



# 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. Due to the short timeline to post this plan to our website by February 1, 2021, it is our intention to further engage with employees in the further development and evolution of this plan. This plan is pending Board approval February 16, 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/](http://www.dir.ca.gov/dosh/coronavirus/)



# Bellevue Union School District

## COVID-19 Prevention Program (CPP)

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

**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

We screen our employees by:

As a preventative measure our BUSD sites are implementing a screening protocol as recommended by the Center of Disease Control (CDC).

All 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.

All employees will complete a temperature check when entering campus and complete the above mentioned questionnaire. Employees will maintain face coverings during temperature checks and temperature checks will be conducted with non-contact thermometers.

## 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 CDPH "COVID-19 Industry Guidance: Schools and School Based Programs" and 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 social distancing protocols by District staff; parents; volunteers, students or members of public should be directed to the Employee's direct Supervisor or Human Resources whenever appropriate.

## 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:

Nonessential visitors, volunteers, and community members will be asked not to come to a BUSD site unless a virtual option (e.g. video conferencing) is not available. Anyone entering a BUSD campus will be subject to the same precautionary measures including a temperature

check and COVID-19 symptom check protocol as outlined above. Attendance at staff meetings, IEPs, back to school nights, parent/teacher conferences, 504 meetings, and SST meetings may be held remotely, if possible. Bellevue Union School District will ensure that technology is available for students/parents to participate in remote meetings.

Signs that promote protective measures and physical distancing will be posted in visible locations throughout the District.

Seating at tables or desks is spaced according to current county and state guidelines. The recommended 6ft distance is relevant to the distance between people; portions of desks or tables may be within the recommended 6ft distance between people.

Layouts and social distancing include positioning staff work areas so that they are a safe distance away from high traffic areas. This may include the need for moving desks, rerouting traffic, or installation of plexiglass or other types of dividers. For all positions that perform one-on-one legally required student assessment (e.g. school psychologists, speech, nurses, educational specialist teachers, and any other BUSD staff), safety protocols will be followed for all testing and services.

Common or shared spaces such as cafeterias, playgrounds, and staff room will operate with staggered schedules that are determined by the site administrators. The schedules will promote social distancing guidelines to ensure staff and student safety while in these areas.

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 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.

Staff will be provided with the option of a district purchased face shield. Shields should be used by all who are engaged in instructional activities, tasks where the ability to see one's facial expression or lip movements is necessary or when there is an issue of personal safety. (e.g. DHH students/teachers or anyone who is incapacitated and is unable to remove their face covering without assistance). Plexiglass barriers will be provided for main office areas and district office locations.

Face-covering may be removed during breaks during designated times and in designated areas. Face coverings will not be required while students and staff are actively engaged in eating or drinking. Recommended social distancing guidelines will be followed during these times. 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.
- 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.

## **Engineering controls**

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

- a. For staff engaged in symptom screening-
  - i. Physical barriers (such as a plexi or plastic partition), surgical masks, face shields, disposable gloves and no-touch thermal scan thermometers.
- b. For front office and food service-
  - i. Physical barriers in the front office or food service point of sale (such as plexi or plastic partition), and areas where unit members are required to interact with the public, face coverings and disposable gloves.
- d. For Instructional Assistants, other special services and technical Employees-
  - i. Face coverings, shields, disposable gloves, plexi or plastic partitions will be provided as needed.

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

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

## **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. Schedules are implemented to provide for increased cleaning and disinfecting throughout the day. 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 and the CDC. 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.

### **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 employee who used it. Employees will use the District approved disinfectant and cleaner.

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

### **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 when the physical distancing requirements are not feasible or maintained.

## **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:

Employees will be provided the information regarding free testing sites. In addition, health care insurance provides testing. Employees may have testing appointments during work hours and will coordinate with their Supervisor.

## **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:
    - 1) Please report a positive test to your direct supervisor
    - 2) If you are symptomatic and have not been tested, please report to your direct supervisor
    - 3) Supervisors will follow reporting guidelines to the Superintendent and the COVID-19 Coordinator
    - 4) Report possible hazards in writing to your direct supervisor
  - 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.
  - Where testing is not required, how employees can access COVID-19 testing
- 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.
- 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 will 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 employees 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.
- 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** 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 in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until the return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for the recommended 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 coordinating with his/her immediate supervisor or Human Resources to determine leave 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.

---

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

### 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:**

<p><b>Employee (or non-employee*) name:</b></p>		<p><b>Occupation (if non-employee, why they were in the workplace):</b></p>	
<p><b>Location where employee worked (or non-employee was present in the workplace):</b></p>		<p><b>Date investigation was initiated:</b></p>	
<p><b>Was COVID-19 test offered?</b></p>		<p><b>Name(s) of staff involved in the investigation:</b></p>	
<p><b>Date and time the COVID-19 case was last present in the workplace:</b></p>		<p><b>Date of the positive or negative test and/or diagnosis:</b></p>	

<p><b>Date the case first had one or more COVID-19 symptoms:</b></p>		<p><b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b></p>	
<p><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></p>			

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

	<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

Date:

Person that conducted the training:

Employee Name	Signature