

**COVID-19 PREVENTION PROGRAM
(CPP)**

**MARCUM-ILLINOIS
UNION SCHOOL DISTRICT**

Maggie Irby, Superintendent

Updated, September 2021, February 2022, August 2022

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Introduction

The COVID-19 Prevention Program (CPP) addendum to the Injury and Illness Prevention Program (IIPP) has been developed and implemented pursuant to Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)) updated May 6, 2022. This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in the workplace.

Authority and Responsibility

The Marcum-Illinois Union Elementary School District Superintendent has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

System for Communicating

It is the district's goal to have effective two-way communication with employees, in a form they can readily understand. All employees of the district are to, without fear of reprisal, report to the Superintendent or designee any of the following:

Personal Symptoms or Exposure:

- To Whom: Employees are to report personal symptoms, exposures, and positive COVID-19 tests to Maggie Irby, Contact Tracer.
- How: Employees should report this information immediately by email or phone call.
- When: Immediately

Possible COVID-19 hazards at the workplace:

- To Whom: Hazards should be reported to the Superintendent or designee.
- How: Hazards can be reported in person, by email, or phone call.
- When: Immediately

Employees who are at a higher risk for complications as a result of COVID-19, can request a meeting with the Superintendent.

Employees wishing to access COVID-19 testing, where testing is not required, will be offered a self-test, be tested onsite, or will be directed to their health care provider or county health department. In the event the district is required to provide testing because of a workplace exposure or outbreak, the district will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.

The district will follow the procedures in Section, *Identification and Evaluation of COVID-19 Hazards*, to identify and evaluate COVID-19 hazards. Employees will be notified of potential hazards, what is being done to control those hazards, and the district's COVID-19 policies and procedures through training and this CPP.

Identification and Evaluation of COVID-19 Hazards

The following procedures will be put in place to identify and evaluate COVID-19 hazards:

- Conduct workplace-specific evaluations using the *Appendix A: Identification of COVID-19 Hazards* form.
- In accordance with the state health order, all staff must be vaccinated or they will need weekly COVID-19 testing.
- Document the vaccination status of our employees using *Appendix E: Documentation of Employee COVID-19 Vaccination Status*, which is maintained as a confidential medical record.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, this workplace.
- Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the

- workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the 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 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 COVID-19 policies and procedures.

The district will monitor and review applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention. Maggie Irby, Superintendent, receives updates on COVID cases, trends, updates to guidance, and other COVID-19 health impacts to schools.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by notifying the Superintendent of any concerns of potential hazards so they can be addressed.

Employee Screening

We screen our employees by requiring them to self-screen each day before entering campus according to CDPH 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 Superintendent will ensure that hazards identified on the inspection forms are addressed within one business day.

Control of COVID-19 Hazards

Engineering Controls

The district will evaluate whether it is necessary to implement barriers during an outbreak (3 or more cases in an exposed group of employees). The district will implement barriers during a major outbreak (20 or more cases in an exposed group of employees).

For indoor locations, the district has evaluated how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system. Marcum-Illinois offers air purifying machines for workspaces and classrooms and maintains the ventilation systems by regularly replacing all filters and servicing any needed repairs.

Face Coverings

The district provides clean, undamaged face coverings and ensures they are properly worn over the nose and mouth when required by orders from the California Department of Public Health (CDPH) or local health department. COVID-19 testing cannot be used as an alternative to face coverings when face coverings are otherwise required. The district ensures the face coverings used in the workplace meet the section 3205(b)(8) "face covering" definition and requirements. Information will be provided to staff on proper use, removal, and washing of cloth face coverings.

The district will not prevent any employee from wearing a face covering when not required, unless it would create a safety hazard, such as interfering with the safe operation of equipment. The district will not retaliate against employees for wearing face coverings.

Hand Sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluated handwashing facilities.
- Added additional handwashing facilities.
- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e., methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.

Personal Protective Equipment (PPE) Used to Control Employees' Exposure to COVID-19

The district will evaluate the need for PPE (such as glove, goggles, and face shields) as required by section 3380, and provide and ensure use of such PPE as needed. If the district identifies COVID-19 as a workplace hazard, it will select and provide exposed employees with properly fitting PPE that will effectively protect employees.

Employees will be provided approved respirators ("*respirator*" means a respiratory protection device approved by the National Institute for Occupational Safety and Health (NIOSH) to protect the wearer from particulate matter, such as an N95 mask) for voluntary use when working indoors or in a vehicle with others upon request to the superintendent. If there is a major outbreak, the district will provide any employee in the exposed group with approved respirators for voluntary use. Once requested, respirators will be provided as soon as possible and will be the appropriate size. We provide and ensure use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.

Investigating and Responding to COVID-19 Cases

Procedure to investigate COVID-19 cases in the workplace:

- The contact tracer will:
 - Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s), diagnosis, and/or the date the onset of COVID-19 symptoms, if any were experienced.
 - Evaluate the activities of the COVID-19 case and all locations at the workplace which may have been visited during the high-risk exposure period, to determine potential exposures.
 - Receive information regarding COVID-19 test results and identify and record COVID-19 cases

Response to a COVID-19 case in the workplace:

- Maggie Irby, Superintendent, conducts interviews and completes required reporting.
- The district gives written notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
 - All employees who may have had COVID-19 exposure and when appropriate, their authorized representatives.
 - Independent contractors and other employers present at the workplace during the high-risk exposure period.
- The district offers COVID-19 testing at no cost to employees during their working hours to:
 - Symptomatic employees, regardless of whether there is a known exposure
 - All employees, regardless of vaccination status, who have had close contact with a COVID-19 case, except for recently recovered employees.
 - All employees except for recently recovered employees, regardless of vaccination status, in an outbreak (weekly) or a major outbreak (twice a week).

- After each incident, the leadership team, investigates whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

All personally identifying information regarding COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing, or related medical services provided by the employer shall be provided in a manner that ensures the confidentiality of employees. All Employee medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace.

Exclusion of COVID-19 Cases and Employees who had a Close Contact

The district will follow the latest CDPH, Sutter County Public Health, and Cal/OSHA guidance. At the time of exclusion, the district shall provide the employee with information on available benefits.

Return-to-Work Criteria

The district will follow the latest CDPH, Sutter County Public Health, and Cal/OSHA guidance.

Close Contact:

The district will follow CDPH, Sutter County Public Health, and Cal/OSHA guidance.

Reporting, Recordkeeping, and Access

It is district policy to:

- Report information about COVID-19 cases at the 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 the written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- 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.

Training and Instruction

The district training may consist of reviewing written documentation, online video trainings and/or acknowledge receipt of the District's COVID-19 Prevention Plan (CPP). Training and instruction will include:

- The district's COVID-19 policies and procedures to protect employees from COVID-19 hazards, and how to participate in the identification and evaluation of COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- The right of employees to request a respirator (N95) for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained according to section 5144(c)(2) requirements:
 - How to properly wear them.

- How to perform a seal check according to the manufacturer’s instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- The 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.
 - The conditions where face coverings must be worn at the workplace.
 - Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

Appendix D: COVID-19 Training Roster will be used to document this training.

Maggie Irby, Superintendent/Principal

Date

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: _____

Date: _____

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

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

Make copies as needed

Appendix B: COVID-19 Inspections

Date: _____ Work location evaluated: _____

Name of person conducting the inspection: _____

Exposure Controls	Status	Notes	Person Assigned to Correct	Date Corrected
Engineering				
Barriers/partitions				
Ventilation (amount of fresh air and filtration maximized)				
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				
Face coverings (cleaned sufficiently often)				
Gloves				
Face shields/goggles				

Make copies as needed

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.

Staff involved in investigation:		Date investigation initiated:	
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Employee name:		Was COVID-19 test offered?	
Date of the positive or negative test and/or diagnosis:		Occupation/Location employee worked:	

Date and time the COVID-19 case was last present in the workplace:		Workplace locations that may have been visited by the COVID-19 case during the high-risk exposure period	
Who may have been exposed			

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

Appendix F: Multiple COVID-19 Infections and COVID-19 Outbreaks

Appendix E applies only if the workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in the workplace within a 14-day period (see [3205.1](#) for details).

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

The district will follow all CDPH and Cal/OSHA guidelines regarding testing, masking, and physical distancing.

Exclusion of COVID-19 Cases

Marcum-Illinois will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with CDPH guidelines and local health officer orders if applicable.

Investigation of Workplace COVID-19 illness

The district 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:
 - Leave policies and practices and whether employees are discouraged from remaining home when sick.
 - 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.
 - Requiring respiratory protection in compliance with section 5144..

Buildings or Structures with Mechanical Ventilation

The district will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible, filters with the highest compatible filtering efficiency will be used. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning systems would reduce the risk of transmission and, if so, implement their use to the degree feasible.

Notifications to the Local Health Department

Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in the workplace, the district's contract tracer will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.

The district 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.