

## **CSP Injury and Illness Prevention Plan: COVID-19 Addendum for Odyssey Charter Schools**

*Approved by the Odyssey Charter School Governing Board on August 5, 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 and public health requirements. Charter 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:

1. Part one (1) contains background information regarding COVID-19, including known symptoms, emergency warning signs and high-risk factors;
2. 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;
3. 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 or already reopened.

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/ 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.

### **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. If the Charter School conducts screenings indoors at the workplace, the employer shall ensure that face coverings<sup>1</sup> are used during screening by both screeners and employees, and if temperatures are measured, non-contact thermometers are used.

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<sup>1</sup> Cal/OSHA defines "face coverings" as "a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. A face covering has no visible holes or openings and must cover the nose and mouth. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric."

- 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. This includes an evaluation of employees' potential workplace exposure to all persons at the workplace or who may enter the workplace, including coworkers, students, employees of other entities, members of the public, customers or clients, and independent contractors. During this evaluation, the Charter School will also consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing stationary work locations.
- 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 and their exclusive representative, if any, 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.
- In consultation with employees' exclusive representatives, 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.

- o If employees and/or exclusive representatives 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:
  - o Determine what PPE is needed for each workers' specific job duties,
  - o Select and provide appropriate PPE to the workers at no cost, and
  - o 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. COVID-19 Vaccination Status**

Consistent with Cal/OSHA regulations and applicable law, the School must impose different health and safety requirements, depending on an employee's COVID-19 vaccination status. Cal/OSHA defines an individual as fully vaccinated when "the employer has documented that the person received, at least 14 days prior, either the second dose in a two-dose COVID-19 vaccine series or a single-dose COVID-19 vaccine. Vaccines must be FDA approved; have an emergency use authorization from the FDA; or, for persons fully vaccinated outside the United States, be listed for emergency use by the World Health Organization (WHO)." As a result, to forego any potential COVID-19 health and safety restrictions, such as exclusion/quarantine periods, some COVID-19 testing and other directives, employees must [provide the Charter School with proof of COVID-19 vaccination] OR [complete a COVID-19 vaccination status attestation]. Employees who are either unvaccinated or who decline to [provide the Charter School with proof of COVID-19 vaccination] OR [attest to their COVID-19 vaccination status] will be considered unvaccinated, and must comply with all health and safety directives, as stated in this policy.

#### **5. 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>2</sup> in the workplace, the School will:
  - o 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.

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<sup>2</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.

- o Investigate whether other School employees or any other third parties may have had a close contact exposure COVID-19 exposure<sup>3</sup> by evaluating the activities of the COVID-19 case at the School campus during the “high-risk exposure period”<sup>4</sup>.
    - Give notice of potential exposure, within one (1) business day, and without revealing any personal identifying information<sup>5</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.
  - o Make COVID-19 testing available at not cost, during paid time to all Charter School employees who had close contacts exposure in the workplace.
  - o Provide all employees who had close contacts exposure in the workplace with information regarding:
    - 1) COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick and vaccination leave, if applicable, workers’ compensation law, local governmental requirements, Charter School leave policies as well as any leave guaranteed by contract and/or Cal/OSHA;
    - 2) Potential COVID-19 exclusion pay eligibility, if applicable.
  - o Consistent with Cal/OSHA legal authority, the Charter School will not offer the above-referenced testing nor provide the above referenced information to employees with close contacts exposure, if either of the following apply:
    - 1) If the exposed employee was fully vaccinated against COVID-19 prior to the close contacts exposure and does not have any COVID-19 symptoms, or
    - 2) The exposed employee has remained free of COVID-19 symptoms, for ninety (90) days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed symptoms, for ninety (90) days after the first positive test
  - o 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:
    - o All employees with close contacts to COVID-19 exposure shall be excluded from the School campus until the following criteria have been satisfied:
      - If an employee develops any COVID-19 symptoms, the employee may return after:

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<sup>3</sup> Close contact” is defined by Cal/OSHA as “being within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” defined by this section. This definition applies regardless of the use of face coverings.”

<sup>4</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>5</sup> All personally identifying information related to COVID-19 cases or those will COVID-19 symptoms shall be kept confidential. However certain information may be provided to public health authorities, as required by law.

- 1) The employee tested negative for COVID-19 using a polymerase chain reaction (“PCR”) COVID-19 test with specimen taken after the onset of symptoms;
  - 2) At least ten (10) days have passed since the last known close contact; and
  - 3) The person has been symptom-free for at least twenty-four (24) hours, without using fever-reducing medications.
- o Employees with close contacts exposure are not required to be excluded from the Charter School campus after close contact s COVID-19 exposure if either of the following apply:
  - 1) The employee was fully vaccinated before the close contact and has not developed any COVID-19 symptoms; or
  - 2) The employee has remained free of COVID-19 symptoms, for ninety (90) days after the initial onset of COVID-19 symptoms or, for COVID-19 cases who never developed COVID-19 symptoms, for ninety (90) days after the first positive test.
- o Charter School employees with confirmed COVID-19, regardless of vaccination status must be excluded from campus as follows:
  - For Employees who test positive and have COVID-19 symptoms
    - 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.
  - Once an employee with confirmed COVID-19 has complied with these requirements, depending on whether they are symptomatic or asymptomatic, the Charter School will not require such employees present a negative COVID-19 test before returning to work
- o Employees excluded from campus due to close contact COVID-19 exposure may be entitled to salary continuation during the applicable exclusion period. The Charter School will provide employees with California COVID-19 Supplemental Paid Sick Leave or emergency paid sick leave pursuant to the Families First Coronavirus Response Act (“FFCRA”), if available, during this period. If an employee is not eligible for California COVID-19 Supplemental Paid Sick Leave or otherwise has no such leave available, the Charter School may elect to provide paid sick leave during this period.
- o Employees excluded from work due to close contact COVID-19 exposure are not entitled to salary continuation if either of the following applies:
  - If a COVID-19 case is not work-related pursuant to all applicable workers’ compensation laws. However the employee may still be eligible for California COVID-19 Supplemental Paid Sick Leave during this period or FFCRA leave; or
  - If an employee received payments or was covered by workers

compensation and received temporary disability.

- 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>6</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>7</sup> as the qualifying individual<sup>8</sup> within the infectious period<sup>9</sup> that they may have been exposed to COVID-19.<sup>10</sup>
- (b) Provide a written notice to the exclusive representative, if any, of the above employees.<sup>11</sup>
- (c) Provide all employees who may have been exposed and the exclusive representative,

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<sup>6</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>7</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>8</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).)

<sup>9</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>10</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>11</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.

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>12</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.

### **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. As a result, employees may request a legally recognized accommodation related to such conditions. While the School will work to provide reasonable accommodations where applicable, the School cannot guarantee the availability of any specific accommodations. Such accommodations could include, but are not limited to:

- 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.

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<sup>12</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).)

- 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.
- Communicate how employees may request medical or other legally recognized accommodations from mandatory conditions of employment or continued employment with the School. Employees who wish to request a legally recognized accommodation may contact human resources via email at [hr@ocsmail.org](mailto:hr@ocsmail.org)
- Use a hotline or another method for employees to voice concerns anonymously. Rachelle 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. Facial Coverings**

- Until lifted, the CDPH has ordered that all persons in K-12 Schools, childcare and youth settings must wear a face covering at all times while indoors, regardless of vaccination status.
- The Charter School will provide employees with such face coverings and ensure they are worn when indoors, in vehicles and elsewhere as required by the CDPH or local public health authorities.
- The Charter School will ensure that face coverings are clean and undamaged, and that they are worn over the nose and mouth. Face shields are not a replacement for face coverings, although they may be worn together for additional protection,
- Employees are not required to wear face coverings in the following situations:
  - 1) When an employee is alone in a room or vehicle,
  - 2) While eating or drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent feasible possible,
  - 3) Employees wearing respirators required by the employer and used in compliance in accordance with all safety guidelines,
  - 4) 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,
  - 5) Specific tasks which cannot feasibly be performed with a face covering. This

exception is limited to the time period in which such tasks are actually being performed.

- If an employee is not wearing a face covering pursuant to any of the above-referenced five (5) exceptions, and is not wearing a face shield, the employee shall be at least six (6) feet away from all other persons while indoors, unless the employee is either fully vaccinated against COVID-19 or tests for COVID-19 at least once per week during paid time and at no cost to the employee. This exception must not be used as an alternative to the above-referenced face covering requirement, unless one of these five (5) exceptions apply.
- Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
- The Charter School will not prevent an employee from wearing a face covering when not required by this Policy or applicable law, unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- Even if face coverings are not required by Policy or applicable law, the Charter School will provide face coverings to any employee, upon request.
- The Charter School will implement measures to communicate to students and other non-employees the face coverings requirements on campus.

## **5. Respirators and PPE**

- The Charter School will evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide such personal protective equipment as needed.
- Upon request, the Charter School shall provide respirators for voluntary use to all employees who are not fully vaccinated and who are working indoors or in vehicles with more than one (1) person. If any employees are voluntarily using such respirators, the Charter School will encourage their use and ensure employees are provided with the correct respirator size.

## **6. Engineering Controls**

- 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 bimonthly 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.
- To the extent feasible, the Charter School will consider whether the use of portable or mounted High Efficiency Particulate Air (“HEPA”) filtration units, or other air cleaning

systems, would reduce the risk of COVID-19 transmission on campus.

## **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 Charter 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 Charter 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 Charter Schools busses or other vehicles which are otherwise shared, the high touch points such as steering wheels, seat belt buckles, armrests, and seats will be disinfected between uses, consistent with this Plan.

## **9. Perform routine cleaning:**

- Follow the CDC 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 Charter School, the Charter 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. This will specifically include disinfection of the area, material or equipment used by the COVID-19 case, and which will be used by another employee within the next twenty-four (24) hours

**11. COVID-19 Testing:**

- If an employee has COVID-19 symptoms, the Charter School will make COVID-19 testing available to such employees at no cost and during paid time, if such employees are not fully vaccinated against COVID-19.
- In the event of one (1) confirmed case on campus, the Charter School will make COVID-19 testing available at no cost, during paid time to all Charter School employees who had close contacts exposure in the workplace.
- In the event of one (1) COVID-19 case, an outbreak<sup>13</sup>, or a major outbreak at the Charter School campus, the School will make -COVID-19 testing available during paid time to all employees who had close contact exposure to COVID-19 in the workplace
- In the event of a COVID-19 outbreak pursuant to Cal/OSHA regulations:
  - The Charter School will make COVID-19 testing available at no cost to its employees within the exposed group , during employees' paid time, unless:
    - 1) The employee was not present at the Charter School campus during the relevant fourteen (14) day period,
    - 2) The employee was fully vaccinated before the outbreak occurred and does not have COVID-19 symptoms, or

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<sup>13</sup> An outbreak is defined by Cal/OSHA occurs when three or more employee COVID-19 cases within an exposed group visited the workplace during their high-risk exposure period at any time during a 14-day period," and applies until there are "no new COVID-19 cases detected in the exposed group a workplace for a 14-day period."

- 3) If an employee had COVID-19 within the last ninety (90) days.
  - o After initially offering COVID-19 testing to all employees in an exposed group, the Charter School will make such testing available again one (1) week later.
  - o After these first two (2) COVID-19 tests, the Charter School will make COVID-19 testing available once a week at no cost, during paid time, to all employees in the exposed group who remain at the workplace until there is no longer an outbreak.
- In the event of a “major COVID-19 outbreak,”<sup>14</sup> the charter School will provide COVID-19 testing as outlined above for outbreak situations, except that such testing will be made available to all employees, regardless of their COVID-19 vaccination status.
- 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, all Charter School employees may procure testing for COVID-19 at:
  - o 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.
- The Charter School reserves the right to require employees undergo additional frequencies of COVID-19 testing, consistent with applicable authority, and directives from public health authorities as well as the School’s authorizer, regardless of an employee’s COVID-19 vaccination status. Further information regarding applicable cadences for COVID-19 testing may be found in the COVID-19 Health and Safety Policy.

### **Record Keeping and Availability of Plan**

- The Charter 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 Charter School employees, authorized representatives, and Cal/OSHA representatives immediately upon request.
- The Charter 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.

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<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.” and applies “until there are fewer than three COVID-19 cases detected in the exposed group for a 14-day period.”

## 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> </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, including face covering requirements.</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>● The Charter School’s COVID-19 procedures are designed to protect employees from COVID-19 exposure and hazards, as well as how employees can participate in the identification and evaluation of potential COVID-19 hazards.</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> <li>● COVID-19 related benefits under federal, state, and local law, including any potential benefits under current workers’ compensation laws, California COVID-19 Supplemental Paid Sick leave, FFCRA,</li> <li>● Information regarding the fact that particles containing the virus can travel more than six (6) feet, especially indoors; and thus, why social distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 but are most effective when used in combination.</li> <li>● General hygiene</li> <li>● Cleaning and disinfection</li> </ul>

- Cloth face coverings
- Use of PPE
- Safe work practices
- Stress Management
- The Charter School's policies for providing respirators, and the right of employees who are not fully vaccinated to request a respirator for voluntary use, without fear of retaliation and at no cost to employees, including:
  - 1) How to properly wear the respirator provided; and
  - 2) How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair interferes with a seal.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. COVID-19 is an airborne disease. N95s and more protective respirators protect the users from airborne disease while face coverings primarily protect people around the user.

#### **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.