-19 Prevention Program (CPP) Regulations and Documents
COVID-19 Prevention Program (CPP) for Covina-Valley Unified School District

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

Date: February 1, 2021

Authority and Responsibility

Elizabeth Eminhizer, Ed.D - Superintendent, has overall authority and responsibility for implementing these CPP's provisions in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and ensuring employees receive answers to the program's questions in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies, and procedures, and maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in 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.

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 a COVID-19 Task Force. The Task Force is composed of District Employees, Association and Community Representatives, along with District administration and meets on a regular basis.

Employee screening

All students and staff complete an online home self-screening through Qualtrics before entering any school or District facility.

Correction of COVID-19 Hazards

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

District Personnel, Site administrators, and Supervisors are responsible for continuous inspection of the workplace. Potentially hazardous conditions are corrected when discovered and/or a work order is initiated to correct the potential hazard.
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:

District Personnel, Site Administrators, and Supervisors work with staff to implement staggered schedules or remote work options whenever practicable. Floor markings and directional arrows to allow for physical spacing directions and plexiglass barriers have been placed on all desks and workstations.

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 appropriately 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.

Employees have also been provided additional Personal Protective Equipment upon request. Employees who are not following the required guidelines concerning Personal Protective Equipment are addressed appropriately.

Engineering controls
We implement the following measures for situations where we cannot maintain at least six feet between individuals:

All district buildings and spaces have been physically measured to determine the maximum number of occupants allowed to maintain social distancing. In-office spaces where six-foot distancing could not be achieved, furniture was rearranged to meet the requirement. In areas where furniture could not be mixed, plexiglass dividers were installed to protect staff, students, and visitors. Signs posted with the maximum number of occupants will be displayed in every office, classroom, restroom, etc., to meet guidelines.

Measures are in place to promote optimal ventilation in the school. To the extent feasible, we maximize the quantity of outside air for our buildings with mechanical or natural ventilation systems.

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

The District has adequate supplies and personnel to ensure proper health and safety measures are in place to include disinfection and the sanitization of all classrooms, offices, buildings, and worksites in compliance with all mandated health and safety standards.

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

All areas including but not limited to classrooms or office workspace, are properly sanitized and disinfected by District staff immediately or as soon as physically possible.
Shared tools, equipment and personal protective equipment (PPE) are not shared between employees and items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools are not shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses. Sharing of vehicles will be minimized to the extent feasible, and high-touch points will be disinfected between users.

Hand Sanitizing
To implement effective hand sanitizing procedures, we ensure that sinks, including those in bathrooms, cafeterias/kitchens, classrooms, and offices, are functioning with water and stocked with soap and paper towels or hand dryers. The District provides hand soap and hand sanitizer for every classroom, office, work station, break room, and building entrances/exits at all schools.

Investigating and Responding to COVID-19 Cases
The District will work with the LA County Department of Public Health, Cal-OSHA, and the California Department of Public Health to investigate and respond to COVID cases.

Employees who had potential COVID-19 exposure in our workplace will be contacted and provided guidance per the LA County Department of Public Health, Cal-OSHA and the California Department of Public Health.

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 all District employees conducting the daily screening through Qualtrics. All employees can report symptoms and hazards without fear of reprisal and employees who may have had exposure are contacted and given current recommendations and information following the LA County Department of Public Health, Cal-OSHA, and the California Department of Public Health guidelines. Depending on the location and exposure circumstances, and with guidance from the Los Angeles County Department of Public Health, notifications are provided to the impacted departments or school sites. And, all notifications follow the guidelines for the privacy of staff under HIPAA.

Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness report to the Personnel Department.

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 following the LA County Department of Public Health, Cal-OSHA, and the California Department of Public Health guidelines.

Training and Instruction
We provide adequate training and instruction that includes COVID-19 policies and procedures to protect employees from COVID-19 hazards. This includes reviewing COVID-19 benefits, instructions on social distancing, handwashing, proper use of face coverings, daily self-screening and the importance of obtaining a COVID-19 test and not coming to work if the employee is sick or experiencing COVID-19.
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 and during this time continue and maintain an employee’s earnings, seniority, and all other employee rights and benefits whenever we’ve demonstrated that the COVID-19 exposure is work-related.

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 connection with any employment. Maintain records of the steps taken to implement our written COVID-19 Prevention Program following CCR Title 8 section 3203(b). Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and Cal/OSHA representatives immediately upon request.

Return-to-Work Criteria

COVID-19 cases with COVID-19 symptoms will not return to work until they have met the requirements per the LA County Department of Public Health/California Department of Public Health guidelines.

Elizabeth Eminhizer, Ed. D. Date Superintendent
Covina-Valley Unified School District
COVID-19 Infections and Outbreaks Requirements and Documents

*This will only become necessary if there is an outbreak as defined by the LACDPH.
Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees’ working hours.

COVID-19 testing consists of the following:
- All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
- After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
- We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP Investigating and Responding to COVID-19 Cases.

COVID-19 investigation, review and hazard correction

In addition to our CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
  - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing.
● Updating the review:
  ○ Every thirty days that the outbreak continues.
  ○ In response to new information or to new or previously unrecognized COVID-19 hazards.
  ○ When otherwise necessary.

● Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  ○ Moving indoor tasks outdoors or having them performed remotely.
  ○ Increasing outdoor air supply when work is done indoors.
  ○ Improving air filtration.
  ○ Increasing physical distancing as much as possible.
  ○ Respiratory protection.
  ○ [describe other applicable controls].

Notifications to the local health department

Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.

We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees’ working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP Exclusion of COVID-19 Cases and Return to Work Criteria, and any relevant local health department orders.
Investigation of workplace COVID-19 illnesses
We will comply with the requirements of our CPP Investigating and Responding to COVID-19 Cases.

COVID-19 hazard correction
In addition to the requirements of our CPP Correction of COVID-19 Hazards, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department
We will comply with the requirements of our Multiple COVID-19 Infections and COVID-19 Outbreaks Notifications to the Local Health Department.