COVID-19 Safety Plan
COVID-19 Prevention Program (CPP)

I. Purpose:
The purpose of the School's COVID-19 Prevention Program (“CPP”) is to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Lab. Code §§ 6300, et seq.) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the School from complying with federal, state, or local laws or public health order or guidance that may recommend or require measures that are more prescriptive and/or restrictive than those that are provided herein.

II. Scope

Unless one of the exceptions provided below applies, this CPP shall apply to all School employees (hereinafter referred to as “employees”).

The following employees are exempt from coverage under the CPP: (1) Employees who are teleworking from home or a location of the employee's choice that is not under the control of the School; (2) Employees who are working in or at a work location and do not have contact with any other individuals; and (3) Employees because of their tasks, activities, or work location have with occupational exposure as defined by the Aerosol Transmissible Diseases (“ATD”) regulation (i.e., 8 C.C.R. § 5199).

III. Definitions:

For the purposes of the CPP, the following definitions shall apply:

“COVID-19” means the disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

“COVID-19 case” means a person who either: (1) Has a positive COVID-19 test; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; (3) Has a positive COVID-19 diagnosis from a licensed healthcare provider; or (4) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

“COVID-19 Close Contact” means someone sharing the same indoor airspace (e.g., home, clinic waiting room, airplane etc.) for a cumulative total of 15 minutes or more over a 24-hour period (for example, three individual 5-minute exposures for a total of 15 minutes) during an infected person's (laboratory-confirmed or a clinical diagnosis) infectious period.

“COVID-19 hazard” means potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, or...
sneezing, or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids.

“COVID-19 symptoms” means one of the following: (1) fever of 100.0 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a test for SARS-CoV-2 that is:

(1) Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test);

(2) Administered in accordance with the authorized instructions; and

(3) To meet the return to work criteria set forth in Section IV.(J), a COVID-19 test may be both self-administered and self-read if the test result can be independently verified (e.g., the employee can provide a time-stamped photograph of the test result).

“Exposed group” means all employees at a work location, working area, or a common area at work, where a COVID-19 case was present at any time during the infectious period. However, if the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the infectious period, and all employees were wearing face coverings at the time the COVID-19 case was present, other people at the work location, working area, or common area would not constitute part of the exposed group. Common areas at work include bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. However, places where employees momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work.

“Face covering” means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they shall have two layers of fabric or be folded to make two layers. A face covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric. This definition includes clear face coverings or cloth face coverings with a clear plastic panel that, otherwise meet this definition and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker’s mouth or facial expressions to understand speech or sign language respectively.
“Infectious period” means the following time period, unless otherwise defined by California Department of Public Health (“CDPH”) regulation or order, in which case the CDPH definition shall apply:

- For symptomatic infected persons, 2 days before the infected person had any symptoms through Day 10 after symptoms first appeared (or through Days 5-10 if testing negative on Day 5 or later), and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved, OR

- For asymptomatic infected persons, 2 days before the positive specimen collection date through Day 10 after positive specimen collection date (or through Days 5-10 if testing negative on Day 5 or later) after specimen collection date for their first positive COVID-19 test.

“Respirator” means a respiratory protection device approved by the National Institute for Occupational Safety and Health (“NIOSH”) to protect the wearer from particulate matter, such as an N95 filtering facepiece respirator.

“Returned case” means a COVID-19 case who returned to work pursuant to Section IV.(J) and did not develop any COVID-19 symptoms after returning. A person shall only be considered a returned case for 90 days after the initial onset of COVID-19 symptoms or, if the person never developed COVID-19 symptoms, for 90 days after the first positive test. If a period of other than 90 days is required by a CDPH regulation or order, that period shall apply.

“Worksite,” for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the infectious period. It does not apply to buildings, floors, or other locations of the School that a COVID-19 case did not enter, locations where the worker worked by themselves without exposure to other employees, or to a worker’s personal residence or alternative work location chosen by the worker when working remotely.

IV. Program

A. System for Communicating with Employees

1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at School Worksites and Facilities

The School requires that employees immediately report to their manager or supervisor or to the COVID-19 Team (at covid19@ljcds.org) any of the following: (1) the employee’s presentation of COVID-19 symptoms; (2) the employee’s possible COVID-19 close contact exposures; (3) possible COVID-19 hazards at School worksites or facilities.

The School has not and will not discriminate or retaliate against any employee who makes such a report.
2. **Accommodations Process for Employees with Medical or Other Conditions that Put them at Increased Risk of Severe COVID-19 Illness**

The School provides for an accommodation process for employees who have a medical or other condition identified by the Centers for Disease Control and Prevention ("CDC") or the employees’ health care provider as placing or potentially placing the employees at increased risk of severe COVID-19 illness.

For all employees who request such an accommodation, including fully vaccinated employees, the School will require that the employee provide information from the employee’s health care provider explaining why the employee requires an accommodation.

The CDC identifies the following medical conditions and other conditions as placing or potentially placing individuals at an increased risk of severe COVID-19 illness.

The CDC guidance provides that adults of any age with the following conditions are at increased risk of severe illness from the virus that causes COVID-19:

1. Cancer
2. Chronic kidney disease
3. COPD (chronic obstructive pulmonary disease)
4. Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
5. Immunocompromised state (weakened immune system) from solid organ transplant
6. Obesity (body mass index [BMI] of 30 kg/m2 or higher but < 40 kg/m2)
7. Severe Obesity (BMI ≥ 40 kg/m2)
8. Pregnancy
9. Sickle cell disease
10. Smoking
11. Type 2 diabetes mellitus

The CDC guidance also provides that adults of any age with the following conditions might be at an increased risk for severe illness from the virus that causes COVID-19:

1. Asthma (moderate-to-severe)
2. Cerebrovascular disease (affects blood vessels and blood supply to the brain)
3. Cystic fibrosis
4. Hypertension or high blood pressure
5. Immunocompromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines

6. Neurologic conditions, such as dementia

7. Liver disease

8. Overweight (BMI > 25 kg/m², but < 30 kg/m²)

9. Pulmonary fibrosis (having damaged or scarred lung tissues)

10. Thalassemia (a type of blood disorder)

11. Type 1 diabetes mellitus

The School periodically reviews the following web address in order to account for any additional medical conditions and other conditions that the CDC has identified as placing or potentially placing individuals at an increased risk of severe COVID-19:

Employees are encouraged to review the list of medical conditions and other conditions provided above in order to determine whether they have such a condition.

To request an accommodation, employees may make a request with their manager or supervisor or the Director of Human Resources.

3. **COVID-19 Testing**

The School possesses authority to require that employees who report to work at School worksites or facilities be tested for COVID-19.

Where the School requires testing, the School has adopted policies and procedures that ensure the confidentiality of employees’ medical information and comply with the Confidentiality of Medical Information Act (“CMIA”). Specifically, the School will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, unless expressly authorized by the employee to disclose such information or as other permitted or required under the law.

4. **COVID-19 Hazards**

The School will notify employees and subcontracted employees of any potential COVID-19 exposure at a School worksite or facility where a COVID-19 case and employees were present on the same day. The School will notify employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

The School will also notify employees of cleaning and disinfecting measures the School is undertaking in order to ensure the health and safety of the School worksite or facility where the potential exposure occurred.
B. IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS AT SCHOOL WORKSITES AND FACILITIES

1. Screening Employees for COVID-19 Symptoms

The School possesses authority to require that employees self-screen for COVID-19 symptoms.

The School provides that employees will self-screen for COVID-19 symptoms prior to reporting to any School worksite or facility.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms during a self-screen, the employee must remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria in order to return to work (as discussed in Section IV.J. of this CPP).

The School will advise employees of any leaves to which they may be entitled during this self-quarantine period.

Further, the School has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA, and the School will not disclose to other employees the fact that the employees presented COVID-19 symptoms.

3. School’s Response to COVID-19 Cases

In the event that a School employee tests positive for COVID-19 or is diagnosed with COVID-19 by a healthcare provider, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

The School will advise the employee of any leaves to which they may be entitled during this self-isolation period.

The School complies fully and faithfully with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and entities as required based on the individual circumstances: (1) The local health department; (2) Cal/OSHA; (3) Employees who were present at a School worksite or facility when a COVID-19 case was present; (4) Employee organizations that represent employees at the School worksite or facility; (4) Employers of any subcontracted employees who were present at the School worksite; and (5) The School’s workers’ compensation plan administrator.

If possible, the School will interview the COVID-19 case(s) in order to ascertain the nature and circumstances of any contact that the employee(s) had or may have had with other employees during the infectious exposure period. If the School determines that there were any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).
The School has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA. Specifically, the School will not disclose to other employees, except for those who need to know, the fact that the employee(s) tested positive for or were diagnosed with COVID-19. Further, the School will keep confidential all personal identifying information of COVID-19 cases or persons, unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

4. **Workplace-Specific Identification of COVID-19 Hazards**

The School will periodically conduct workplace-specific assessments of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the School identified places (e.g., work locations, work areas, and common areas) and times when employees and individuals congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

The School will provide notice of any such potential workplace exposure to all persons at School worksites and facilities, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The School considered how employees and other persons enter, leave, and travel through School worksites and facilities, in addition to addressing employees’ stationary workspaces or workstations.

Further, the School will treat all persons, regardless of the presentation of COVID-19 symptoms or COVID-19 status, as potentially infectious.

5. **Maximization of Outdoor Air and Air Filtration**

For indoor School worksites and facilities, the School evaluates how to maximize the ventilation of outdoor air; provide the highest level of filtration efficiency compatible with the worksites and facilities’ existing ventilation systems; and whether the use of portable or mounted High Efficiency Particulate Air (“HEPA”) filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission.

6. **School Compliance with Applicable State and Local Health Orders**

The School monitors applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention.

The School fully and faithfully complies with all applicable orders and guidance from the State of California and the local health department.

7. **Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls**
Periodically, the School evaluates existing COVID-19 prevention controls at the workplace and assesses whether different and/or additional controls may be needed.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE) (as discussed at Section VI, subsections D, and F-H of this CPP).

8. Periodic Inspections

The School will conduct periodic inspections of its worksites and facilities as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the School’s COVID-19 policies and procedures, including, but not limited to this CPP.

C. Investigating and Responding to COVID-19 Cases in School Worksites and Facilities

1. Procedure to Investigate COVID-19 Cases

The School developed a procedure for investigating COVID-19 cases in the workplace, which provides for the following: (1) requesting information from employees regarding COVID-19 cases; (2) contact tracing of employees who may have had a close contact COVID-19 exposure; (3) requesting COVID-19 test results from employees who may have had a close contact COVID-19 exposure; (4) requesting information from employees regarding the presentation of COVID-19 symptoms; and (5) identifying and recording all COVID-19 cases.

2. Response to COVID-19 Cases

As provided above at Section IV.B.3., in the event that an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the School will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

a. Contact Tracing

If possible, the School will interview the COVID-19 case(s) in order to ascertain the following information: (1) the date on which the employee(s) tested positive, if asymptomatic, or the date on which the employee(s) first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 case(s) recent work history, including the day and time they were last present at a School worksite; and (3) the nature and circumstances of the COVID-19 case(s)’ contact with other employees during the infectious period, including whether any such contact qualifies as a close contact COVID-19 exposure.

If the School determines that there was or were any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP). Further, the School will instruct those employees to
be tested for COVID-19, and that the School will provide for such testing during paid time, as discussed in subsection c. below.

b. Reporting the Potential Exposure to Other Employees

The School fully and faithfully complies with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the individuals and entities described below.

Within one (1) business day of the time the School knew or should have known of a COVID-19 case, the School will give written notice of a potential workplace exposure to the following individuals: (1) All employees on the premises at the same worksite as the COVID-19 case during the COVID-19 case’s infectious period; (2) Independent contractors on the premises at the same worksite as the COVID-19 case during the COVID-19 case’s infectious period; and (3) Other employers at the worksite during the COVID-19 case’s infectious period. The School will provide notice by either personal service, email, or text message.

The School’s notice(s) will not reveal any personal identifying information of the COVID-19 case. The notice will include information about the School’s cleaning and disinfection plan.

c. Offer of Free COVID-19 Testing Following a Close Contact COVID-19 Exposure

The School makes COVID-19 testing available at no cost to employees and to all employees who had a close contact COVID-19 exposure at a School worksite. The School will offer employees COVID-19 testing during paid time, whether during the employee’s regular work schedule or otherwise, and will provide compensation for the time that the employee spends waiting for and being tested.

d. Leave and Compensation Benefits for Close Contact Exposures

The School provides employees that had a close contact COVID-19 exposure with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local law, the School’s own leave policies, and leave guaranteed by contract. The School will continue and maintain these employees’ earnings, seniority, and all other employee rights and benefits, including the employees’ right to their former job status, as if the employees had not been removed from their jobs.

The School may require that these employees use School-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers’ compensation.

e. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure
The School will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to such COVID-19 hazards, if any.

3. **Confidential Medical Information**

The School will protect the confidentiality of the COVID-19 cases, and will not disclose to other employees the fact that the employees tested positive for or were diagnosed with COVID-19.

The School will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

D. **Correction of COVID-19 Hazards at School Worksites and Facilities**

The School will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to the identification and evaluation of COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This also includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and PPE.

E. **Training and Instruction of Employees**

1. **COVID-19 Symptoms**

The School provides employees training and instruction on COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.0 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

The School monitors and adheres to guidance issued by the CDC concerning COVID-19 symptoms, including guidance provided at the following web address: https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html. The School will advise employees in the event that the CDC revises the symptoms that it associates with COVID-19.

In addition to providing training and instruction on COVID-19 symptoms, the School provides information and instruction on the importance of employees not coming to work if they have any COVID-19 symptoms. As discussed below, the School provides information on paid leaves to which employees may be entitled if they are experiencing a COVID-19 symptom and would like to be tested for COVID-19.
2. COVID-19 Vaccinations

The School provides employees information and instruction on the fact that COVID-19 vaccines are effective at both preventing the transmission of the virus that causes COVID-19 and preventing serious illness or death, and how employees may receive paid leave for reasons related to COVID-19 vaccinations.

As discussed below, the School provides information on paid leaves to which employees may be entitled in order for them to be vaccinated and in the event that they experience any illness or adverse effects as a result of such vaccination.


The School provides regular updates to employees on the School’s policies and procedures adopted in order to prevent COVID-19 hazards at School worksites and facilities, how such policies and procedures are intended to protect the health and safety of employees and School worksites and facilities, and how employees may participate in the identification and evaluation of COVID-19 hazards in order to make such worksites and facilities healthier and safer for themselves and others.

4. COVID-19-Related Benefits

The School advises and provides updates to employees on the leaves to which employees may be entitled under applicable federal, state, or local laws as well as the School’s own leave policies.

Further, when employees require leave in order to receive a COVID-19 test or to be vaccinated or are directed not to report to work by the School for reasons related to the presentation of COVID-19 symptoms, a COVID-19 case, close contact COVID-19 exposure, the School will advise the employees of the leaves to which the employees may be entitled for that specific reason.

5. Spread and Transmission of the Virus that Causes COVID-19

The School advises and provides updates to employees about the known spread and transmission of COVID-19. The School specifically advises employees of the following: (1) that COVID-19 is an infectious respiratory disease; (2) that the virus that causes COVID-19 can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; (3) that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including hand washing, in order to be effective; (4) that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and (5) that an infectious person may have no COVID-19 symptoms or be pre-symptomatic.

6. Hand Hygiene, and Face Coverings and Respirators
The School advises employees of the importance of physical distancing, face coverings, and hand hygiene, including hand washing, and instructs employees that the combination of physical distancing, face coverings, increased ventilation indoors, and respiratory protection make such preventative measures most effective.

With respect to hand hygiene, the School provides employees information regarding the importance of frequent hand washing, that hand washing is most effective when soap and water are used and the employees washes for at least 20 seconds. The School instructs employees to use hand sanitizer when employees do not have immediate access to a hand washing facility (i.e., a sink) and that hand sanitizer will not be effective if the employee’s hands are soiled.

With respect to face coverings and respirators, the School provides employees information on the benefits of face coverings, both to themselves and to others. The School also provides employees instructions on the proper use of face coverings and the differences between face coverings and respirators.

Upon request, the School will provide employees respirators for their use at work. At such time as the School provides respirators to employees for their use, it will provide such employees training on the proper use of such respirators, including, but not limited to, how to properly wear the respirator and the method by which employees may check the seal of such respirator in conformance with the manufacturer’s instructions.

The School will provide training on the conditions under which face coverings must be worn at the workplace and that employees can request face coverings from the School at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation.

F. FACE COVERINGS

1. General Face Covering Requirements

The School provides face coverings to all employees and requires that such face coverings are worn when required by orders from the CDPH.

The School adheres to the most restrictive or prescriptive public health order provided by the CDC, CDPH or the local health department applicable to the School, and will provide face coverings and ensure they are worn by employees when required by orders from the CDPH. Currently, face coverings are strongly recommended, but are required for employees allowed to be at the workplace while in an isolation or quarantine period.

The School requires that employee face coverings be clean and undamaged. The School allows employees to use face shields to supplement, not supplant, face coverings.

2. Limited Exceptions
The School provides for the following exceptions to the face coverings requirement when face coverings are required by orders from the CDPH:

1. When an employee is alone in a room (e.g., alone in an office or another space with walls that extend from the floor to the ceiling and a door that may be closed in order to close the space to others) or vehicle.

2. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent feasible.

3. Employees wearing respirators required by the School and being used in compliance with the regulatory requirements for the use of such respirators.

4. 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.

5. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.

3. Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement

When face coverings are required by orders from CDPH, the School requires that its employees who are exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

4. Prohibition on Preventing Employees from Wearing Face Covering

The School does not prevent any employee from wearing a face covering when wearing a face covering is not required by Section (IV)(F), unless wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

5. Communication to Non-Employees Regarding Face Covering Requirement

The School posts signage to inform non-employees of the School’s requirements concerning the use of face coverings at School worksites and facilities.

G. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Maximization of Outdoor Air
As provided above at Section IV.B.5., for indoor School worksites and facilities, the School evaluated how to maximize the quantity of outdoor air.

Further, for School worksites and facilities with mechanical or natural ventilation, or both, the School maximizes the quantity of outside air provided to the extent feasible, except when the Environmental Protection Agency (“EPA”) Air Quality Index (“AQI”) is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

2. Evaluation of Handwashing Facilities

In order to protect employees, the School evaluates its handwashing facilities in order to determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

The School encourages employees to wash their hands with soap and water for at least 20 seconds each time.

The School does not provide hand sanitizers with methyl alcohol.

3. Personal Protective Equipment (“PPE”)

a. Evaluation of the Need for PPE

The School evaluates the need for PPE in order to prevent employees from being exposed to COVID-19 hazards.

b. Provision of PPE When Necessary

The School provides PPE, including, but not limited to, face coverings, respirators, gloves, goggles, and face shields, to and for employees who require such equipment in order to perform their job duties in a healthy and safe manner, including where employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Upon request, the School shall provide respirators to employees for voluntary use to all employees who are working indoors or in vehicles with more than one person. Whenever the School makes respirators available for voluntary use, the School will provide employees with a respirator of the correct size and will provide such employees training on the proper use of such respirators, including, but not limited, the method by which employees may check the seal of such respirator in conformance with the manufacturer’s instructions, as discussed in Section IV.E.6.

4. Testing of Symptomatic Employees

The School makes COVID-19 testing available at no cost to employees with COVID-19 symptoms. This testing will be made available during the employees’ paid time.
H. REPORTING, RECORDKEEPING AND ACCESS

1. Reporting COVID-19 Cases To the Local Health Department

The School reports COVID-19 cases and COVID-19 outbreaks at School worksites and facilities to the local health department. Further, the School provides any related information requested by the local health department.

2. Maintenance of Records Related To the Adoption of the CPP

The School maintains records of the steps it has taken to implement the provisions described in this CPP.

3. Availability of the CPP for Inspection

The School makes this written CPP available to employees and employee organizations at School worksites or facilities. Further, the School will make this written CPP available to Cal/OSHA representatives immediately upon request.

4. Records Related to COVID-19 Cases

The School keeps a record of and tracks all COVID-19 cases with the following information: (1) employee’s name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.

The School keeps employees’ medical information confidential.

I. EXCLUSION OF COVID-19 CASES AND EXCLUSION OF EMPLOYEES WHO HAD A CLOSE CONTACT COVID-19 EXPOSURE

1. Exclusion of COVID-19 Cases from School Worksites and Facilities

The School ensures that COVID-19 cases are excluded from School worksites and facilities until the employee satisfies the minimum return to work criteria, as provided in Section IV.J.

2. Exclusion of Employees with Close Contact COVID-19 Exposures from School Worksites and Facilities

Using CDPH guidance, the school develops, implements, and maintains effective policies to prevent transmission of COVID-19 by persons who had close contact.

3. Provision of Benefits to Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis

   a. Employees Who Are Able To Telework During Isolation or Quarantine Period
The School allows employees who are able to telework to telework during the isolation or quarantine period. The School will provide these employees their normal compensation for the work that they perform for the School during the isolation or quarantine period.

The School continues and maintains such an employee's earnings, wages, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job.

b. Employees Who Are Unable To Telework During Isolation or Quarantine Period

The following employees are not entitled to the benefits described below: (1) Employees for whom the School can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) Employees who received disability payments or were covered by workers’ compensation and received temporary disability. Such employees may still use paid sick leave for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.

For other employees, the School requires that employees who are unable to telework, but are otherwise able and available to work, the School may use paid sick leave available to the employee for the purpose of continuing and maintaining the employee's earnings during the isolation or quarantine period. The School may use the employee's paid sick leave in order to continue and maintain the employee's earnings during the isolation or quarantine period.

Employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The School may provide such employees who are unable to telework, but who do not have any paid sick leave available, paid administrative leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the School will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable law or School policy that provides employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the School provides the excluded employees the information on paid leave benefits to which the employees may be entitled under applicable federal, state, or local laws.
This includes, but is not limited to any paid leave benefits available under workers’
compensation law, Labor Code sections 3212.86 through 3212.88, the School’s own leave
policies, and leave guaranteed by contract.

J.   RETURN TO WORK CRITERIA

1.   Minimum Criteria to Return to Work for COVID-19 Cases

The School requires that a COVID-19 case isolate and remain at their home or place of
residence and not report to any School worksite following their diagnosis as a COVID-19 case.

A COVID-19 case may discontinue isolation and return to School worksites after satisfying
either of the following two (2) return to work protocols:

   a.   Asymptomatic COVID-19 Cases or COVID-19 Cases with
        Resolving Symptoms

   COVID-19 cases, regardless of the employee’s vaccination status or previous infection, who do
not develop COVID-19 symptoms or whose COVID-19 symptoms are resolving (i.e., improving),
shall not return to work until satisfying the following conditions:

        (1)  At least five days have passed from the date that COVID-19
             symptoms began or, if the person does not develop
             COVID-19 symptoms, from the date of first positive
             COVID-19 test;
        
        (2)  At least 24 hours have passed since a fever of 100.0
             degrees Fahrenheit or higher has resolved without the use of
             fever-reducing medications; and
        
        (3)  A negative COVID-19 test from a specimen collected on the
             fifth day or later is obtained; or, if unable to test or the
             employer chooses not to require a test, 10 days have
             passed from the date that COVID-19 symptoms began or, if
             the person does not develop COVID-19 symptoms, from the
             date of first positive COVID-19 test.

   b.   COVID-19 Cases with Symptoms That Are Not Resolving

   COVID-19 cases, regardless of the employee’s vaccination status or previous infection, whose
COVID-19 symptoms are not resolving, shall not return to work until the employee satisfies the
following criteria:

        (1)  At least 24 hours have passed since a fever of 100.0
             degrees Fahrenheit or higher has resolved without the use of
             fever-reducing medication; and
        
        (2)  Symptoms are resolving or 10 days have passed from when
             the symptoms began.
c. Face Covering Requirements

Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case shall wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.

2. Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official

If employees are subject to an isolation or quarantine order issued by a state or local health official, the School requires that the employees not report to any School worksite until the period of isolation or quarantine is completed or the order is lifted.

If the relevant order did not specify a definite isolation or quarantine period, then the School will require that employees isolate or quarantine according to the applicable periods and criteria provided for in this Section or as otherwise instructed by the School.

3. Allowance by Cal/OSHA for an Employee to Return to Work

If no violations of state or local health officer orders related to the employee’s isolation, quarantine, or exclusion would result, the School may request that Cal/OSHA waive the quarantine or isolation requirement for essential employees and allow such employees to return to work on the basis that the removal of employees would create undue risk to a community’s health and safety.

Where the absence of an essential employee from the School’s worksite would cause a staffing shortage that would have an adverse effect on a community’s health and safety and pose an undue risk to the community’s health and safety as a result, Cal/OSHA may grant such waiver.

In order to request a waiver under such circumstances, the School will submit the written request to rs@dir.ca.gov. In the event of an emergency, the School may request a provisional waiver by contacting the local Cal/OSHA office while the School prepares the written waiver request.

The written waiver request must provide for the following information:

1. Employer name and business or service;

2. Employer point-of-contact name, address, email and phone number;

3. Statement that there are no local or state health officer orders for isolation or quarantine of the excluded employees;
4. Statement describing the way(s) in which excluding the exposed or COVID-19 positive employees from the workplace impacts the employer’s operation in a way that creates an undue risk to the community’s health and safety;

5. Number of employees required to be quarantined under the Cal/OSHA regulation, and whether each was exposed to COVID-19 or tested positive for COVID-19; and

6. The employer’s control measures to prevent transmission of COVID-19 in the workplace if the employee(s) return or continue to work in the workplace, including the prevention of further exposures. These measures may include, but are not limited to, preventative steps such as isolating the returned employee(s) at the workplace and requiring that other employees use respirators in the workplace.

In addition to submitting a request for a Cal/OSHA waiver, the School will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the School worksite and, if isolation is not feasible, the use of respirators in the workplace.
2022 COVID-19 School Guidance Checklist

Name of Local Educational Agency or Equivalent: La Jolla Country Day School
Number of schools: 1
Enrollment: 1,158
Superintendent (or equivalent) Name: Gary Krahn, Ph.D.
Address: 9490 Genesee Avenue, La Jolla, CA 92037
Phone Number: 858-453-3440
Email: gkrahn@ljcds.org
Date of proposed reopening: Already open
County: San Diego
Type of LEA: Independent (Private) School
Grade Level: Tiny Torreys, JK, K, 1, 2, 3, 4, 5, 6, 7, 8, 9,10,11,12

This form and any applicable attachments should be posted publicly on the website of the local educational agency (or equivalent) prior to reopening or if an LEA or equivalent has already opened for in-person instruction. For those in the Purple Tier, materials must additionally be submitted to your local health officer (LHO), local County Office of Education, and the State School Safety Team prior to reopening.

For Local Educational Agencies (LEAs or equivalent):
I, Gary Krahn, post to the website of the local educational agency (or equivalent) the COVID Safety Plan, which consists of two elements: the COVID-19 Prevention Program (CPP), pursuant to CalOSHA requirements, and this CDPH COVID-19 Guidance Checklist and accompanying documents, which satisfies requirements for the safe reopening of schools per CDPH Guidance on Schools.

I confirm that reopening plan(s) address the following, consistent with guidance from the California Department of Public Health and the local health department:

☑ Stable group structures (where applicable): How students and staff will be kept in stable groups with fixed membership that stay together for all activities (e.g., instruction, lunch, recess) and minimize/avoid contact with other groups or individuals who are not part of the stable group.

Please provide specific information regarding:
How many students and staff will be in each planned stable, group structure? (If planning more than one type of group, what is the minimum and maximum number of students and staff in the groups?)

If you have departmentalized classes, how will you organize staff and students in stable groups?

All departmental and elective courses follow the same cohort model as described above to minimize cross grade-level mixing.

If you have electives, how will you prevent or minimize in-person contact for members of different stable groups?

**Early Childhood Center**
The Early Childhood Center (ECC) follows the current state and county guidelines for preschool aged children. The Tiny Torrey and Jr. Kindergarten programs have up to 14 children with 3 grade-level teachers, physical education coaches, librarians, Spanish, and art teachers. Each grade level will keep to their assigned locations with their grade level peers.

**Lower School/Middle School/Upper School**
As the pandemic has progressed, grades K-12 no longer use a cohort model.

☑ **Entrance, Egress, and Movement Within the School:** How movement of students, staff, and parents will be managed to avoid close contact and/or mixing of cohorts.

The students in the Early Childhood Center students are allowed to move about campus for their specialty classes in the gym, on the LS playground and specialty classrooms. Faculty, students and visitors will be subject to health and safety and masking regulations as mandated by the CDC, Community Care licensing and Dept. of Health.

Parents and guardians are allowed on campus as visitors. and are also welcome on campus to support student activities and special events.

☑ **Face Coverings and Other Essential Protective Gear:** How CDPH’s face covering requirements will be satisfied and enforced for staff and students.

Masks are strongly recommended in all indoor spaces when students are present. Masks are optional indoors if students are not present. Masks are optional outdoors.
If an individual would like a face mask, one will be provided by the school. Cloth face coverings are recommended to be made out of breathable cloth materials, cover the entire nose and mouth area, and be secured to the head with elastic ties or straps. The School will provide some employees with surgical face masks, respirators, or personal protective equipment dependent (“PPE”) on the employee’s job duties.

All members of our community are aware of the public health guidelines, where face coverings are properly fitted over the nose and mouth, they prevent the wearer from dispersing potentially infectious aerosols and droplets into the environment where they can contaminate surfaces or be inhaled by others.

☑️ **Health Screenings for Students and Staff:** How students and staff will be screened for symptoms of COVID-19 and how ill students or staff will be separated from others and sent home immediately.

Students, faculty, and staff are expected to self-monitor and conduct a wellness screening each morning before coming on campus. They are not allowed on campus or to attend in-person campus events or activities when not feeling well. If symptoms arise during the school day, individuals will be sent home. Symptomatic individuals may return to campus after symptoms have improved, typically 24 hours fever-free without the use of fever-reducing medicine and a negative COVID-19 test.

☑️ **Healthy Hygiene Practices:** The availability of handwashing stations and hand sanitizer, and how their safe and appropriate use will be promoted and incorporated into routines for staff and students.

There are 225 touchless hand sanitizing stations and 137 handwashing stations across campus.

☑️ **Identification and Tracing of Contacts:** Actions that staff will take when there is a confirmed case. Confirm that the school(s) have designated staff persons to support contact tracing, such as creation and submission of lists of exposed students and staff to the local health department and notification of exposed persons. Each school must designate a person for the local health department to contact about COVID-19.

For faculty/staff, a trained LJCDS staff member will reach out to the individual who contracted COVID-19 to identify other individuals they may have been in close contact with. In the event of infection, contact tracing will occur, CDC protocols and local health guidance will be exercised and close contacts will be quarantined or allowed to remain at work per the latest San Diego
Country COVID-19 Decision Tree for K-12 Schools which can be found at https://covid-19.sdcoe.net/Health-Practices/Guidelines-for-Schools.

For students, a trained LJCDS staff member will perform group contract tracing to identify students that shared a common indoor airspace with a person who was contagious for COVID-19. In some cases (e.g., exposure during extracurricular activities) it is necessary to reach out to the individual who contracted COVID-19 to identify other individuals they may have been in close contact with. In the event of infection, contact tracing will occur, CDC protocols and local health guidance will be exercised and close contacts will be quarantined or allowed to remain at work per the latest San Diego Country COVID-19 Decision Tree for K-12 Schools which can be found at https://covid-19.sdcoe.net/Health-Practices/Guidelines-for-Schools.

The purpose of contact tracing is to promote public health efforts. The names of positive people will not be disclosed to the individuals with whom they may have had close contacts unless they are household members.

☑ Physical Distancing: How space and routines will be arranged to allow for physical distancing of students and staff.

The CDPH no longer mandates minimum physical distancing when other mitigation strategies (e.g., masking) are fully implemented. However, the School continues to encourage physical distancing.

Please provide the planned maximum and minimum distance between students in classrooms.
Maximum: N/A.
Minimum: N/A.

☑ Staff Training and Family Education: How staff will be trained and families will be educated on the application and enforcement of the plan.

Family Resources are located within this CDPH COVID-19 Guidance Checklist.

Staff training and information can be found at: https://www.ljcds.org/employee-return-to-work-plan

☑ Testing of Staff: How school officials will ensure that students and staff who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic staff testing cadence.
Asymptomatic Testing Program
The School no longer performs surveillance testing for asymptomatic staff members, but does provide PCR or rapid antigen testing for those asymptomatic staff members identified as close contacts.

Symptomatic Testing
The school will continue to test staff who are symptomatic with the rapid antigen test, which can provide results within 15 minutes or the PCR test.

☑ Testing of Students: How school officials will ensure that students who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results. Below, please describe any planned periodic asymptomatic student testing cadence.

Asymptomatic surveillance testing has been discontinued. The school may test students who are symptomatic with the rapid antigen test, which can provide results within 15 minutes or the PCR test.

☑ Identification and Reporting of Cases: At all times, reporting of confirmed positive and suspected cases in students, staff and employees will be consistent with Reporting Requirements or local public health guidance.

The School continues to access the necessary COVID-19 protocols for the 2022/2023 school year. As the protocols change, this checklist will be updated at that time.

☑ Communication Plans: How the superintendent will communicate with students, staff, and parents about cases and exposures at the school, consistent with privacy requirements such as FERPA and HIPAA.

In addition to county, state, and local health department reporting, confirmed positive cases of employees are reported to our worker’s compensation insurance company, Berkshire Hathaway Homestate Companies (BHHC). Work-related cases are noted and also reported to Cal/OSHA, as required.

☐ Consultation: (For schools not previously open) Please confirm consultation with the following groups
  ☐ Labor Organization
    Name of Organization(s) and Date(s) Consulted:
    Name: ________________________________
Date: ________________________________
☐ Parent and Community Organizations
   Name of Organization(s) and Date(s) Consulted:
   Name: ________________________________
   Date: ________________________________

If no labor organization represents staff at the school, please describe the process for consultation with school staff:
N/A

For Local Educational Agencies (LEAs or equivalent) in PURPLE:
   ☐ Local Health Officer Approval: The Local Health Officer, for (state County) _________________________________. County has certified and approved the CRP on this date: __________________. If more than 7 business days have passed since the submission without input from the LHO, the CRP shall be deemed approved.

Additional Resources:

Guidance on Schools

Safe Schools for All Hub