

COVID-19 Prevention Program (CPP)

August 05, 2022

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

Authority and Responsibility

The Superintendent 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.
- Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record. Employees are not required to submit vaccination status but are encouraged to do so voluntarily. Known vaccination status will be considered when quarantine and isolation practices are enforced
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace. All District employees must immediately notify their immediate supervisor or the District Safety Coordinator, Mr. Padilla, if they test positive or exhibit symptoms of COVID-19. The information will then be communicated to Mrs. Larios, Director of Administrative and Fiscal Services. The Safety Coordinator will conduct the contact tracing process and will provide direction to the affected employee in terms of next steps.
- 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 raise concerns regarding the identification and evaluation of COVID-19 hazards to their immediate supervisors and the District's Director of Maintenance Operations and Transportation (MOT).

Employee Screening

All Employees will self-screen daily using CatapultEMS, prior to arriving for work. Employees with COVID-10 symptoms, regardless of vaccination status or previous infection, should follow the [CDPH Guidance for Local Health Jurisdictions on Isolation and Quarantine of the General Public](#).

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the Appendix B: COVID-19 Inspection's form, and corrected in a timely manner based on the severity of the hazards, as follows:

The District will work to resolve all hazards in a timely manner. Hazards will be assessed for severity and will be prioritized based on these results. The District will strive to bring about as immediate a correction as possible, but there may be a need to first deal with more severe hazards.

The Maintenance Manager will work with other administrators to follow-up and ensure corrective measures are put in place to eliminate any hazards that are identified.

Controls of COVID-19 Hazards

Face Coverings Employees/ Students /Authorized Visitors

No person can be prevented from wearing a mask when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee, student or visitor that requests one.

Engineering Controls

For indoor locations, using Appendix B, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, 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 transmission by:

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

- Assuring accessible windows open and close to allow proper airflow
- Utilizing District Certified HVAC technicians to evaluate District Ventilation

- systems in accordance with ASHRAE
- Installed updated filtration systems in conjunction with the Imperial County Air Pollution Control District.
 - Replacing older HVAC units with more efficient units.
 - Upgraded HVAC system to web-based controls District-wide to better monitor indoor air quality for most units.
 - Upgraded to filtration filters to MERV 13.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we will:

- Train employees and encourage proper hand washing techniques (min. 20 seconds).
- Provide employees with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Provide disposable gloves to employees with limited access to hand washing or hand sanitizing. The disposable gloves are to limit hand contact with potentially contaminated surfaces.

Personal protective equipment (PPE) used to control exposure to COVID-19

We continuously 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.

Upon request, we will provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one person.

When it comes to respiratory protection, we will regularly 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.] The immediate supervisor will notify the District's Safety Coordinator who will then ensure that the requesting employee receives training on how to properly wear a respirator.

We provide and ensure use of eye protection and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids. We will ensure respirators are in compliance with section 5144.

Testing of Employees

We make COVID-19 testing available, at no cost, to employees who have been exposed in the workplace, of who have COVID-19 symptoms, regardless of vaccination status, during employees' paid time.

Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results, and onset of symptoms. This will be accomplished by using the Appendix C: Investigating COVID-19 Cases form.

We also ensure the following is implemented:

The Human Resources Department will provide employees:

- no cost options for COVID-19 testing during the workday to employees that have potential COVID-19 exposure in the workplace.
- direction for reporting COVID-19 testing results and direction regarding return-to-work directives.
- information on benefits described in Trainings and Instruction, and Exclusions of COVID-19 cases,
- written notice within 1 day of knowledge of exposure to a COVID-19 case, by District's Safety Coordinator and/or Director of Administrative and Fiscal Services. This notice will be provided to all employees (and their authorized representative), independent contractors and other employers at the worksite during the high-risk exposure period. These notifications will meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section 6409.6(a)(4); (a)(2); and (c) and be provided in a form readily understandable by employees and can be anticipated to be received by the employee.

System for Communicating to Students/Parents and Employees

Our goal is to ensure that we have effective two-way communication with employees, students and parents in a form they can readily understand, and that includes the following information, as per the appropriate group below:

Students/Parents

COVID-19 symptoms shall be reported to the school site. Health Services staff will contact the parent and provide information on symptoms being observed and provide further direction. Parent will complete the COVID-19 Reporting Form found on the school website at www.muesd.net. Parents will also report any cases of potential hazards.

Employees

COVID-19 symptoms shall be reported to the employee's immediate supervisor, or Safety Coordinator, or COVID-19 Safety Officer. The COVID-19 officer will contact the employee that reported having symptoms, to provide further direction. Staff will complete the COVID-19 Reporting Form found on the school website at www.muesd.net. In the case of potential hazards, the employee shall report any concerns to their immediate supervisor. The supervisor shall report the potential hazard to the Director of MOT.

- Employees can report symptoms, possible close contacts & hazards without fear of reprisal.

- Employees with medical or other conditions that put them at Risk of severe COVID-19 illness can request accommodations by contacting the Director of Administrative and Fiscal Services.

Employees may access COVID-19 testing at any time, as follows:

The District adheres to a strict policy on confidentiality when it comes to COVID-19 cases. Information on cases is kept confidential and only shared on a need-to-know basis and with only key personnel.

Training and Instruction for Employees, Students and Families

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect individuals from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which employees 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.
- 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, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
- The right of employees that are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
 - How to properly wear them.
 - How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 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. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - The conditions where face covering must be worn at the workplace.
 - That face coverings are additionally recommended outdoors for people who are not vaccinated if six feet distance cannot be maintained.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work/school if the individual has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing

and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

- Additional training provided to staff as needed includes: proper use of disinfectants and how to sanitize an area.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

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

- Ensuring that persons with a positive COVID-19 test are excluded from the workplace until our return-to-work requirements are met.
- Reviewing current CDPH guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.
- Developing, implementing, and maintaining effective policies to prevent transmission of COVID-19 by persons who had close contacts.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by providing employees with sick leave benefits as required by state and federal law. Employees will be afforded all appropriate leaves as prescribed by state and federal law.
- 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 and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the Imperial County Public Health Department.
- 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/school site to employees, authorized employee representatives, parents 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

We will meet the following return to work criteria for COVID-19 cases and employees excluded from work:

- **COVID-19 cases, regardless of vaccination status or previous infection and who do not develop symptoms or symptoms are resolving**, cannot return to work until we can demonstrate that all of the following criteria have been met:
 - 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;
 - At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever reducing medications; and

- 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.
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- **COVID-19 cases, regardless of vaccination status or previous infection, whose COVID19 symptoms are not resolving**, may not return to work until:
 - At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication; and
 - 10 days have passed from when the symptoms began.
- 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.
- The return to work requirements for COVID-19 cases who do or do not develop symptoms apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
- If an order to isolate, quarantine, or exclude 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.

Laura Dubbe, Superintendent

Date

Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Ventilation* (amount of fresh air and filtration maximized)			
Additional room air filtration			
Administrative			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and handsanitizing solutions being used according to manufacturer instructions			

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

** Identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.*

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

Date:

Name of person conducting the investigation:

Name of COVID-19 case (employee or non-employee*) and contact information:

Occupation (if non-employee*, why they were in the workplace):

** If we are made aware of a non-employee COVID-19 case in our workplace*

Names of employees/representatives involved in the investigation:

Date investigation was initiated:

Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed:

Date and time the COVID-19 case was last present and excluded from the workplace:

Date of the positive or negative test and/or diagnosis:

Date the case first had one or more COVID-19 symptoms, if any:

Information received regarding COVID-19 test results and onset of symptoms (attach documentation):

Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- The names of those found to be in close contact.
- Their vaccination status.
- When testing was offered, including the results and the names of those that were exempt from testing because.
 - They were fully vaccinated before the close contact and do not have symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.
- The names of those that were excluded per our Exclusion of COVID-19 Cases and Employees who had a Close Contact requirements.
- The names of those exempt from exclusion requirements because:
 - They were fully vaccinated before the close contact and did not develop COVID-19 symptoms.
 - They returned to work per our return-to-work criteria and have remained symptom free for 90 days or, for those that never developed symptoms, for 90 days after the initial positive test.

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:

1. All employees who were in close contact
2. Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) (2) and (c))

Names of employees that were notified:	Names of their authorized representatives:	Date

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Names of individuals that were notified:	Date

What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?

What could be done to reduce exposure to COVID-19?

Was local health department notified?

Date?

Appendix E: Documentation of Employee COVID-19 Vaccination Status - CONFIDENTIAL

Employee Name	Fully or Partially Vaccinated ¹	Method of Documentation ²

¹ Update, accordingly and maintain as confidential medical record

² Acceptable options include:

- Employees provide proof of vaccination (vaccine card, image of vaccine card or health care documents showing vaccination status) and employer maintains a copy.
- Employees provide proof of vaccination. The employer maintains a record of the employees who presented proof, but not the vaccine record itself.
- Employees self-attest to vaccination status and employer maintains a record of who self-attests.

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

- We provide COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:
 - Employees who were not present during the relevant 14-day period.
 - Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
 - COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.
- COVID-19 testing consists of the following:
 - All employees in our exposed group are immediately tested and then again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, 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 provide additional testing when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

COVID-19 investigation, review, and hazard correction

We 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 is documented and includes:

- 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 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 feasible.
 - Requiring respiratory protection in compliance with section 5144.

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, 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, if so, implement their use to the degree feasible.