

## **CSP Injury and Illness Prevention Plan: COVID-19 Addendum for OCS-South**

*Approved by the Odyssey Charter School Governing Board on March 3, 2021*

California employers are required to establish and implement an Injury and Illness Prevention Program (IIPP) to protect employees from all worksite hazards, including infectious diseases.

The School has adopted this addendum to accommodate reopening school for in-person instruction in accordance with COVID-19 and Reopening In-Person Instruction Framework & Public Health Guidance for K-12 Schools in California, 2020-2021 School Year from the California Department of Public Health (CDPH). This document additionally complies with the temporary Cal/OSHA regulations issued November 30, 2020 which require a “written COVID-19 prevention plan.” Resumption of in-person instruction presumes that the School has complied with all applicable legal authority and public health guidance, including pursuant to the California Blueprint for a Safer Economy program and California Safe Schools for All plan. School and worksite administrators should coordinate with state and local health officials to obtain timely and accurate information about the level of disease transmission in the local community before resuming any on-site work practices. Local conditions will influence the decisions that public health officials make regarding community-level strategies.

This addendum contains three (3) parts:

Part one (1) contains background information regarding COVID-19, including known symptoms, emergency warning signs and high-risk factors;

Part two (2) provides guidelines for implementation of a COVID-19 Infection Control Plan, which includes short-term measures to implement while COVID-19 remains endemic in states and communities;

Part three (3) contains measures to maintain a healthy workforce until herd immunity in the population is achieved or the global incidence of COVID-19 comes under control.

### **Background**

In November 2019, a novel coronavirus (SARS-CoV-2) was discovered in Wuhan, China, which was found to cause a viral respiratory illness (coronavirus disease 2019, or “COVID-19”) leading to severe injury and death in certain populations, particularly elderly persons and persons with underlying health conditions.

COVID-19 was declared a pandemic by the World Health Organization on March 11, 2020. In response to the COVID-19 Pandemic, public health officers in many states and counties ordered all individuals to stay home or at their place of residence (i.e., “Shelter in Place”), except as needed to maintain continuity of operations of certain critical infrastructure sectors. Across the nation, public schools and most other government offices and private businesses were closed in

order to slow the spread of the coronavirus in the community. Many states and localities have now commenced phased reopening.

In 2020, the CDC identified the following symptoms of COVID-19, which typically appear within 2-14 days after exposure to the virus:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Headache
- New loss of taste or smell
- Sore throat
- Fatigue
- Muscle or body ache
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

The CDC also recommends that, if a person shows any of the following emergency warning signs,\* he or she should seek emergency medical care immediately:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face

*\*Please note that this is not a complete list of all possible symptoms. Anyone experiencing any other symptoms that are severe or concerning should contact a medical provider.*

Certain people are at higher risk for severe illness from COVID-19, including:

- People 65 years and older
- People who live in a nursing home or long-term care facility
- People of all ages with underlying medical conditions, particularly if not well controlled
- People with chronic lung disease or moderate to severe asthma
- People who have serious heart conditions
- People who are immunocompromised (Many conditions can cause a person to be immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications)
- People with severe obesity (body mass index [BMI] of 40 or higher)
- People with diabetes
- People with chronic kidney disease undergoing dialysis
- People with liver disease

Decisions to resume operations should be based on both the level of disease transmission in the community and the capacity to protect the safety and health of staff and students at each

school site. By providing guidelines for the design of a control plan for COVID-19, part two of this addendum is intended to allow for the resumption of school by implementing measures to prevent and slow the spread of COVID-19 within the workplace.

### **COVID-19 Infection Control Plan**

Before resuming normal or phased school activities after a Shelter in Place order is lifted, prepare and implement a COVID-19 preparedness, response, control and prevention plan (i.e., COVID-19 Infection Control Plan). Federal, state, and local public health communications must be monitored to keep up with information available about COVID-19 regulations, guidance, and recommendations, to ensure that workers have access to the timeliest information.

#### **1. Design, implement, update and maintain a COVID-19 Infection Control Plan:**

The overall goal of the COVID-19 Control Plan is to decrease the spread of COVID-19 and lower the impact of the disease in the workplace. This includes the following objectives:

- Prevent and reduce transmission among employees;
- Maintain healthy school operations; and
- Maintain a healthy work environment.

All site administrators will implement and update as necessary a control plan that:

- Is specific to the School's workplace;
- Identifies all areas and job tasks with potential exposures to COVID-19; and
- Includes control measures in this policy to eliminate or reduce such exposures.

COVID-19 Infection Control Plans should consider that employees may be able to spread COVID-19 even if they do not show symptoms, which is a source of anxiety in the workforce, particularly among higher-risk individuals. Therefore, it is important to have discussions with workers about planned changes and seek their input. Additionally, collaboration with workers to effectively communicate important COVID-19 information.

#### **2. Adjust operations to slow the spread:**

- Employees who have COVID-19 symptoms should notify their supervisor and stay home.
- Sick employees should follow CDC-recommended steps for self-quarantine. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with their supervisor, local health departments and healthcare providers.
- Employees who appear to have symptoms upon arrival at work or who become sick during the day should immediately be separated from other employees, students, and visitors, and sent home.

- Adopt a procedure for the safe transport of an employee who becomes sick while at work. The employee may need to be transported home or to a healthcare provider.
- Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC-recommended precautions.
- If implementing in-person health checks, conduct them safely and respectfully. Protect the screener using social distancing, barrier or partition controls, or personal protective equipment (“PPE”). However, reliance on PPE alone is a less effective control and is more difficult to implement, given PPE shortages and training requirements.
- Complete the health checks in a way that helps maintain social distancing guidelines, such as providing multiple screening entries into the building. Further detailed information regarding the School’s screening procedures may be found in the COVID-19 Health and Safety Policy.
- Should any School employees screen positive while at home or on campus, employees must follow all policies and procedures regarding isolation, quarantine, and testing to prevent or reduce the possible transmission of COVID-19 in the workplace.
- Follow guidance from the Equal Employment Opportunity Commission regarding confidentiality of medical records from health checks.

To prevent stigma and discrimination in the workplace, make employee health screenings as private as possible. Do not make determinations of risk based on race, country of origin or any other protected characteristics, and be sure to maintain confidentiality of each individual’s medical status and history.

### **3. Conduct a Workplace Hazard Assessment:**

The purpose of a hazard assessment of the workplace is to identify where and how workers might be exposed to COVID-19 at work. Combinations of controls from the hierarchy of controls are used to limit the spread of COVID-19 (see Controls Table in Appendix A). These include engineering controls, workplace administrative policies, and personal protective equipment (PPE) to protect workers from the identified hazards.

- Conduct a thorough hazard assessment to determine if workplace hazards are present, or are likely to be present, and determine what type of controls are needed for specific job duties, including:
  - Evaluating potential workplace exposures which employees or other persons at the School campus may encounter.
  - Evaluating places where School employees or others may congregate on campus, such as hallways, bathrooms, and break rooms.
  - Reviewing and incorporating all applicable federal, state, and local public health guidance related to COVID-19, as well as any other industry-specific guidance.
  - From time to time, evaluate existing COVID-19 health and safety measures to determine whether additional or different measures are necessary.
  - Periodically conduct inspections to identify any potential COVID-19 unhealthy

conditions, work practices, procedures, and to ensure compliance with all COVID-19 health and safety measures.

- Encouraging employees to participate and assist the School in identifying and evaluating potential COVID-19 workplace hazards. The School will do so by:
  - When implementing this plan, the School will consult with employees and coordinate a virtual safety meeting on March 10, 2021. At the safety meeting, the School will discuss the components of the COVID-19 Prevention Plan with employees. The School will additionally seek input from employees regarding potential COVID-19 hazards. In advance of the virtual safety meeting, employees are encouraged to consider areas on campus which they believe pose a high-risk of COVID-19 transmission, as well as activities on campus that are difficult to complete while complying with all health and safety guidance.
  - The School will create a rotating team of employees to participate in hazard assessments on campus. These assessments will occur virtually to the greatest extent practicable. These assessments will occur MONTHLY. All employees are encouraged to volunteer for participation in hazard assessments, and the School will rotate teams of employees, ensuring all groups of School personnel are equally represented to the greatest extent possible.
  - If employees have specific COVID-19 hazard concerns, they may contact Rachelle Martinez, Director of Operations to discuss such concerns, who may be reached at 626-229-0993 or via email at rachellem@ocsmail.org.
- When engineering and administrative controls cannot be implemented or are not fully protective:
  - Determine what PPE is needed for each workers' specific job duties,
  - Select and provide appropriate PPE to the workers at no cost, and
  - Train their workers on its correct use.
- If the School's hazard assessment reveals any COVID-19 hazards, it will work immediately to correct any and all such hazards. Salvador Martinez, Lead Custodian will be responsible for correcting COVID-19 hazards.

#### **4. Take action if an employee is suspected or confirmed to have COVID-19 infection:**

##### **Current Cal/OSHA Regulations**

- Effective immediately, upon one (1) "COVID-19 case"<sup>1</sup> in the workplace, the School will:
  - Investigate the COVID-19 case, determine the day and time the COVID-19 case was last present on the School campus, the date of the positive test and/or diagnosis, and the date the case has one (1) or more COVID-19 symptoms, if any.
  - Investigate whether other School employees or any other third parties may have had a COVID-19 exposure by evaluating the activities of the COVID-19 case at the

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<sup>1</sup> Cal/OSHA regulations define a "COVID-19 case" as a person who: 1) Has a positive COVID-19 test, 2) is subject to a COVID-19 related order to isolate issued by a local health department or state health official, or 3) has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

School campus during the “high-risk exposure period”<sup>2</sup>.

- Give notice of potential exposure, within one (1) business day, and without revealing any personal identifying information<sup>3</sup> of the COVID-19 case, to:
  - 1) All employees and their authorized representatives, if any, who may have had COVID-19 exposure, and
  - 2) Independent contractors and other employers present at the workplace during the high-risk exposure period.
- Offer testing for COVID-19 to all employees with potential COVID-19 exposure in the workplace, at no charge and during working hours, as well as:
  - Information regarding COVID-19-related benefits under all applicable federal, state, and local laws, as well as potential salary continuation rights during any period of exclusion due to the COVID-19 exposure.
- Investigate the potential that workplace conditions contributed to the risk of COVID-19 exposure, as well as remedial steps that could have been taken to reduce the risk of COVID-19 exposure.
  
- Effective immediately, and pursuant to current Cal/OSHA regulations:
  - All employees with COVID-19 exposure shall be excluded from the School campus for fourteen (14) days from the last known exposure to a COVID-19 case.
  - School employees with confirmed COVID-19 must not return to the School campus as follows<sup>4</sup>:
    - For Employees who test positive and have symptoms consistent with COVID-19:
      - 1) At least twenty-four (24) hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications,
      - 2) COVID-19 symptoms have improved, and
      - 3) At least ten (10) days have passed since COVID-19 symptoms first appeared.
    - Employees who test positive but remain asymptomatic shall not return to the School campus until at least ten (10) days have passed since the date of specimen collection of their first positive COVID-19 test.
  - Employees excluded from work due to COVID-19 exposure may be entitled to salary continuation during the fourteen (14) day exclusion period. The School may elect to provide paid sick leave during this period. Any salary continuation benefits will account for funds received from public sources during this period, as well as any indemnity benefits as part of any workers’ compensation claim

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<sup>2</sup> “High-risk exposure period” is defined by Cal/OSHA as: 1) For individuals with COVID-19 symptoms, from two (2) days before the symptoms first develop until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or 2) for asymptomatic individuals who test positive for COVID-19, from two (2) days before until ten (10) days after the first positive COVID-19 test specimen was collected.

<sup>3</sup> All personally identifying information related to COVID-19 cases or those with COVID-19 symptoms shall be kept confidential. However certain information may be provided to public health authorities, as required by law.

<sup>4</sup> The School will not require a negative test prior to an employee returning to work. 8 CCR 3505(c)(11)(D).

related to the employee's COVID-19 exposure.

- If a COVID-19 case is not work-related pursuant to all applicable workers' compensation laws, School employees are not entitled to salary continuation during the fourteen (14) day exclusion period.
  - If a School employee is unable to work for reasons other than protecting other employees or students at the School campus from possible COVID-19 transmission, the employee is not entitled to salary continuation during the fourteen (14) day exclusion period.
- Effective immediately, and in the event of a confirmed COVID-19 case at the School campus, the School will notify the local public health department, as required by law.
  - Effective immediately, upon notice any COVID-19-related serious illnesses or death<sup>5</sup> of an employee occurring in a place of employment or in connection with any employment, the School will immediately report such information to Cal/OSHA.

#### **AB 685**

Effective January 1, 2021, employers are required to provide certain notices in response to a "notice of potential exposure to COVID-19," in accordance with Labor Code section 6409.6. A "notice of potential exposure" means any of the following:

- (a) Notification from a public health official or licensed medical provider that an employee was exposed to a qualifying individual at the worksite;
- (b) Notification from an employee, or their emergency contact, that the employee is a qualifying individual;
- (c) Notification through the School's testing protocol that the employee is a qualifying individual; or
- (d) Notification from a subcontracted employer that a qualifying individual was on the school site.

Upon receipt of a "notice of potential exposure," the School must take the following actions within one (1) business day of the notice:

- (a) Provide a written notice to all employees who were on the premises in the same worksite<sup>6</sup> as the qualifying individual<sup>7</sup> within the infectious period<sup>8</sup> that they may

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<sup>5</sup> Pursuant to 8 CCR §330(h), "Serious injury or illness means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement."

<sup>6</sup> The "worksites" does not include buildings, or floors within multistory buildings, that a qualifying individual did not enter. If the School operates multiple worksites, the School must only notify employees who worked at the same worksite as the qualified individual. (Labor Code § 6409.6, subd. (d)(5).)

<sup>7</sup> A "qualifying individual" means (a) a laboratory-confirmed case of COVID-19, as defined by the State Department of Public Health; (b) a positive COVID-19 diagnosis from a licensed health care provider; (c) a COVID-19-related order to isolate provided by a public health official; (d) died due to COVID-19, in the determination of a county public health department or per inclusion in the COVID-19 statistics of a county. (Labor Code § 6409.6, subd. (d)(4).)

- have been exposed to COVID-19.<sup>9</sup>
- (b) Provide a written notice to the exclusive representative, if any, of the above employees.<sup>10</sup>
  - (c) Provide all employees who may have been exposed and the exclusive representative, if any, with information regarding COVID-19-related benefits to which employees may be entitled under applicable federal, state, or local laws.
    - Information regarding COVID-19-related benefits includes, but is not limited to, workers' compensation, and options for exposed employees, including COVID-19-related leave, School sick leave, state-mandated leave, supplemental sick leave, or negotiated leave provisions, as well as antiretaliation and antidiscrimination protections applicable to employees.
  - (d) Notify all employees, and the employers of subcontracted employees and the exclusive representative, if any, on the disinfection and safety plan that the employer plans to implement and complete per the guidelines of the federal Centers for Disease Control.

Records of the above notices must be retained for a minimum of three (3) years.

Effective January 1, 2021 the School must also take the following responses in the event of a COVID-19 "outbreak," as defined by CDPH:

- Within forty-eight (48) hours, the Executive Director or designee shall notify the county public health department of the names, number, occupation, and worksite of employees who meet the definition of a qualifying individual.<sup>11</sup>
- The Executive Director or designee shall also report the address and NAICS code of the worksite where the qualifying individuals work.
- Additional notice will be provided of any subsequent laboratory-confirmed cases of COVID-19 at the worksite.

### **Other Relevant Public Health Guidance**

Specific guidelines for responding to suspected and confirmed cases of COVID-19 in schools are also found in the Reopening In-Person Instruction Framework & Public Health Guidance for K-

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<sup>8</sup> The "infectious period" means the time a COVID-19-positive individual is infectious, as defined by the State Department of Public Health. (Labor Code § 6409.6, subd. (d)(2).)

<sup>9</sup> Written notice must be provided in the same manner that the School ordinarily uses to communicate employment-related information. Written notice may include, but is not limited to, personal service, email, or text message if it can reasonably be anticipated to be received by the employee within one business day of sending and shall be in both English and the language understood by the majority of the employees.

<sup>10</sup> Written notice to the exclusive representative must contain the same information as required in an incident report in a Cal/OSHA Form 300 injury and illness log unless the information is inapplicable or unknown to the school. This requirement does not apply if the school's employees do not have an exclusive representative.

<sup>11</sup> A "qualifying individual" means (a) a laboratory-confirmed case of COVID-19, as defined by the State Department of Public Health; (b) a positive COVID-19 diagnosis from a licensed health care provider; (c) a COVID-19-related order to isolate provided by a public health official; (d) died due to COVID-19, in the determination of a county public health department or per inclusion in the COVID-19 statistics of a county. (Labor Code § 6409.6, subd. (d)(4).)



12 Schools in California, 2020-2021 School Year, released by the CDPH on January 21, 2021. In most cases, you do not need to shut down the facility. If it has been less than seven (7) days since the sick employee has been in the facility, close off any areas used for prolonged periods of time by the sick person:

- Wait twenty-four (24) hours before cleaning and disinfecting to minimize potential for other employees being exposed to respiratory droplets. If waiting twenty-four (24) hours is not feasible, wait as long as possible.
- During this waiting period, open outside doors and windows to increase air circulation in these areas.

If it has been seven (7) days or more since the sick employee used the facility, additional cleaning and disinfection is not necessary. Continue routinely cleaning and disinfecting all high-touch surfaces in the facility.

Follow the CDPH and CDC cleaning and disinfection recommendations:

- Clean dirty surfaces with soap and water before disinfecting them.
- To disinfect surfaces, use products that meet EPA criteria for use against SARS-Cov-2, the virus that causes COVID-19, and are appropriate for the surface.
- Always wear gloves and other PPE appropriate for the chemicals being used when you are cleaning and disinfecting.
- You may need to wear additional PPE depending on the setting and disinfectant product you are using. For each product you use, consult and follow the manufacturer's instructions for use.

Determine which employees may have been exposed to the virus and may need to take additional precautions:

- Inform employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA).
- Follow the Public Health Recommendations for Community-Related Exposure and instruct potentially exposed employees to stay home for fourteen (14) days, or such period as established by local health order, telework if possible, and self-monitor for symptoms.

## **Measures to Maintain Healthy Ongoing School Operations**

- 1. Identify a workplace coordinator.** The Site Administrator will be responsible for COVID-19 issues and their impact at the workplace.

**2. Protect employees at higher risk for severe illness through supportive policies and practices.** Older adults and people of any age who have serious underlying medical conditions are at higher risk for severe illness from COVID-19.

- Provide options to telework, if available and reasonable.
- Offer vulnerable workers duties that minimize their contact with students and other employees, if the worker agrees to this.
- Offer flexible options such as telework to employees where available and reasonable to eliminate the need for employees living in higher transmission areas to travel to workplaces in lower transmission areas and vice versa.

**3. Communicate supportive workplace policies clearly, frequently, and via multiple methods.** Employers may need to communicate with non-English speakers in their preferred languages.

- Train workers on how implementing any new policies to reduce the spread of COVID-19 may affect existing health and safety practices.
- Communicate to any contractors or on-site visitors about changes that have been made to help control the spread of COVID-19. Ensure that they have the information and capability to comply with those policies.
- Create and test communication systems that employees can use to self-report if they are sick and that you can use to notify employees of exposures and closures.
- Use a hotline or another method for employees to voice concerns anonymously. Rachele Martinez, Director of Operations is the point of contact for COVID-19 concerns. Consistent with the Employee Handbook and all applicable policies, the School will not tolerate discrimination, harassment, or retaliation against any employee who reports COVID-19 symptoms or hazards.

**4. Establish policies and practices for social distancing.** Where possible and reasonable, alter your workspace to help workers and students maintain social distancing and physically separate employees from each other and from students, such as:

- Implement flexible worksites (e.g., telework).
- Implement flexible work hours (e.g., rotate or stagger shifts to limit the number of employees in the workplace at the same time).
- Increase physical space between employees at the worksite by modifying the workspace.
- Increase physical space between employees and students (e.g., physical barriers such as partitions).
- Use signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.
- Implement flexible meeting and travel options (e.g., postpone non-essential meetings or events in accordance with state and local regulations and guidance).

- Close or limit access to common areas where employees are likely to congregate and interact.
- Prohibit handshaking.
- Deliver services remotely (e.g., phone, video, or web).
- Adjust School practices to reduce close contact with and among students — for example, by using larger formal spaces (e.g., auditoriums) or outdoor areas for instruction.
- When it is not possible to maintain a distance of at least six (6) feet, individuals shall be as far apart as possible.
  - In this situation, the School will evaluate the need for additional eye protection and respiratory protection, consistent with CCR Title 8, section 5144.

## 5. Facial Coverings

- Until lifted, the CDPH has ordered that all persons must wear a cloth face covering at work if the hazard assessment has determined that they do not require PPE (such as a respirator or medical facemask) for protection.
  - A cloth face covering contains the wearer’s respiratory droplets to help protect their co-workers and others.
  - Cloth face coverings are not considered PPE. They help prevent those who do not know they have the virus from spreading it to others, but do not offer the same level of protection for wearers from exposure to the virus that causes COVID-19 as PPE.
- Remind employees that CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain, especially in areas of significant community-based transmission. Wearing a cloth face covering, however, does not replace the need to practice social distancing.
- As necessary, the School will provide clean and undamaged face coverings.
- All face coverings must be worn, cleaned, and replaced as needed, and unless an applicable exception to wearing a facial covering applies, consistent with the School’s COVID-19 Health and Safety Policy.
- If an employee cannot wear a face covering, face shield with a drape, respiratory protection, or another effective alternative to a facial covering, the employee shall be kept at least six (6) feet apart from all other employees, students, and persons, unless the unmasked employee is tested at least twice per week for COVID-19. However, testing an employee twice per week is not an alternative to wearing a facial covering where otherwise required.

## 6. Engineering Controls

- To the maximum extent feasible, the School will implement all appropriate actions to protect employees where six (6) feet of physical distancing cannot be maintained, consistent with the COVID-19 Health and Safety Policy, as well as this Plan.

- To the maximum extent feasible, the School will ensure maximize the quantity of outside air in buildings or by natural ventilation systems, except when the United States EPA Air Quality Index is greater than one hundred (100) for any pollutant, or if opening windows or doors would cause additional hazards to employees.
- Conducting MONTHLY inspections of the HVAC system.
- To the extent feasible, the School will increase the filtration efficiency of its existing ventilations systems to the highest level that is safely allowable.

**7. Give employees and students what they need to clean their hands and cover their coughs and sneezes:**

- Provide tissues and no-touch trash cans.
- Provide soap and water in the workplace. If soap and water are not readily available, use alcohol-based hand sanitizer that is at least 60% alcohol. Ensure that adequate supplies are maintained. All employees are encouraged to wash their hands frequently and will be provided ample time to do so. Employees should wash their hands for at least twenty (20) seconds each time.
- To the extent feasible, dependent on a hazard assessment, and consistent with the School's COVID-19 Health and Safety Plan, the School will consider providing additional handwashing facilities.
- Ideally, place touchless hand sanitizer stations in multiple locations to encourage hand hygiene.
- Place posters that encourage hand hygiene to help stop the spread at the entrance to your workplace and in other workplace areas where they are likely to be seen. This should include signs for non-English speakers, as needed.
- Direct employees to visit CDC's coughing and sneezing etiquette and clean hands webpage for more information.

**8. Limit Sharing of Tools, Equipment, and PPE**

- The School will not allow any employees, students, or any other persons to share any form of PPE, including but not limited to: Gloves, facial coverings, masks, and goggles.
- To the maximum extent feasible, the School will prohibit the sharing of tools and equipment, including: Phones, headsets, desks, keyboards, and writing materials. Where sharing is required, the School will follow all cleaning and disinfection procedures, consistent with this Plan.
- On any Schools busses or other vehicles which are otherwise shared, the high touch points such as steering wheels, seatbelt buckles, armrests, and seats will be disinfected between uses, consistent with this Plan.

**9. Perform routine cleaning:**

- Follow the Guidance for Cleaning and Disinfecting to develop, implement, and maintain a plan to perform regular cleanings to reduce the risk of exposure to COVID-19.
- Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
- If surfaces are dirty, clean them using a detergent or soap and water before you disinfect them in accordance with Healthy Schools Act protocols.
- For disinfection, most common, EPA-registered, household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is available on the EPA website. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method, and contact time).
- Discourage workers from using each other's phones, desks, offices, or other work tools and equipment, when possible.
- Provide disposable disinfecting wipes so that employees can wipe down commonly used surfaces (e.g., keyboards, remote controls, desks, other work tools and equipment) before each use.
- Store and use disinfectants in a responsible and appropriate manner according to the label.
- Do not mix bleach or other cleaning and disinfection products together. This can cause fumes that could be very dangerous to breathe in.
- Advise employees to always wear gloves appropriate for the chemicals being used when they are cleaning and disinfecting and that they may need additional PPE based on the setting and product.

**10. Perform enhanced cleaning and disinfection after persons suspected/confirmed to have COVID-19 have been in the facility:**

- In the event of a suspected or confirmed COVID-19 case at the School, the School will determine all areas, materials, and equipment used by the case during the high-risk exposure period.
- Once identified, the School will follow all CDC cleaning and disinfection recommendations of all pertinent areas.
- School will complete this cleaning in the event of a positive case..

**11. Minimize risk to employees when planning meetings and gatherings:**

- Use videoconferencing or teleconferencing when possible for work-related meetings and gatherings.
- Cancel, adjust, or postpone large work-related meetings or gatherings that can only occur in-person in accordance with state and local regulations and guidance.
- When videoconferencing or teleconferencing is not possible, hold meetings in open, well-ventilated spaces continuing to maintain a distance of 6 feet apart and wear cloth face coverings.

## 12. COVID-19 Testing:

- Consistent with Cal/OSHA regulations, in the event of one (1) COVID-19 case, an outbreak<sup>12</sup>, or a major outbreak at the School campus, the School will offer COVID-19 testing to employees with exposure at no charge, and during working hours.
- In the event of one (1) COVID-19 case in the workplace, COVID-19 testing will be offered to all employees who have had potential COVID-19 exposure.
- In the event of a COVID-19 outbreak pursuant to Cal/OSHA regulations:
  - The School must provide testing to all employees who were present in the exposed workplace.
  - Pursuant to Cal/OSHA regulations, “employees in the exposed workplace shall be tested and then tested again one week later.”<sup>13</sup>
  - After the first two (2) COVID-19 tests, the School must provide continuous COVID-19 testing of employees remaining at the workplace at least once per week, until outbreak criteria are no longer met.
- In the event of a “major COVID-19 outbreak,”<sup>14</sup> the School will provide COVID-19 testing at least twice per week to all employees present at the exposed workplace during the thirty (30) day period, and who remain at the workplace. This testing regimen will continue until there are no new COVID-19 cases in the workplace for a fourteen (14) day period.
- Consistent with current Cal/OSHA regulations, the School will require certain frequencies of COVID-19 testing before allowing employees with COVID-19 exposure to return to campus.
- In the event that COVID-19 testing is mandated by Cal/OSHA regulations, School employees may procure testing for COVID-19 at:
  - Testing is provided on site at Odyssey Charter School, 725 West Altadena Drive, Altadena, CA 91001. This is in partnership with the CA Testing Task Force/COLOR.
- If COVID-19 is not mandated by Cal/OSHA regulations, but testing is otherwise needed, employees may procure testing, likely free of charge, through their local county or from their health provider.

### Record Keeping and Availability of Plan

- The School will maintain records of the steps taking to implement this Plan for at least one (1) year, consistent with 8 CCR §3202(b).
- This Plan shall be made available at the workplace to all School employees, authorized

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<sup>12</sup> An outbreak is defined by Cal/OSHA as one that is declared by the local public health department, or where there are three or more cases on campus within a 14-day period. 8 CCR §3205.1(a)(1). Recent Cal/OSHA “FAQ” further indicates that “Any confirmed COVID-19 case who has been in the exposed workplace during the high-risk exposure period counts towards the three-case threshold.” As such, outbreak threshold under the Cal/OSHA regulations could be met by way of students who test positive on campus.

<sup>13</sup> 8 CCR §3205.1(b)(2)A).

<sup>14</sup> Cal/OSHA defines a major outbreak as “20 or more COVID-19 cases in an exposed workplace within a 30-day period.”

representatives, and Cal/OSHA representatives immediately upon request.

- The School will track all COVID-19 cases, by keeping a record of the employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. Medical information shall be kept confidential. The information shall be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

The Executive Director is authorized to implement changes or additions to this addendum in order to ensure compliance with new or revised orders or guidance from local, county, state or federal authorities ("Agencies") and/or the facts of a specific circumstance, and to take any and all actions consistent with orders and guidance from the Agencies that is not specifically addressed by this policy. The Executive Director shall provide the Board with regular updates as to actions taken pursuant to this section.

## Appendix A: Controls Table

The following table presents examples of controls to implement in the workplace. The most effective controls are those that rely on engineering solutions, followed by administrative controls, then PPE. PPE is the least effective control method and the most difficult to implement. Worksites may have to implement multiple complementary controls from these columns to effectively control the hazard.

<b>Engineering (Facilities and Equipment)</b>
<ul style="list-style-type: none"> <li>• Assess job hazards for feasibility of engineering controls</li> <li>• Ensure ventilation and water systems operate properly</li> <li>• Alter office workspaces to maintain social distancing. Examples include:             <ul style="list-style-type: none"> <li>○ Configure partitions as a barrier shield</li> <li>○ Move electronic payment reader away from cashier in cafeteria</li> <li>○ Use verbal announcements, signage, and visual cues to promote social distancing</li> <li>○ Remove/rearrange furniture</li> </ul> </li> </ul>
<b>Administrative</b>
<p><b>Management and Communications</b></p> <ul style="list-style-type: none"> <li>• Monitor state and local public health communications about COVID-19</li> <li>• Require students who are ill to stay home</li> <li>• Encourage sick workers to report symptoms, stay home, and follow CDC guidance</li> <li>• Remind staff of available support services</li> <li>• Communicate to partners, suppliers, other contractors on policies and practices</li> <li>• Encourage social distancing and the use of cloth face coverings (if appropriate) in the workplace</li> <li>• Use technology to promote social distancing (e.g., telework and virtual meetings)</li> <li>• Cancel group events</li> <li>• Close/limit use of shared spaces</li> <li>• Consider policies that encourage flexible sick leave and alternative work schedules.</li> </ul> <p><b>Cleaning and Disinfection</b></p> <ul style="list-style-type: none"> <li>• Clean and disinfect frequently touched surfaces, (e.g., counters, shelving, displays)</li> <li>• Provide employees with disposable disinfectant wipes, cleaner, or sprays that are effective against COVID-19</li> </ul> <p><b>Training</b></p> <p>Provide employees with training on:</p> <ul style="list-style-type: none"> <li>• Symptoms, emergency warning signs and high-factors for COVID-19</li> <li>• Policies to reduce the spread of COVID-19</li> <li>• Information regarding COVID-19 transmission, including that COVID-19 “is an infectious disease that can be spread through the air when an infectious person talks, vocalizes, sneezes, coughs, or exhales; as well as that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth; as well as that infectious people may have no symptoms.”</li> </ul>



- Information regarding the fact that particles containing the virus can travel more than six (6) feet, especially indoors; and thus, why social distancing, proper hygiene, and PPE are so important.
- General hygiene
- Cleaning and disinfection
- Cloth face coverings
- Social distancing
- Use of PPE
- Safe work practices
- COVID-19 related benefits under federal, state, and local law, including any potential benefits under current workers' compensation laws, the Families First Coronavirus Response Act ("FFCRA"), the School's leave policies, and any other rights by contract or collective bargaining agreement.

#### **Personal Protective Equipment (PPE)**

- Conduct workplace hazard assessment
- Determine what PPE is needed for their workers' specific job duties based on hazards and other controls present
- Select and provide appropriate PPE to the workers at no cost, and train employees in the use of the PPE.