

FEBRUARY 2021

# COVID-19 PREVENTION PROGRAM (CPP)

## GRIZZLY CHALLENGE CHARTER SCHOOL

All employers in California, including school districts, must establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). The CCP is not a replacement of the District's COVID-19 Guidelines, but a tool specifically for employee safety.

**FEBRUARY 10, 2021**

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# COVID-19 PREVENTION PROGRAM (CPP)

## GRIZZLY CHALLENGE CHARTER SCHOOL

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

### AUTHORITY AND RESPONSIBILITY

**Paul Piette, Director**, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

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

### IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We will implement the following in our workplace:

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

### EMPLOYEE PARTICIPATION

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

- Conduct frequent and periodic staff meetings to gain insights and information to ensure compliance with COVID-19 safety procedures.
- Conduct periodic anonymous staff surveys to gain insights and information to ensure compliance with COVID-19 safety procedures.

## EMPLOYEE SCREENING

We screen our employees by:

- All staff are required to self-screen at home to determine if they are symptom free.
- Teachers and staff will perform symptom checks using visual, audible, and temperature monitoring before students enter school buildings. Use of no-touch thermometers to administer temperature checks in the main office is conducted daily.
- All staff members check-in at the office once they arrive on campus. Each staff member gets their temperature taken with a non-contact thermometer. Once cleared, each staff member checks off a form under the correct date. All employees are masked and maintain proper distancing in the office.
- Students do symptom check and temperature checks before arriving to school under the supervision of the California National Guard.
- Any staff member or student who is symptomatic are directed to stay off campus until they get clearance from a medical professional or negative COVID-19 test.

## 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:

Identified hazards are reported to administrative personnel. The administrator evaluates the hazard and determines the method of mitigation. If onsite personnel are unable to resolve the hazard then an offsite contractor will be hired to do so. The hazard will be addressed and mitigated immediately.

## CONTROL OF COVID-19 HAZARDS

### Physical Distancing

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

Student Cohorts:

- Class sizes will range from 11-16 and will not comingle with other classes to ensure 6ft of distancing within the classroom.
- Classes will be comprised from specific platoons and only those platoons so that platoons do not comingle.

### Staff Distancing

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- Instructional Staff work from home when not teaching in person. Office and support staff work staggered schedules/remotely. Upon return to in person instruction instructional staff will teach in their classroom keeping 6 ft distance from students wherever practicable.
- Visitors and Guest Speakers are not allowed on campus except for maintenance and custodial staff.
- Individuals will keep as far apart as possible and 6 feet wherever practicable.

## Face Coverings

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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.

- 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.
- All students, staff, and visitors are required to wear facial coverings while on campus in accordance with the most recent CDPH guidelines and local Public Health guidance for schools. The only exemption to wearing face coverings is while eating.
- An ample supply of various types of approved face coverings from CDC including cloth, fiber, and plastic shields have been provided through the SLOCOE COVID PPE distribution.
- Face coverings will be enforced in the same manner in which other dress code expectations are enforced. Students will be counseled, required, and held accountable to the use of face coverings. Adults and students who fail to comply will be asked to leave campus.

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

- When an employee is alone in an enclosed 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 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. 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

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We implement the following measures for situations where we cannot maintain at least six feet between individuals:

- There are large, plexiglass partitions placed in the front office (between the receptionist and any staff, students, or visitors), as well as in Support Services, where Counseling/Special Education meetings are being met with individual staff members and students. Staff are advised to meet outdoors, online or in a larger space than their office where practicable.

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

- Classroom doors and windows will be open to best maximize air circulation
- Economizers on HVACs will be opened to a maximum allowing the highest quantity of air circulation in a building or classroom
- All HVAC systems are inspected by SLOCOE and maintained through Camp San Luis Obispo. Inspection reports are relayed from SLOCOE to the POST DPW.

- The highest MREV rating filter available will be used.
- Classroom line up and formation are done in front of the classrooms spaced more than 15 feet apart from each platoon to provide maximum space between cohort groups

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

- Sanitation and site disinfection will be administered every day. Frequently touched surfaces such as: door handles, light switches, sink handles, bathroom surfaces, tables, student desks, and chairs will be sanitized frequently throughout the day.
- Disinfecting products are those approved for use against COVID-19 on the Environmental Protection Agency (EPA)- approved list “N” and follow product instructions.
- In the instance of a confirmed case by a student or staff member, the classroom/building will be closed and a deep cleaning/disinfecting will be done. Additional areas of the campus may also require cleaning if the student/staff used that building.
- Shared use of materials and equipment are minimized. All students and staff have their own appropriate materials.
- All staff and students will be instructed in proper techniques for hygiene and hand washing.

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

#### **Electronic/Computer Devices**

- Each student is assigned a personal computer device that may not be shared with other students but when new devices are swapped out they are sanitized prior.

#### **School Supplies**

- Each student will have a personal supply of learning tools including books and manipulatives. These supplies may be brought back and forth between school and the barracks if necessary. They may not be shared with other students. Teachers will have extra supplies available in the classroom.
- Any supplies that must be shared such as manipulatives, materials, and equipment will be confined to groups within cohorts and sanitized between use.
- Each student is assigned personal books and when swapped out, are sanitized.

#### **Shared Tools, Equipment and Personal Protective Equipment (PPE)**

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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 cleaned between uses using soap and water. appropriate cleanser, or detergent without disinfection agents, according to product directions. Hand washings or hand sanitation should be conducted prior to use and following use.

- Discourage sharing of items, especially those that are difficult to clean or disinfect.
- Keep each student's and staff's belongings separated from others' and in individually labeled backpacks, desks, or areas.
- Ensure adequate supplies to minimize sharing of high-touch materials to the extent possible (e.g., assigning each student their own art supplies, equipment) or limit use of supplies and

equipment by one group of students at a time. Clean frequently with soap and water or with detergent without disinfection agents between use.

- Avoid sharing electronic devices.
- Avoid having students pass papers; utilize an in-box as they leave and enter.
- Keep classroom doors open when possible to minimize door handle usage.
- Do not share personal items.
- Ensure hand hygiene (hand washing or hand sanitization) prior to use of shared items and following use of shared items.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

## Hand Sanitizing

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In order to implement effective hand sanitizing procedures, we:

- Train all staff and students on proper hand washing procedures.
- Ensure hand washing stations available in all classrooms and office buildings.
- 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

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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:

- If a staff member or student shows symptoms of COVID-19, then we adhere to the Public Health Department's Pathway 1 Guidelines (<https://tinyurl.com/y6dy9pt5>), which includes directing the staff or student to seek medical evaluation or COVID-19 test.
- If a staff member or student comes into close contact of a person(s) with symptoms of COVID-19, then we adhere to the Public Health Department's Pathway 2 Guidelines (<https://tinyurl.com/yxfw6ctq>), which includes allowing the staff or student to attend school and participate in daily screening for symptoms or exposure. The staff or student is encouraged to get a COVID-19 test and if they develop symptoms of COVID-19 then they follow Pathway 1 Guidelines. If the staff or student tests positive for COVID-19, then we adhere to the Pathway 3 Guidelines listed below.
- If a staff member or student comes in contact with lab-confirmed COVID-19, then we adhere to the Public Health Department's Pathway 3 Guidelines (<https://tinyurl.com/y5kmh9js>), which includes instructing them to stay home and if they are at school, then we send them home. The staff or student is instructed to seek COVID-19 testing and to stay home from all activities for at least 14 days since the last contact with the person who tested positive or since the last day of their isolation period (up to 24 days).

## 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 need to report any symptoms to the Administrative/Office Staff via phone call, text, or email as soon as possible. The Administrative Staff will then communicate with the employee and conduct the investigation. The Administrative Team will then work with the employee and give further instructions.

- Employees can report symptoms and hazards without fear of reprisal.
- There are procedures or policies for employees to request accommodations for medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Surveillance testing will be required from all school staff every two months. The school will monitor testing every two months by expecting at least 25% of staff be tested every two weeks. These screening tests are made available free of charge to all staff members through Self Insured Schools of California (SISC) and our County Public Health Department. Frequency may change depending on local epidemiological data.
- All records of surveillance testing will be kept by administration and maintained as confidential records unless requested by the County Public Health Department.
- In addition, there are free pop testing sites around the county. All staff members have been provided the information if they would like to get tested there.
- 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.
- Frequent informational updates are supplied to all staff members concerning all mitigation efforts and upgrades and when additional COVID-19 hazards become known by administration.

## TRAINING AND INSTRUCTION

We will provide effective training and instruction that includes:

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



- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

[Appendix D: COVID-19 Training Roster](#) will be used to document this training.

## EXCLUSION OF COVID-19 CASES

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

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

**Date: 2/10/2021**



**APPENDIX B: COVID-19 INSPECTIONS**

**Date:**

**Name of person conducting the inspection:**

**Work location evaluated:**

<b>Exposure Controls</b>	<b>Status</b>	<b>Person Assigned to Correct</b>	<b>Date Corrected</b>
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
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			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

**APPENDIX C: INVESTIGATING COVID-19 CASES**

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

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

**Date:**

**Name of person conducting the investigation:**

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

**Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):**

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

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

**APPENDIX D: COVID-19 TRAINING ROSTER**

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**Date:**

**Person that conducted the training:**

Employee Name	Signature