

Camellia Waldorf School

COVID-19 Prevention Program (CPP)

COVID-19 Prevention Program (CPP) for Camellia Waldorf School

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

Date: February 1, 2021

Authority and Responsibility

Janna Nygren/Cindy Stinson have overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

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

- Assessing classroom set up and procedures to ensure protocols are being implemented in the safest way possible
- Reporting to the Acting School Director or Operations Manager any issues that may arise.
- Continuing to participate in any ongoing committee work regarding establishing and implementing COVID protocols originally assigned in June.

Employee screening

We screen our employees by:

- Clearly posting list of illness symptoms and policies at the entrance to the Front Office along with a no contact thermometer and hand sanitizer, and sharing this document digitally as well, including direction that employees should self-screen at home and also take their temperature before entering the building.

Correction of COVID-19 Hazards

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

The Operations Manager and School Director will be notified immediately if any hazards are identified. Severe hazards like lack of access to handwashing/sanitizing or PPE/masks, inability to physically distance, or exposure to known COVID risk will be addressed as quickly as possible with the intention to have the issue fully resolved within 1-2 business days of notification.

The Operations Manager or School Director are responsible for ensuring hazards are corrected, and may delegate tasks to individual employees including the Groundskeeper or faculty members as needed. All follow up to ensure corrections are complete will be done with a visual inspection by either the Operations Manager or School Director.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

- Classrooms are arranged so that teachers have ample room to maintain distance while teaching.
- Visitors to campus have been restricted. Parents may not enter the gated areas of campus without specific permission (happens very rarely) and screening. On campus volunteers have been cut back to a few necessary positions.
- Faculty meetings, parent meetings, and other large group meetings are done remotely.
- Student drop off times are staggered and multiple entrances have been assigned by grade level.
- Recess schedules are staggered and assigned by grade.
- Signs are posted throughout campus reinforcing the physical distancing requirements.
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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. Both cloth and disposable face masks, sized for both adults and children, are available in the Admin Office in the Redwood Building as well as in baskets on the front desk of each building. Employees are welcome to take some to keep in their work areas to provide to students/parents who need them. All employees are expected to direct any student, parent, or other visitor not wearing a mask to get one from the Front Office, and request support from administration in enforcing mask requirements as needed.

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and 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:

- Desk partitions have been purchased and are on hand in case classroom seating cannot support distancing.

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

- All classrooms have been moved outdoors and a vast majority of instruction takes place outdoors only.
- Professional HVAC technicians were hired to inspect the ventilation system and ensure that the maximum amount of outside air has been let into the system.
- In offices where employees must work indoors, windows are opened regularly and window fans are used when possible.
- Policies have been implemented outlining when students will move to Distance Learning due to poor air quality or weather conditions making outdoor learning unsafe.
- HVAC filters are changed regularly according to industry standards.

Cleaning and disinfecting

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

80% alcohol solution, Lysol, soap and water solution, and over the counter cleaning products have been purchased in bulk and are available to all employees as appropriate. Disinfection of high touch surfaces in common areas occurs at least twice daily.

Additional staff time has been built into work schedules to ensure ample time for sanitizing.

Each classroom has access to soap/water solution for daily cleaning as well as 80% alcohol solution for sanitizing.

Janitorial staff have been instructed to clean common use areas daily, including disinfecting high touch surfaces and restrooms.

Employees have access to COVID safety plans outlining cleaning procedures.

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

- Request our professionally contracted janitorial staff to perform a deep clean of exposed areas, including disinfecting all surfaces, door handles, faucets, etc.
- Any supplies or equipment in exposed areas will be individually disinfected or, when available, an electrostatic disinfecting system will be used to fog all exposed areas.

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:

A majority of employees are assigned to their own work area, so that most computers, phones, desks, etc. are not shared among employees.

In shared spaces like the copy room, disinfecting wipes or sprays are easily accessible and employees are instructed to disinfect after use.

Each classroom has a designated receptacle where students and employees can place shared items that require disinfecting, and staff have been assigned to disinfect all items at the end of each day.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Installed five new handwashing stations around campus so that each grade has easy access to soap and water.
- Installed touchless hand sanitizing dispensers at the entrance to each building and placed bottles of sanitizer in multiple central locations as well as in each classroom.
- Require all students, staff, and visitors to sanitize or wash hands before entering campus.
- Require each classroom participate in regular handwashing including before and after eating and when returning from any outdoor play/recess.

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.

A stock of masks, gloves, and gowns are available to all employees.

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:

Informed within 24 hours of our notification of exposure

Directed to seek testing at a free county facility, and given time to seek testing during work hours as needed

Excluded from the workplace and asked to quarantine as appropriate based on guidelines.

Information regarding benefits and protections for employees who have been excluded from the workplace due to COVID will be provided to all employees, and shared again individually at the time of exposure/exclusion.

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. Janna Nygren and Cindy Stinson are both readily available to receive information or concerns. Regular email communication regarding COVID protocols is initiated by Janna Nygren, including reminders about protocols and reporting. This information is also available in our COVID Safety Plan shared with employees and posted on our website. As a small organization, face to face communication is readily available.
- That employees can report symptoms and hazards without fear of reprisal. Concerns are taken seriously and addressed quickly.
- 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. Every two weeks reminder emails are sent to employees that include a link to free county testing sites and encouraging regular 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. Employees will be directed to seek testing at a free county testing site.
- 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 facecoverings.
- 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 offering employee sick leave.
- 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.
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Cindy Stinson, Acting School Director

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: Janna Nygren

Date: January 27, 2021

Name(s) of employee and authorized employee representative that participated: All employees invited to contribute.

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
Copy machine/computer use	Copy room, throughout the day	Small space, shared equipment available to all employees for occasional use throughout the day	Three doors allow for ventilation and access/exit routes. Employees have been instructed that only one person may use the area at a time. Alcohol wipes are readily available to clean equipment after use.
Front Desk A	Front lobby/reception area of Redwood Building, open during business hours	Employees come to ask questions, check employee mailboxes, find supplies, visitors check in. Space and surfaces are frequently used or touched by multiple employees	Hand sanitizer and masks visible and available, windows and doors open and fan turned on, visitors screened before entering, high touch surfaces sanitized at least twice a day, signs reminding all of distancing and mask requirements posted, students and parents are discouraged from entering unless absolutely necessary.
School Dismissal	In front of the Redwood Building/parking lot at 2:20 and 3:15 p.m.	Students and teachers from multiple classes enter the sidewalk area to await parents picking up	Parents asked to stay in cars until their child is dismissed, students and teachers are instructed to remain distanced, dismissal time is staggered to reduce number of students gathered and avoid cohort mixing,

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
Hallways	Various throughout the day	Narrow halls where distancing is harder	Classes moved outdoors so students are not using hallways to move between classes, bathroom schedules staggered so only one cohort is inside at a time, tape marks on the floors to indicate distancing outside bathrooms and arrows to indicate direction of traffic flow
Classrooms	Various, daily	Indoor space where in the past large groups of students gathered for class	Moved to all outdoor learning, in an emergency that requires students to move inside, windows and doors are opened, space set aside at front of room to ensure teacher has room to teach while staying distant, all rooms measured and safe occupancy calculated
Recess	Pines playground, basketball court, EC yard	Play areas shared by large groups of children	Recess schedule staggered so only one cohort uses at any given time, games altered to support distancing, equipment sanitized between uses
Bathrooms	Redwood and River Buildings	Frequently used areas shared by multiple employees	Adult restrooms are single occupancy, student restrooms use (multi stall bathrooms) staggered and limited to 2 or 3 students, all restrooms sanitized daily
Drinking Fountains	Redwood and River Building hallways, Redwood Building exterior	Drinking fountains require push button for use and mouth near fountain	All push button fountains have been closed and signs posted, only water bottle filling stations available

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			
Barriers/partitions (not currently in use)			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Outdoor classroom tents/walls			
Administrative			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection (if needed)			

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:

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

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):

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:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
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:	

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

Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.

- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2

Major COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.

