



Bellevue Union School District

COVID-19 Prevention Program (CPP)

Requirements:

With some exceptions, all employers and places of employment are required to 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 Bellevue Union School District has used the model developed by Cal/OSHA to create our own unique CPP tailored to our workplace.

Cal/OSHA encourages employers to engage with employees in the design, implementation, and evolution of their COVID-19 Prevention Program. The original version of this plan was board approved on This plan is pending Board approval September 14, 2021 or by special board meeting.

Districts, as other employers, are required to comply with the following:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - 3205, COVID-19 Prevention
 - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - 3205.2, Major COVID-19 Outbreaks
 - 3205.3, Prevention in Employer-Provided Housing
 - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
 - The Additional Considerations provided at the end of this program, if applicable.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



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COVID-19 Prevention Program (CPP)

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

Last Reviewed and Revised: September 6, 2021

Board Approved: pending

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.
- 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 or their representatives will notify a supervisor immediately in writing should they notice or become aware of any potential hazard related to the spread of COVID-19.

Employee screening

As a preventative measure our BUSD sites are implementing a screening protocol as recommended by the California Department of Public Health (CDPH) .

Employees will self-screen prior to reporting to work according to the CDPH guidelines. Employees are advised to stay home should they have symptoms consistent with COVID-19. All itinerant staff and vendors complete a health screening questionnaire <http://bit.ly/busdcovid>. If Individuals are symptomatic in any areas and/or the answer is YES to any of these questions, the person cannot proceed to any BUSD campus and is encouraged to self-quarantine and seek medical counsel.

Employees will ensure that face coverings are worn in accordance with CDPH and local public health guidelines as it pertains to K-12 schools.

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:

Any employee may report, in writing, any unsafe condition in the working environment, or work issue related to COVID-19 to the immediate supervisor. The supervisor shall, within two (2) working days, respond in writing to the employee, with simultaneous copy to the Union Representative, if applicable, stating what has been done to make the condition safe or, if no action will be taken, the reason(s) why.

All employees shall have the right, without retaliation, to notify their supervisor in writing of alleged unsafe working conditions referring to the "COVID-19 BUSD Employee Expectations" or California Department of Public Health school guidance, and the Coronavirus Prevention Plan to request modified conditions to ensure the completion of the original work assignment. The Supervisor will address the complaint in a timely manner and remedy the potential unsafe working condition.

Concerns regarding lack of adherence to public health guidelines by District staff; parents; volunteers, students or members of the public should be directed to the Employee's direct Supervisor or Human Resources whenever appropriate.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors or in vehicles, and where required by orders from the California Department of Public Health (CDPH) or local health department.

The District will follow current state and county guidelines regarding the use of face coverings. Employees are encouraged to supply their own masks, however, the District will have disposable face-coverings available if needed.

In limited situations where a face covering cannot be used for pedagogical or developmental reasons (e.g., communicating or assisting young children or those with special needs) a face shield with a drape (per CDPH

guidelines) can be used instead of a face covering while in the classroom as long as the wearer maintains physical distance from others. Staff must return to wearing a mask covering once the activity is finished. In the event of a medical exemption, other masking options may be considered by the district for the individual student.

Face-covering may be removed during breaks, designated times and in designated areas. Face coverings will not be required while students and staff are actively engaged in eating or drinking. Training will be provided for students and staff in the proper use and etiquette of all face coverings. BUSD will continue to monitor and update requirements for face coverings based on guidance from the County Department of Public Health.

An Employee will notify their Supervisor if another Employee is not following the protocols associated with face coverings and does not respond to the first Employee's request to don the face covering.

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

- When an employee is alone in a room or a vehicle
- 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 feasible.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering or allowed non-restrictive alternative, will be at least six feet apart from all other persons unless the unmasked employee is either fully vaccinated or tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering 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 that requests one, regardless of their vaccination status.

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:

Ventilation systems have been checked to be in working order and will be monitored for proper operation. BUSD will continue to replace all Heating, Ventilation & Air Conditioning (HVAC) filters on the regular replacement cycle. Replacement cycles will be adjusted accordingly based on guidance or need. In addition to

HVAC, best practices for classroom and office ventilation are to have windows and doors open to allow air flow to provide as much fresh air as possible.

HEPA air purifiers were purchased and distributed throughout the district in offices, classrooms, and common areas.

Doors and windows may be closed in the event that the amount of outside air needs to be minimized due to other hazards, such as wildfire smoke or when the EPA Air Quality Index is greater than 100 or any pollutant. HVAC systems and HEPA air purifiers will continue to provide ventilation and filtration.

Cleaning and Disinfecting

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

Custodial staff at BUSD Schools have been thoroughly trained in the proper cleaning of frequently touched surfaces (e.g. playground equipment, door handles, desks, sink handles, drinking fountains) within the school. Routine cleaning will occur once per day. If a work area has had a sick person with COVID-19 within the last 24 hours, spaces occupied by that person will be cleaned and disinfected. Cleaning supplies will continue to be stored away from children. Outdoor playgrounds/natural play areas require routine cleaning and disinfecting. Staff engaged in cleaning and disinfecting will be equipped with proper PPE for COVID-19 disinfection in addition to PPE as required by product instructions. Outdoor activities, including instruction, will be encouraged.

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

The District will follow the current guidelines provided by OSHA, the CDPH and the local public health agency. The District will follow the CDC [“CoronaVirus Disease 2020 \(COVID-19\): Cleaning and Disinfecting your Facility”](#) A specific cleaning plan will be determined based on the exposed areas and the specific situation. Employees and their Representative will be notified of the clearing plan per Labor Code requirement.

Hand sanitizing

In order to implement effective hand sanitizing procedures:

All employees will participate in a health and safety training provided by the School Nurse and/or a provided online training module. Demonstrations will be used to teach and reinforce handwashing with soap and water for at least 20 seconds. In addition to soap and water, hand sanitizer will be available in classrooms and offices. Hand sanitizer is provided by the District at the entry location at each site. Employees will sanitize their hands when entering campus. The District prohibits the use of hand sanitizers containing methanol.

Each site is equipped with multiple bathrooms that include soap and water. Signs are posted in each bathroom encouraging both staff and students to wash their hands for at least 20 seconds each time. Staff are sent periodic reminders to wash hands regularly and for at least 20 seconds.

Custodial Staff will routinely evaluate hand washing facilities to ensure adequate stock of hand washing supplies.

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.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 (c)(2).. We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

Testing of symptomatic employees

We make COVID-19 testing available at no cost to employees with COVID-19 symptoms who are not fully vaccinated, 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 is accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

Employees who had potential COVID-19 exposure in our workplace will be:

Employees will be provided the information regarding free testing sites as well as free testing on a district site. The District has on-site testing available to all employees on a weekly basis and in response to an exposure or outbreak. In addition, health care insurance provides testing as does the local public health agency. Employees may have testing appointments during work hours and will coordinate with their Supervisor.

Employees that had a close contact are offered COVID-19 testing at no cost during their working hours, excluding:

- Employees who were fully vaccinated before the close contact and do not have symptoms.
- COVID-19 cases who were allowed to return to work per our return-to-work criteria and have remained free of symptoms for 90 days after the initial onset of symptoms, or for cases who never developed symptoms, for 90 days after the first positive test.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to employees.

Written notice within 1 day of your knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. 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 must meet the requirements of T8CCR section 3205(c)(3)(B) and Labor Code section

6409.6(a)(4); (a)(2); and (c), and in a form readily understandable by employees and can be anticipated to be received by the employee.

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:
 - a. Please report a positive test to your direct supervisor
 - b. If you are symptomatic and have not been tested, please report to your direct supervisor
 - c. Supervisors will follow reporting guidelines to the Superintendent and the COVID-19 Coordinator
 - d. Report possible hazards in writing to your direct supervisor
- Employees can report symptoms, possible close contacts, 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.
- As non-medical essential workers, School Employees can access voluntary testing through their health plan, local pop up sites, and the free county COVID-19 testing sites. The District is also offering weekly on-site testing to all employees.
- 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. District may coordinate with County Public Health to expedite testing. District may also contract with an outside provider. Staff will be allowed time during work hours to access testing. Should an Outbreak or Major Outbreak occur, the District may contract with an outside provider to ensure testing as required by Labor Codes 3205.1 and 3205.2
- 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 will be communicated to Employees as situations arise.

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, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits (including mandated sick and vaccination leave) 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.

- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing, 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 conditions where face coverings must be worn at the workplace.
- That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of 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 if the employee 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.

Appendix D: COVID-19 Training Roster and/or video conferencing screen shots will be used to document this training.

Exclusion of COVID-19 Cases

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions:
 - Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
- For employees excluded from work, continuing, and maintaining employees' earnings, wages, seniority, and all other employees' rights and benefits. This will be accomplished by coordination with Human Resources to provide current information.
- 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.
- 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 or tracking forms via a software program or forms provided by the local public health agency to keep a record of and track all COVID-19 cases.

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** shall 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 once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met
- Persons who had a close contact may return to work as follows:
 - Persons who had a close contact but never developed any COVID-19 symptoms may return to work when 10 days have passed since the last known close contact.
 - Persons who had a close contact and developed any COVID-19 symptom cannot return to work until these requirements have been met, unless the following are true:
 - The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms; and
 - At least 10 days have passed since the last know close contact; and
 - The person has been symptom free for at least 24 hours, without using fever reducing medications.
- If an order to isolate, or quarantine, or exclude an employee is issued by a local or state health official, the employee shall not return to work until the period of isolation or quarantine is completed or the order is listed. If no period was specified, then the period shall be in accordance with the return to work periods.

David Alexander, Ed.D., Superintendent

Date

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:

Date:

Name(s) of employee and authorized employee representative that participated:

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

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			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

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:

All employees who were in close contact
 Their authorized representatives (If applicable, the notice required by Labor Code section 6409.6(a) 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 D: COVID-19 Training Roster

Date:

Person that conducted the training:

Employee Name	Signature