

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

**MARCUM-ILLINOIS
UNION SCHOOL DISTRICT**

Maggie Irby, Superintendent

January 2021, Updated, September 2021, Updated February 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 June 17, 2021. 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 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, is on a COVID-19 Task Force that meets with the Yuba/Sutter Public Health Department representative and other Sutter County Superintendents and 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

Cleaning and Disinfecting

Marcum-Illinois has established routine schedules and ensures there are adequate supplies to clean and disinfect common surfaces and objects in the workplace. This includes, but is not limited to, technology devices, office equipment, counters, tables, desks, chairs, door handles, drinking fountains, restroom and bathroom surfaces, and buses. Sanitizing wipes and/or sprays will be available for staff to wipe high touch surfaces before use.

The process of disinfecting includes providing disinfecting products that are EPA approved for use against the virus that causes COVID-19 and following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time). The district will inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.

Should there be a COVID-19 case in the workplace, the following procedures will be implemented:

- Areas will be closed off and not used before cleaning and disinfecting.
 - To reduce risk of exposure, custodial staff will wait 24 hours before cleaning and disinfecting.
 - If it is not possible to wait 24 hours, staff will wait as long as feasible before cleaning and disinfecting.
- Open outside doors and windows to increase air circulation in the area.
- Clean and disinfect all areas and equipment used by the sick person.
- Wash hands immediately after removing gloves and after contact with a sick person.
- If more than 7 days since the sick person visited or used the facility, additional cleaning and disinfection is

- not necessary.
- Continue routine cleaning and disinfecting

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 indoors, and where required by orders from the California Department of Public Health (CDPH) or local health department. The district ensures the face coverings used in the workplace meet the section 3205(b)(8) "face covering" definition and requirements, and the 3205(b)(9) definition of "fully vaccinated" is applied. Face coverings are not required outdoors (except during outbreaks) regardless of vaccination status. Workers will be trained on CDPH recommendations for outdoor use of face coverings. Information will be provided to staff on [proper use, removal, and washing of cloth face coverings.](#)

The following are exceptions to the requirement to wear face coverings indoors:

- When an employee is alone in a room or vehicle.
- While eating and drinking.
- 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. These employees will meet with the Superintendent to determine reasonable accommodations.
- Per CDPH guidance, teachers may use face shields with a drape, to enable students to see their faces and to avoid potential barriers to phonological instruction.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

COVID-19 testing cannot be used as an alternative to face coverings when face coverings are otherwise required.

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.

The district has posted signs to communicate to non-employees the face coverings requirements on the premises. In an effort to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, the campus is closed to all non-essential personnel and visitors and face coverings are required by *ALL* adults and students TK-8th grade.

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.

Physical Distancing

As stated by the CDPH, "Recent evidence indicates that in-person instruction can occur safely without minimum physical distancing requirements when other mitigation strategies (e.g., masking) are implemented." However, we encourage the use of distancing as much as practicable to decrease unnecessary close proximity, while still allowing for a full in-person instructional program. The district will evaluate whether it is necessary to implement physical distancing during an outbreak (3 or more cases in an exposed group of employees). The district will implement physical distancing during a major outbreak (20 or more cases in an exposed group of employees).

Where possible, we encourage physical distancing in the workplace by:

- Increasing physical space between employees by modifying the workspace and/or the use of physical barriers such as partitions.
- Avoiding shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) when possible. If they must be shared, cleaning and disinfecting shared workspaces and work items before and after use.
- Reducing visitors on campus.
- Increasing seating and adding outdoor seating when practicable in staff break room areas.
- Holding meetings in well ventilated spaces with as much spacing as practicable if a virtual meeting is not feasible.

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.

Unvaccinated employees will be provided approved respirators 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:

- *Appendix C: Investigating COVID-19 Cases* form will be used to verify COVID-19 case status, receive information regarding COVID-19 test results and onset of COVID-19 symptoms, and identify and record COVID-19 cases. 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.

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 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 unvaccinated 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).
- When following CDPH’s Isolation and Quarantine Guidance to keep employees working or return them sooner, if tested.
- The district will provide employees with the information on benefits
- 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.

For employees excluded from work, the district shall continue and maintain an employee’s earnings, seniority, and all other employee rights and benefits as if the employee had not been removed from their job. The district may use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers’ compensation. This does not limit any other applicable law, employer policy, or collective bargaining agreement that provides for greater protections. At the time of exclusion, the district shall provide the employee with information on available benefits as described in Training and Instructions and Exclusion of COVID-19 Cases.

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.

A negative COVID-19 test shall not be required for an employee to return to work once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met. If an order to isolate or quarantine an employee is issued by a local or state health official the employee shall not return to work until the period of isolation or quarantine is completed or the order is lifted. When employees who are fully vaccinated, regardless of whether they are booster-eligible or boosted, cannot be tested as required by CDPH quarantine guidance, those employees must wear face coverings and physically distance (six feet) from others for 14 days if they are to be exempted from the exclusion requirements after a close contact.

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.

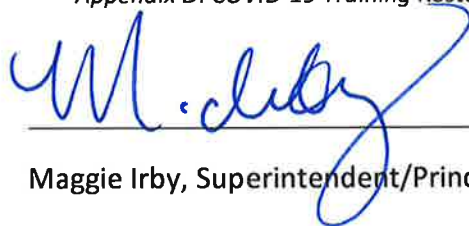
- Use the *Appendix C: Investigating COVID-19 Cases* form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Training and Instruction

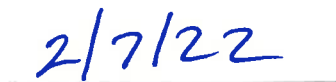
The district training may consist of reviewing written documentation, online video trainings and/or acknowledge receipt of the District's COVID-19 Prevention Plan (CPP). Training and instruction will include:

- 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 that are not fully vaccinated to request a respirator 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 fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since 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.
 - The conditions where face coverings must be worn at the workplace.
 - That face coverings are additionally recommended outdoors for people who are not fully vaccinated if six feet of distance cannot be maintained.
 - 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	
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Who may have been exposed	
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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 provide COVID-19 testing to all employees, during paid time, in the exposed workplace except for:

- Employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period.
- Employees who were fully vaccinated before the multiple infections or outbreak and who do not have symptoms.
- COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria, no testing is required for 90 days after the initial onset of symptoms or, for COVID-19 cases who never developed symptoms, 90 days after the first positive test.

COVID-19 testing consists of the following:

- All employees in the exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
- After the first two COVID-19 tests, the district will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in the workplace for a 14-day period.
- Additional testing will be provided when deemed necessary by Cal/OSHA.

We continue to comply with the applicable elements of our CPP, as well as the following:

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.

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 our CPP *Exclusion of COVID-19 Cases* and *Return to Work Criteria* requirements, and local health officer orders if applicable.

Investigation of Workplace COVID-19 illness

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.