



## **COVID-19 Prevention Program (CPP) Imperial Unified School District**

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

**Date:** 2/16/2021

### **Authority and Responsibility**

Roger Ruvacalba 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.
  - Identify areas of traffic (i.e. lounge, library, restrooms, office, etc.)
  - Determine areas where six-foot physical distancing is not possible (entry gates, walkways, etc.)
  - Identify where barriers are needed to prevent the spread of COVID-19
  - Identify the use of shared items Evaluate the need for disinfecting supplies
  - Identify PPE needs Evaluate the exchange of supplies and materials process

- Evaluate the need for family education regarding IUSD COVID-19 guidelines

## **Employee Participation**

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

- Participating in weekly staff updates.
- Encouraging identification and reporting of COVID-19 hazards to their respective supervisor and/or District Administration.

Maintaining ongoing communication with school site administration. Employees are encouraged to report potential hazards and concerns to their supervisors.

## **Employee Screening**

We screen our employees by:

- Passive Pre-Screening: Employees complete a Catapult EMS COVID-19 pre-screen assessment which includes temperature reading and symptoms assessed prior to reporting to work.
- Active Screening On-Site: In-person touch-free temperature reading and verification of no symptoms.
- Face Covering: An internal check for appropriate face-covering upon check-in.

## **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:

Each COVID-19 hazard will be assessed by the Maintenance & Operation Manager and school site Administrator to determine the severity. The correction time frames will be assigned by an Administrator. A follow-up report will be conducted by the Maintenance & Operation Manager with the Superintendent and Administrator to ensure the timely correction.

## **Controls 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., Zoom or other remote work arrangements.
- Reducing the number of persons in an area at one time, including 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 arrival, departure, work, and break times.
- Adjusted work processes or procedures, such as reducing production speed, to allow a greater distance between employees.

Reference section 3205(c)(6) for details]

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.

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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:

Documented medical exemptions are the only allowance for staff members who cannot wear a face covering. All employees are responsible to maintain and monitor at least six feet or more of distancing from other staff members or students. If six feet distance cannot be maintained, the employee will notify their immediate supervisor to ensure that adequate distance can be established. Shields and partitions are available to be utilized as an extra layer of protection in addition to physical distance.

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

- Installed Ionizers in all of our Central AC systems in our facilities. This will improve the air quality of air being circulated through classrooms, offices, and other facilities. This system kills all viruses including Corona Virus by 99.9%.
- Evaluate all mechanical filters to increase the frequency of system filter change-outs.
- Change out filters regularly with new replacement filters to ensure units operate at maximum efficiency.
- Provide immediate repair to all operable windows to ensure proper function and can be opened to maximize outside airflow to internal spaces.
- Change all mechanical unit filters, both permanent and temporary, no less than twice per year or after an event that requires an immediate change after an event that results in higher than normal airborne toxins.
- Provide temporary shade structures and or tents to increase the opportunity to use outside spaces.
- Assess the effectiveness of a UV light disinfecting system or an alternative for future implementation.

## **Cleaning and disinfecting**

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

- Ensure adequate supplies and adequate time for it to be done properly.
- Inform the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection per CDC guidelines.
- Utilize cleaning and disinfecting products that meet CDPH standards and will be used frequently throughout the day in classrooms, restrooms, and other common spaces.
- Inventory of cleaning and disinfecting supplies is maintained within designated custodial rooms.
- Ensure custodial staff have been trained in the proper cleaning/disinfecting procedures related to COVID-19 and modifications have been made to their daily assignments to make sure all common areas and surfaces are disinfected throughout the day.

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

- Notify the local public health department.
- Isolate the infected area for 24 hours before disinfecting and cleaning.
- Provide employees with PPE (face covering, gloves, and eye protection) to conduct the disinfection and cleaning of the infected areas.
- Utilize products that meet EPA criteria for use against COVID-19 and are appropriate for surfaces. Follow the instructions on the manufacturer's chemical labeling to ensure the safe and effective use of the product.
- Ventilate by keeping all doors and windows open to increase air circulation.
- Walk-throughs by the Maintenance & Operations Manager and Administrator will conduct a final assessment prior to accessing the infected area for use.
- A third-party disinfecting company may be contracted depending on the extent and widespread of the exposure.

## **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:

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. The staff has been trained in the proper cleaning, sanitizing, and disinfecting of utensils, tools, and equipment. 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.

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## **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Students are required to wash their hands (for at least 20 seconds) at regular intervals. Staff is encouraged to wash their hands (for at least 20 seconds) throughout the day. Regular hand washing is preferred over the use of hand sanitizer and will be reinforced as the preferred method for healthy habits.
- Ethyl alcohol-based hand sanitizer has been provided to every classroom and common areas.
- An inventory list is maintained to track the usage and need for reordering as PPE or sanitizing supplies.
- Signage has been posted at each site that promotes healthy hygiene practices.
- Evaluate the handwashing stations on a regular basis.
- In process of implementing a touchless paper towel dispenser and hand soap dispenser at each hand washing station.

## **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. [reference section 3205(c)(E) for details on required respirator and eye protection use.]

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 COVID-19 Cases form.

Employees who had potential COVID-19 exposure in our workplace will be:

- An investigation is triggered if a student or employee responds YES to any question from the Daily COVID-19 Symptom Check-in/Questionnaire or exhibits any symptoms while on site. Staff who display COVID-19 symptoms at school must immediately inform their supervisor and will be sent home to await guidance from the COVID-19 Team.
- A temperature over 100.4 F during the temperature check for all staff and students may also trigger an investigation.
- Screening staff will be trained on screening protocols, use of screening equipment, and COVID-19 symptoms.
- Any student or staff member exhibiting signs of COVID-19 symptoms at the time of screening (i.e. 100.4) or above temperature, cough, shortness of breath or difficulty breathing, sore throat, new loss of taste or smell, chills, head or muscle aches, nausea, diarrhea, vomiting) will not be permitted on campus and will be referred to the COVID-19

Team.

- Investigations are also triggered when an outbreak of three or more per school site is reported to the COVID 19 Team.
- The students and staff members may be advised according to ICPHD Quarantine Guidance for COVID-19 close contacts.
- Students and staff will be provided information for testing and encouraged to follow ICPHD guidelines.
- Reporting will follow the Case Reporting by Schools Directive dated January 14, 2021.

## 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:
  - Employees should report COVID-19 symptoms and possible hazards to their immediate supervisor. Symptoms should be reported on the Catapult EMS-COVID-19 system and to the District Office at 760-355-3200.
  - Employees may access COVID-19 testing at the available testing sites Appendix 1: COVID-19 Testing Sites.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing:

- 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 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.
  - Any student, teacher, or staff member with COVID-19 symptoms should get tested. Common symptoms include fever, chills, cough, shortness of breath or difficulty breathing, fatigue (feeling tired), muscle or body aches, headache, loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting or diarrhea.
  - If an individual suspects they have symptoms, they should contact their doctor or health care provider to arrange for evaluation and testing.
  - COVID-19 Testing is available at no cost to 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 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 this training.

## **Exclusion of COVID-19 Cases**

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by

Employees will be contacted by the District Nurse Tanya Iten, when contact tracing to determine whether employees will need to quarantine.

Employees will be allowed to work from home when the situation allows when Quarantining.

Employees will be made aware of their sick leave benefits available at the time under state and federal guidelines.

- Providing employees at the time of exclusion with information on available benefits.

## **Reporting, Recordkeeping, and Access**

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## **Return-to-Work Criteria**

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - COVID-19 symptoms have improved.
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was

specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Superintendent

**Title of Owner or Top Management Representative**

**Signature**

**Date**

## Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

**Person Conducting the Evaluation:** Reopening Committee

**Date:** 1/11/21 & 1/20/21

**Name(s) of Employees and Authorized Employee Representative that Participated:**

Bryan Thomason, Roger Ruvalcaba, Gina Hendrix, Beatriz Fimbres, Summer Heraz, Traci Gibbs, Javier Ramos, Blanca Iniguez, Lori Campos, Joe Apodaca, Victor Cruz, Mark Rodriguez, Anita Olivos, Jerry Gonzalez. Sergio Rubio, Jessica Din, Genaro Sanchez and Joe Roman

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
Identify areas of traffic (i.e. lounge, library, restrooms, office etc.	On-going and as needed	IUSD employees and employees of other employers	Through education and signage
Identifying PPE Needs	On-going and as needed	All individuals entering IUSD sites	Purchase sufficient amount of PPE
Determining areas where six foot physical distances is not possible (entry gates, walkways etc.)	On-going and as needed	All individuals entering IUSD sites	Signage and additional barriers have been installed
Identify where barriers are needed to prevent the spread of COVID-19	On-going and as needed	All individuals entering IUSD sites	Purchase and install barriers
Identify the use of shared items	On-going and as needed	All individuals entering IUSD sites	Purchase and distribute additional instructional materials and supplies
Evaluate the need for disinfecting supplies	On-going and as needed	All individuals entering IUSD sites	Purchase and distribute additional disinfecting and cleaning supplies

Evaluate the exchange of supplies and materials process	On-going and as needed	All individuals involved in the exchange process	Organize and develop contactless distribution
Evaluate the need for family education regarding IUSD COVID-19 guidelines	On-going and as needed	All families within the IUSD community	Educate families regarding IUSD, County and State guidelines

## Appendix B: COVID-19 Inspections

**Date:** COVID-19 Team

**Name of Person Conducting the Inspection:** IUSD work sites

**Work Location Evaluated:**

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/Partitions	Purchased and Installed when necessary	Site Supervisors	On-going as needed
Ventilation (amount of fresh air and filtration maximized)	On-going maintenance	Maintenance Dept.	On-going as needed
Additional room air filtration	Purchased and Installed ionizers	Maintenance Dept.	On-going as needed
Office service windows	Installed where needed	Maintenance Dept.	On-going as needed
Hand-washing and hand sanitizing stations	Researching handwashing stations	Maintenance Dept.	In process
Additional drinking fountains	Researching drinking fountains	Maintenance Dept.	In process

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Administrative</b>			
Physical distancing	Signage and reminders are posted	Site Supervisors	On-going
Surface cleaning and disinfection (frequently enough and adequate supplies)	Completed daily and frequently	Custodial Staff	On-going
Hand washing facilities (adequate numbers and supplies)	Researching	Site Supervisors/Maintenance Dept.	On-going
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Installed and maintained	Site Supervisors/Maintenance Dept.	On-going
Daily pre-screening questionnaire/temp check	Completed daily	Site Supervisors	Daily

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>PPE</b> (not shared, available and being worn)			

Face coverings (cleaned sufficiently often)	Disposable and cloth face coverings are provided	Site Supervisors	On-going
Gloves	Disposable gloves are provided	Site Supervisors	On-going
Face shields/goggles	Provided and disinfectant provided for sanitation	Site Supervisors	On-going
Respiratory protection	Face shields are available for additional protection as needed	Site Supervisors	On-going
Contactless thermometers	Provided and disinfectant provided for sanitization	Site Supervisors	On-going
Gowns	Disposable gowns are provided as needed	Site Supervisors	On-going
Desk shields	Desk shields are provided for TK-6	Site Supervisors	On-going

## Appendix C: Investigating COVID-19 Cases

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

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

**Date:**

**Name of Person Conducting the Investigation:**

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	

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

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

**Appendix D: COVID-19 Training Roster**

**Date:**

**Name of Person Conducting the Training:**

Employee Name	Signature