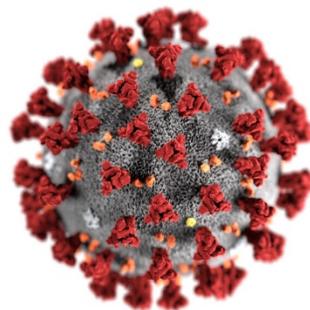




Covid-19 Prevention Program (CPP)



This COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. It has been prepared in compliance with AB685 and the Cal/OSHA Emergency Temporary Regulation for COVID-19 Prevention Requirements (8 CCR 3205).

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COVID-19 Prevention Program (CPP) for Gorman Learning Charter Network (all locations)

Date: February 8, 2021

Authority and Responsibility

The Administration Department 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 are encouraged to participate in the identification and evaluation of COVID-19 hazards by: remaining vigilant and aware of their surroundings. Report any hazards to the HumanResources@gormanlc.org or to Facilities@gormanlc.org.



Wear
your
mask



Wash
hands
often



Practice
social
distancing



Add
[CA COVID NOTIFY](#)
to your phone

Employee screening

Our employees are required to self-screen at home, according to CDPH guidelines, before coming to work. If an employee exhibits any of these symptoms, they are to remain at home and contact their supervisor and the Department of Human Resources at humanresources@gormanlc.org.



If an employee feels ill during the workday, they are to immediately notify their supervisor and leave work, and it is highly recommended that they contact their physician.

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.

Gorman Learning Charter Network has instituted controls identified in Appendix B, across all Gorman locations.

The Facilities Dept., along with site and department managers, will conduct hazard assessments in the workplace and correct hazards in a timely manner when they learn of deficiencies through spot checks, complaints, referrals, or reports of positive COVID-19 results.

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:

- Eliminating the need for workers to be in the workplace – e.g. telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including breakrooms, meeting rooms, and to include visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered break times.

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 each employee with 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. In addition:

- Employees will be provided with one cloth face mask. Additional disposable face coverings are available upon request from each employee's immediate supervisor.
- Employees are expected to have clean face coverings each day that they enter the building, to reduce the spread of germs.
- Should an employee encounter a non-employee without a face covering, the non-employee should be directed to the supervisor to receive a face covering.

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.

Engineering Controls

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

- Physical barrier installations (partitions) where feasible

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

- Ensuring our HVAC equipment is serviced quarterly.
- Cleaning and sterilization of all supply and return ducts throughout the building as necessary, using a disinfectant.
- Advanced notification to employees of HVAC work.

Cleaning and Disinfecting

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

- Cleaning and disinfecting is performed four nights a week either by the Facilities Department or an outside cleaning company, and include routine cleaning of offices and common areas, and spot sterilization (bathroom fixtures, door handles, etc.)
- Twice weekly the Facilities Department performs sterilization of all common areas and bathrooms, ensuring adequate time for the procedure to be accomplished.
- A deep cleaning and disinfection procedure is performed once a month, either by the Facilities Department or by an outside cleaning company.
- Additional deep cleaning is performed when circumstances dictate.
- Employees are notified in advance when a deep cleaning is to be performed.

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

- A deep cleaning is performed of potentially contaminated surfaces, by the Facilities Department.
- In the event that extensive disinfection is required that exceeds the capabilities of the Facilities Department, an outside contractor will be selected and deployed.

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 the employee. The Facilities Department provides approved disinfectant solution and supplies for department and employee use.

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

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Encourage and allow time for employee handwashing.
- Encourage employees to wash their hands for at least 20 seconds each time, with warm water.
- Hand sanitizing stations are provided at the entrance at each location, and in additional locations throughout each building.
- Handwashing facilities are available in the restrooms for all locations.

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

This will be accomplished by using the Appendix C: Investigating and Responding to COVID-19 Cases.

Employees who had potential COVID-19 exposure in our workplace receive the following:

- Notification of possible exposure, which contains information regarding locations of free testing sites.
 - Testing to be performed during employee's working hours
 - Mileage reimbursement available

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 shall immediately report Covid-19 symptoms and possible hazards to their supervisor or the Department of Human Resources. .
- The employee is advised to stay home and self-quarantine for 14 days and symptoms resolve.
- Employees report symptoms or positive test results to humanresources@gormanlc.org.
- Employees can report symptoms and hazards without fear of reprisal.
- Workplace hazards associated with COVID-19 can be reported directly to the Facilities Dept. at Facilities@GormanLC.org.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees can access COVID-19 testing by notifying their personal physician, or through local testing centers.
- In the event Gorman is 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.

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.

COVID-19 training records, for all required training, are maintained by the Department of Human Resources and are referenced in **Appendix D**.

Exclusion of COVID-19 Cases

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- 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 10 days after the last known 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.
- Information on employee benefits is available through the GLCN Department of Human Resources at humanresources@gormanlc.org. Providing employees at the time of exclusion with information on available benefit

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 information about all COVID-19 cases at our workplace to our Worker's Compensation carrier.
- 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.

This COVID-19 Prevention Program is formally approved by Denice Burchett, Executive Director of Gorman Learning Charter Network, on the date signed below:

Denice Burchett

Denice Burchett, Executive Director

02-09-2021

Date

This plan will be reviewed and updated periodically to ensure it reflects the most accurate interpretation of regulations and official guidance. Plan updates and approvals are listed below:

Date: _____, by _____

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.

Continuous safety improvement is encouraged by all employees and departments. To that end, this Appendix A: Identification of COVID-19 Hazards worksheet is included in this CPP for reference and use by any department. The Facilities Department is available to assist with hazard evaluations.

Date: [enter date] **Person conducting the evaluation:** [enter name(s)]

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

This form is intended to review COVID-19 protocols in campus worksites. Additional information available on the CalOSHA COVID-19 Guidance page at <https://www.dir.ca.gov/dosh/coronavirus/>. The Gorman Facilities Department conducts inspections of Resource Centers to determine compliance and follow guidance by the CDC and the State of California.

Date: **[enter date]** Name of person conducting the inspection: **[enter name(s)]**

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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

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.

When an employee tests positive for COVID-19, the following procedure is followed:

- Employee tests and finds a positive result
 - The Department of Human Resources is notified and the procedures regarding contact tracing are initiated;
 - Those known to have been in contact with the positive individual are contacted as part of the contact tracing protocols;
 - The individual is advised to notify the Department of Human Resources should they later come to realize that they indeed were exposed to, or contracted, the virus at work or during the commission of work duties.

Those who are positive or suspect that they have been in contact with someone who is positive are encouraged to contact Department of Human Resources. Those supervisors who are directly informed by an employee of any work related injury or illness, COVID-19 included, shall notify the Department of Human Resources immediately.

The Department of Human Resources, as well as GLCN's Worker's Comp provider, collect information on reports of positive COVID-19 cases. This includes the following information:

- Where the infected person worked or visited on campus during the infectious period
- The last date the person was at the workplace
- The infectious period as it relates to potential exposure of others in the workplace
- The date the person was tested for COVID-19, or became symptomatic
- The date the person's positive test result was obtained
- If the infection was acquired in the course of work, or contracted outside of work

Department of Human Resources contact tracing identifies and contacts potentially exposed persons and determines who might need testing or self-quarantine.

Department of Human Resources investigates incidents of workplace exposure through an interview with the appropriate manager or supervisor with workplace oversight responsibilities to determine what workplace conditions could have contributed to the exposure, and any corrective actions required. The Department of Human Resources will notify Cal/OSHA in the event of a serious employee illness or fatality per established protocols. If an employee becomes infected outside of work, Department of Human Resources still has an obligation to report a positive case in the workplace. The Department of Human Resources investigates reports of positive COVID-19 cases in the workplace, regardless of how the infection occurred.

Appendix D: COVID-19 Training Rosters

COVID-19 training will be provided through SafeSchools and also through CalOSHA. Department of Human Resources will assign the SafeSchools training to all employees, and all employees will also take Modules 1 through 7 of the the CalOSHA course located here: <https://trainingacademy.dir.ca.gov/covid-19-training-for-california-employers>

The Department of Human Resources will assign any additional COVID-19 training deemed necessary or as required.

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

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. It will be updated as necessary.

COVID-19 testing

- We will provide COVID-19 testing information 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 provided with information and recommend the employee be 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 recommend 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 information on 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.

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.

Additional Consideration #2

Major COVID-19 Outbreaks

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 information to employees to be tested for COVID-19 twice a week, 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**.

CDC Handwashing video:

<https://www.youtube.com/watch?v=d914EnpU4Fo&feature=youtu.be>

CDC Latest Information: <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

CDC stop the spread of germs:

<https://www.youtube.com/watch?v=03ly4d2tk3I>

CDC: Wear a Mask video:

<https://www.youtube.com/watch?v=OnilAuVvSwk>

CDC: Managing Anxiety and Stress:

<https://www.youtube.com/watch?v=BTx1vELv7zU>

CDC: Take care of your health during Covid-19:

<https://www.youtube.com/watch?v=OSie2SsVXqQ>

CDC: How to clean and disinfect your home if someone has

Covid-19: <https://www.youtube.com/watch?v=KHCrYOGkLMM>

CDC – Shopping for food and other household essentials:

<https://www.youtube.com/watch?v=ne4yQhY7NWA>