COVID-19 Prevention Program (CPP) for Novato Charter School

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

Date last updated: January 28, 2021

Authority and Responsibility

Kenya Williams and Nikki Lloyd have 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:

- 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:

Employees are encouraged to participate in the identification and evaluation of the COVID-19 hazards by contacting NCS Administration (Director or Operations Manager) through email, in person or at Faculty Meetings.

Employee screening

Each employee is expected to complete a daily health screening at home or before entering the campus. The electronic health screening involves Covid-19 health related questions and any known exposures.

This questionnaire and QR code was created by and is monitored by the NUSD technology department and NCS Operations Manager.

Employees are asked to respond to the statements below:

- I have NOT had any Covid-19 symptoms in the last 24 hours
- I have NOT been in contact with anyone displaying COVID-19 symptoms.

If an “AGREE” answer is give to the statement above, the employee is clear to work,
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:

If a hazard is reported by an employee to the school health liaisons, the hazard is investigated as soon as possible using the guidance of the MCOE and Marin County COVID-19 Schools Response Team and Reopening Schools team.

Depending on the correction actions needed to take place the appropriate personnel is contacted to rectify the hazard. A call for action may be made to:

- Our Operations Manager
- Our custodial staff
- The authorizing district personnel as responsible for the site.
- An outside vendor
- Our Tiger Team parents
- The Reentry Task Force committee

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:

- Reducing the number of people in an area at one time, employees have been reallocated to office spaces
- Using 6 ft spacing markers on the field and on the campus grounds
- Using directional arrow to indicate how persons should move across campus
- In classrooms student and teacher desks have been spaced 6 ft apart
- Common spaces such as restrooms and copy rooms are only used individually one at a time.

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. 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: **Plexiglass partitions have been installed for situations where at least six feet between individuals can be maintained. Each desk has access to a partition to use as needed.**

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:
- Keeping all doors open while rooms are in use to optimize ventilation
- Keeping all windows open while rooms are in use to optimize ventilation
- Operating the HVAC system continually
- Filters in HVAC systems are washed on a bi-monthly basis
- Each space is equipped with HEPA ventilation system
- Outdoor classrooms and eating areas have been identified for all grade levels

The cleaning schedule has been increased with specific attention to high touch areas. Once a week students are not on campus and spaces receive a deep cleaning between the two cohort days. All high touch areas, desks, and chairs are disinfected at the end of each school day. Equipment for large spaces has been supplied to the custodial staff.

**Cleaning and disinfecting**
We implement the following cleaning and disinfection measures for frequently touched surfaces:
Each classroom and office is equipped with cleaning supplies including disinfecting spray or wipes.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:
The classroom cohort will be closed for the required quarantine days. The classroom or space will be deep cleaned and disinfected by the custodial staff

**Shared tools, equipment and personal protective equipment (PPE)**
PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the use of supplies disinfecting spray or wipes.

**Hand sanitizing**
In order to implement effective hand sanitizing procedures, we:
- Evaluate handwashing facilities
- Determine the need for additional facilities.
- Encourage and allow time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time

**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.
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:

- Offered COVID-19 testing at no cost during their working hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to Director - Nikki Lloyd or Operations Manager - Kenya Williams
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees can access COVID-19 testing on campus twice a month or use one of the many resources shared in our staff communications
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:
● Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
● Excluding employees with COVID-19 exposure from the workplace for 10 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.
● 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:
  o At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  o COVID-19 symptoms have improved.
  o 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.
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: Kenya Williams

<table>
<thead>
<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</th>
<th>Places and times</th>
<th>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</th>
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### Appendix B: COVID-19 Inspections

**Date:**

**Name of person conducting the inspection:**

**Work location evaluated:**

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<td>Barriers/partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<td>Additional room air filtration</td>
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<tr>
<td><strong>Administrative</strong></td>
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<tr>
<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<td>Hand washing facilities (adequate numbers and supplies)</td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<td><strong>PPE (not shared, available and being worn)</strong></td>
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<tr>
<td>Face coverings (cleaned sufficiently often)</td>
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<tr>
<td>Gloves</td>
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<td>Face shields/goggles</td>
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<td>Respiratory protection</td>
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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:

<table>
<thead>
<tr>
<th>Employee (or non-employee*) name:</th>
<th>Occupation (if non-employee, why they were in the workplace):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location where employee worked (or non-employee was present in the workplace):</td>
<td>Date investigation was initiated:</td>
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<tr>
<td>Was COVID-19 test offered?</td>
<td>Name(s) of staff involved in the investigation:</td>
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<td>Date and time the COVID-19 case was last present in the workplace:</td>
<td>Date of the positive or negative test and/or diagnosis:</td>
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<td>Date the case first had one or more COVID-19 symptoms:</td>
<td>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</td>
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<tr>
<td>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):</td>
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<tr>
<td>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:</td>
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<td><strong>All employees who may have had COVID-19 exposure and their authorized representatives.</strong></td>
<td><strong>Date:</strong></td>
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<td><strong>Names of employees that were notified:</strong></td>
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<td><strong>Independent contractors and other employers present at the workplace during the high-risk exposure period.</strong></td>
<td><strong>Date:</strong></td>
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<td><strong>Names of individuals that were notified:</strong></td>
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<tr>
<td><strong>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</strong></td>
<td><strong>What could be done to reduce exposure to COVID-19?</strong></td>
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<tr>
<td><strong>Was local health department notified?</strong></td>
<td><strong>Date:</strong></td>
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*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:

<table>
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<tr>
<th>Employee Name</th>
<th>Signature</th>
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