



# BONITA UNIFIED SCHOOL DISTRICT

## COVID-19 Prevention Program (CPP)

### Authority and Responsibility

Kevin Lee, Assistant Superintendent Human Resources and Mark Rodgers, Senior Director Student Services/COVID Operations Coordinator have joint authority and overall 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

The district 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 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 immediately reporting possible hazards to their supervisor. Possible hazards can also be reported to Human Resources or to COVID Operations. Representatives from employee groups may participate in the monthly inspection process for possible COVID hazards.

### Employee screening

Employees participate in daily screening by reviewing the screening questions distributed by Human Resources prior to reporting to the workplace. All employees are instructed to stay home if they fail the daily screening.

## 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:

- The hazard will be identified and the nature of the hazard will be communicated to the proper district department:
  - For engineering issues, report to Facilities Department
  - For administrative issues, report to COVID Operations in the Student Services Department
- The responsible department will assign an employee or team to resolve the hazard and will establish a timeline for correction of the hazard.
- When the correction is complete, the completion date and the nature of the correction will be reported to Human Resources, COVID Operations, and authorized employees' representatives.

## Control of COVID-19 Hazards

### Physical Distancing

Signage has been provided to establish maximum safe occupancy for workspaces, lobbies, and conference rooms, and sites and departments have developed ways to conduct business outdoors or in doorways to maximize airflow.

The following guidelines have been established for when employees are present in a workspace:

- As feasible, maintain a physical distance of at least 6 feet among staff and between staff and students in all office, classroom, assessment and therapeutic environments.
- As feasible, work stations and student work areas/desks should be arranged with 6 feet of distance from other staff or students and student desks should be arranged with 3 feet of distance.
- Wear a face covering in all indoor spaces unless an employee has been granted an exemption.
- Avoid congregating for non-required activities as feasible.

These guidelines have also been established when interacting with the public:

- The counter at which staff-visitor interaction occurs may have a barrier installed.
- As feasible, waiting areas are assessed to determine maximum occupancy to maintain six feet of distancing and signs posted at the entrance indicating maximum occupancy.
- If a safe maximum occupancy cannot be reasonably maintained, then consider more controllable systems, such as seeing visitors by appointment.
- If possible, use different entry and exit doors to create one-way traffic into and out of the waiting area. The feasibility of this should also consider whether one-way traffic takes visitors through or near other works spaces.
- If possible, also consider alternatives to indoor spaces such as outdoor interactions in spaces protected from weather or stations established in doorways.
- Visitors must wear masks unless the visitor has been instructed by a health professional to not wear a mask or if the visitor is 2 years old or younger.
- If a visitor brings younger children with them, the children must remain directly adjacent to the visitor throughout the visit.

## Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and where required by orders from the California Department of Public Health (CDPH) or local health department. Disposable face coverings are available at the district office and in the office of each school site for use by employees as needed, or employees may supply their own disposable face coverings. Employees may be exempt from wearing a mask if they have submitted a mask exemption form signed by an authorized health services professional. Face shields are provided to employees in situations where there may be additional exposure risk, such as during a special education assessment. Sites can request additional disposable face coverings from the district office supply as needed.

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, if indoors, outside air supply to the area 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 and make use of transparent shields if feasible
- When an employee is exempt from wearing a face covering under current Cal-OSHA rules
- When an employee has an approved medical or mental health exemption from wearing a face covering

## Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: Situations that may require employees to be in close contact with other employees or students may utilize several ways to create additional protection against exposure to COVID-19, including the use of enhanced PPE such as a face shield, a gown or gloves, the use of transparent barriers, and conducting operations outdoors as feasible.

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

- Outside air actuators can be controlled remotely by HVAC techs and M&O supervisors to minimize hazards if needed.
- HVAC systems go to alarm status if system is not functioning properly. HVAC techs, Site Secretary, M&O Secretary and Supervisors can monitor HVAC function through the Pelican app.
- HVAC filters are being upgraded to MERV 13.

## Cleaning and disinfecting

The following cleaning and disinfecting protocols are in place:

A regular disinfecting and cleaning plan schedule will be in place for regular cleaning of common touch points [e.g. desks, doorknobs, doors, faucets, teacher desks, sinks, countertops, etc.], including:

1. Empty trash and replace liners
2. Dusting [cabinets, bookshelves, around doors, computers, printers, walls, remove cobwebs around windows and in corners of the room]

3. Clean/dry sinks including surrounding areas and disinfect
4. Wipe down and disinfect doorknobs, desk tops, shared surfaces and other common touch areas
5. Restock supplies [soap, paper towels and hand sanitizer]
6. Vacuum carpeted floors and mop tile floors

Additional procedures for restrooms:

1. Dust walls and ceiling
2. Sweep floors
3. Restock paper towels, soap, seat covers, toilet paper and feminine hygiene dispensers
4. Clean the restroom with all-in-one machine and disinfect all touch areas [toilets, urinals, wall dividers, sinks, mirrors and floors]

Procedures in areas where an employee or student has been identified as testing positive for COVID-19:

1. Close off areas used by people who are sick
2. Wait 24 hours before cleaning and disinfecting unless notification of illness was NOT due to Covid-19 [only cleaning staff will be allowed in the room during cleaning, using proper PPE]
3. Clean and disinfect all areas used by staff/students who are sick
4. Service A/C filters

General use cleaning supplies are also available in high-use areas or areas that house students to allow employees to more frequently clean high-touch surfaces such as desks and door handles.

All employees who use cleaning and disinfecting products are properly trained in their use. Site-based plans identify the location of cleaning supplies for each school.

Facilities works in collaboration with the purchasing department to ensure logistics for cleaning and disinfecting supplies and protective equipment.

### **Shared tools, equipment and personal protective equipment (PPE)**

PPE such as gloves, face shields, and masks are not shared among employees.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools are also not shared among employees, to the extent feasible.

Sharing of vehicles will be minimized to the extent feasible.

### **Hand sanitizing**

Employees are encouraged to wash hands frequently and to use hand sanitizer if a hand washing station is not available. This is communicated directly to employees through written memos and information posted on an internal website.

Hand sanitizer has been supplied for all offices and workspaces and is available at multiple locations within each building. Site-based plans identify the location of cleaning supplies for each school.

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

The district evaluates the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provides such PPE as needed.

When it comes to respiratory protection, the district evaluates the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

Additional PPE is provided to staff who may come in contact with an infectious individual, such as in a health office. Isolation areas have also been established on each campus to separate a potentially infectious individual while being evaluated or waiting for a parent/guardian to arrive.

All areas that have regular contact with the public have been equipped with transparent shields, and visitors are instructed to be only in designated waiting areas where distancing can be maintained and are required to wear a face covering, unless exempt under Los Angeles County guidelines.

In addition to PPE, settings that may require the removal of PPE in order to facilitate the process, such as an area for special education assessment, are equipped with transparent shields.

## **Investigating and Responding to COVID-19 Cases**

The district utilizes a contact tracing response by office staff, designated contact tracing staff or district health services staff to respond to situations in the workplace that may be related to COVID-19 exposure. The team is trained on Los Angeles County Department of Public Guidelines and district protocols for isolation and quarantine for persons testing positive for COVID-19 or who are showing symptoms that may be consistent with COVID-19 infection, and for persons who were a close contact with an individual who has tested positive for COVID-19.

Upon notification of a COVID-related situation, the contact tracing-response will include the following:

- Communicate with the involved employee to provide instructions on isolation or quarantine
- Provide guidance and sources of information from the public health department
- Communicate the situation to the site or department manager and, if appropriate, provide communication to the manager and union leadership in order to communicate to all building staff that there has been a COVID-positive case
- Include links to information on the district nondiscrimination policy and contact information for human resources for questions about leaves or absences
- Send required information to Los Angeles County Department of Public Health

COVID-related situations can be communicated from a site or department to the contact tracing team through a phone call, email or a central reporting system developed by the district.

COVID-related cases and follow-up steps are documented through electronic systems under the control of the Contact Tracing team and are available to the Assistant Superintendent of Human Resources, the COVID Operations Coordinator and their support teams.

## **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:

- Employees are instructed to report COVID-19 situations to their supervisor via phone or email, by using the daily active screener, or through the Single Point of Contact reporting system. Employees should report possible hazards to their supervisor via phone or email.
- Employees can report COVID-related situations and hazards without fear of reprisal.
- Employees with medical or other conditions that put them at increased risk of severe COVID-19 illness may work from home if feasible or may contact Human Resources to discuss options if working from home is not feasible.
- For employees seeking non-required testing, the district encourages them to contact their health care provider if available. The district also publishes a list of multiple local agencies that provide COVID-19 testing if a health care provider is not available or if a local location would be more convenient for the employee.
- 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 that 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

- An internal, employee-only website has been developed that provides access to all COVID-19 protocols and documents developed by the district.
- Each school site has developed a COVID-19 mitigation plan that is available upon request by an employee or student/family.

## Training and Instruction

The district will provide 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 and the importance of vaccination against COVID-19.
- Information on the employer's COVID-19 policies, how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

## Exclusion of COVID-19 Cases

When there is a COVID-19 case in our workplace, the district will limit transmission through the following steps:

*NOTE: for this plan a "COVID-19 case" is defined as 1) an individual who has tested positive for COVID-19, or 2) an individual who is showing symptoms that may be consistent with COVID-19 infection, or 3) an individual who has been in close contact with a person who has tested positive for COVID-19. This individual could be an employee or a student.*

*NOTE: Based on vaccination status, some employees or students may be exempt from exclusion protocols per the most current Los Angeles County Department of Public Health guidelines.*

- Ensuring that COVID-19 cases are excluded from the workplace until the return-to-work requirements are met
- Excluding employees with COVID-19 exposure from the workplace for the duration established in the

- most recent Los Angeles County Department of Public Health guidelines
- 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 using local funds to extended coverage for paid leave for all absences due to a COVID isolation or quarantine instruction from the district until February 26, 2021.
  - 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.
- Maintain electronic documentation of all COVID cases and follow up steps through the procedures established by the Contact Tracing team.

## Return-to-Work Criteria

- Unless exempt from isolation or quarantine due to vaccination status, 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
    - The duration established in the most recent Los Angeles County Department of Public Health guidelines has passed
  - Unless exempt from isolation or quarantine due to vaccination status, COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until the duration established in the most recent Los Angeles County Department of Public Health guidelines has passed
  - 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 10 days from the time the order to quarantine was effective.
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**Additional information on programs or district-specific protocols can be found at:**

<https://do.bonita.k12.ca.us/Updates-Covid-19/index.html>

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## 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, students, or members of the public.

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.

Person conducting the evaluation: \_\_\_\_\_

Date: \_\_\_\_\_

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

\_\_\_\_\_  
 \_\_\_\_\_

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

Date: \_\_\_\_\_

Name of person conducting the inspection: \_\_\_\_\_

Work location evaluated: \_\_\_\_\_

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions installed and in use			
Ventilation is available and in use			
Additional room air filtration			
Signage and markings for distancing			
Use of outdoor space as feasible			
Adequate washing facilities			
<b>Administrative</b>			
Following physical distancing protocols			
Following cleaning and disinfection schedule			
Following hand-washing protocols			
Following protocols for stable cohorts			
Standard PPE is available and in use			
Face coverings are being used properly			
Enhanced PPE (gloves, gowns, face shields) is available and in use as needed			
Face shields/goggles			
Respiratory protection is available and in use as needed			

