

Model COVID-19 Prevention Program (CPP)

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)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- 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 four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.
- The additional guidance materials available at www.dir.ca.gov/dosh/coronavirus/



January 2021

COVID-19 Prevention Program (CPP) for Pittsburg Unified School District

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

Date: 01/01/2021

Authority and Responsibility

The Supervisor for Site Safety, under the direction the Assistant Superintendent of Human Resources, 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: attending COVID-19 training, engaging in ongoing and exposure communication, participating in contact tracing and health screening, following COVID-19 policies, procedures and posted signage, exercising good personal hygiene and maintaining a sanitized workstation, reporting safety or hygiene hazards, and enforcing COVID-19 policies and procedures (this includes but is not limited to educating and informing, wearing a face covering, physical distancing, contact tracing and health screenings, isolating, reporting of exposures, staggered arrival/departure times, etc.).

Employee screening

We screen our employees by: sending out a Daily Self-Screening check in accordance with California Department of Health and Contra Costa County Health Guidelines.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B:**

COVID-19 Inspections form, and corrected in a timely manner based on the severity of the hazards, as follows:

- The severity of the hazard will be assessed and correction time frames assigned, accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

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:

- Eliminating the need for workers to be in the workplace – remote work arrangements when possible.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures.

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) and Contra Costa Health Services (CCHS). Face Coverings and appropriate PPE will be provided to all staff. Employees can request additional needs of PPE from their direct supervisor. Face coverings will be required at all times and those who are not compliant shall be excluded from the worksite. At all times, employees must maintain appropriate physical distance.

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 by contact Human Resources.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart determined by 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

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

- Provide/install solid plastic partitions where necessary
- Providing necessary PPE's
- Maintain hand sanitizer in all rooms.

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

- Ensuring that windows that can open are operational and easy to operate as originally installed and designed
- Mechanical systems are adjusted/programmed to allow maximum outside air when permissible
- Building Automated Systems are in place to adjust outside air intake to minimal positions when weather and or air quality is below standards where applicable.
- HVAC Operating systems are serviced within industry standards, manufacturer's recommendations and align with State, County Health guidelines
- HVAC system services consistently maintained
- Filter grade will be the highest level per manufacturer's recommendations.
- Self contained air purifiers will be provided in portable classrooms
- Any HVAC Contract Service Agreements, if needed, reflects all items above

Cleaning and disinfecting

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

Classrooms and staff work areas are stocked with sufficient approved cleaning and disinfecting supplies to sanitize surfaces and high touch areas throughout the day. Whenever possible, windows and interior doors to classrooms and offices will be open for air circulation. Custodial staff will have proper training and will clean and disinfect the common surfaces and objects used throughout the day such as office workspaces, break rooms, restrooms, and other shared spaces that were in use throughout the day.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: Our District custodial staff will be dispatched to clean and disinfected all affected areas at any given site. Human Resources will contact the Director of Maintenance, Operations, and Transportation with this request.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, face coverings, 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 providing employees training and appropriate equipment to clean and disinfect shared areas, tools and equipment.

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, we:

- Evaluating hand washing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibiting 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.

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:

- Notified by Human Resources within 24 hours of exposure.
- 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:

- In the event that an employee should experience any COVID-19 symptoms, they should contact Human Resources immediately. Contact can be made by emailing Human Resources or over telephone. Human Resources will determine the next steps for the employee.
- All employees can report symptoms and hazards without fear of reprisal. **All reports are considered confidential.**
- Employees who believe they have increased risk of severe COVID-19 illness can contact Human Resources for next steps and if any accommodations are needed.
- Employees will be offered a COVID-19 test onsite through Curative Inc. monthly. An employee can also seek free COVID-19 testing through Contra Costa Health Services (CCHS) or their own health provider.
- 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 next steps after receiving a positive test result.
- The District continues to assess all COVID-19 hazards to employees and will continue to update 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 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continue employee's rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by providing employer paid sick leave via worker's compensation benefits should the employee test positive after exposure. Contract based leave options and any additional leave time provided through CFRA/FMLA will be used, if applicable.
- 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.
- Maintain all COVID-19 records for a minimum of 5 years unless otherwise noted.

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 14 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 14 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 14 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Assistant Superintendent of Human Resources



Evelyn Tamondong-Bradley

Appendix B: COVID-19 Inspections

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

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

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.

Human Resources Contact Tracer Name: _____

Ext. Number: _____

Case Reported Date: _____



Symptomatic cases: Identify contacts from 2 days before symptom onset and up to 14 days after their symptom onset at site. Asymptomatic cases: Identify contacts from 2 days before through 14 days after the sample was taken that led to confirmation of positive COVID-19 infection at site.

Determine symptom onset and infectious period for case. Stress importance of identifying all contacts 2 days before and 14 days after symptom onset while at site.

Emp ID: _____ Name: _____ Position: _____ Site: _____ Room Number/Site Location: _____

Last day physically at work: _____ Did emp. report to work with symptoms? Yes No

Onset of Symptoms Date: _____ Does employee currently have symptoms? Yes No

Exposure Date: _____ Work Site Exposure: Yes No Did employee sign-in at site/s: Yes No

Describe Direct Exposure: _____

Test Date: _____ Result Received Date: _____ Results: Positive Negative Household Members Symptomatic: Yes No

Quarantine Start Date: _____ Quarantine End Date: _____ Return to Work Date: _____

Remote Work Assignment: Yes No Administrator Notification Date: _____

Notes: _____

Have employee explain their day and exposure to other site employees, where did they go when on site. Have them be as specific as possible.

List names of contacts on last physical day at work: _____ Did employee work 48-hours prior: Yes No

Name: _____ Mask/6ft Yes No Did emp. work/visit other sites during the last 48-hours: Yes No

Was interaction more than 15-minutes? Yes No Site: _____ Sign-in sheet req'd from site/s Yes No

Name: _____ Mask/6ft Yes No Site: _____ Sign-in sheet req'd from site/s Yes No

Was interaction more than 15-minutes? Yes No Site: _____ Sign-in sheet req'd from site/s Yes No

Name: _____ Mask/6ft Yes No Site: _____ Sign-in sheet req'd from site/s Yes No

Was interaction more than 15-minutes? Yes No Site: _____ Sign-in sheet req'd from site/s Yes No

Note: If employee has worked while symptomatic, capture contacts 48-hours from 1st date of symptom onset, and through the last physical day at work site/s.

Direct Contact Additional Notes (ensure to capture cumulative time for each contact):

How much time did they spend with each contact? _____ Notes: _____

Did employee visit different departments at the site? If so, what departments? Who was in the room? Yes No Who was there: _____

Did employee visit breakroom, were there other employees present, was anyone eating? Yes No Did employee use the restroom, if so which location? _____

If in breakroom was everyone wearing a mask? Yes No Did employee use the restroom, if so which location? _____

Additional Note: _____

Appendix D: COVID-19 Training Roster

Date: **[enter date]**

Person that conducted the training: **[enter name(s)]**

Employee Name	Signature

Multiple COVID-19 Infections and COVID-19 Outbreaks

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

COVID-19 testing

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

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

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

- Increasing physical distancing as much as possible.
- Respiratory protection.

Notifications to the local health department

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