

COVID-19 Prevention Program (CPP) for Santa Clara County Office of Education (SCCOE)

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

Date: December 31, 2023

Authority and Responsibility

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

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Managers who engage independent contractors or other individuals in work on SCCOE worksites shall evaluate potential workplace exposures to all persons that may enter the workplace.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

The SCCOE welcomes employees and union representatives to identify COVID-19 hazards that may or may not have been identified by the SCCOE. We need to work together to identify potential hazards that may be undetected. This includes informing supervisors/managers/Human Resources of unidentified potential COVID-19 hazards that are new to the workplace, or existing hazards that are created by those employees who fail to follow guidelines. The SCCOE encourages all employees to actively engage in COVID-19 hazard identification to prevent COVID-19 exposure in the workplace.

Management shall regularly evaluate existing COVID-19 prevention controls in the workplace and the need for different or additional controls.

Employees shall be educated and empowered by management to respectfully remind others to follow all policies, procedures, and practices adopted related to COVID-19. Employees may also report the occurrence to a Supervisor or COVID-19 Warm Line [408-453-6651] to investigate or correct the behavior.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form or other similar form, and corrected in a timely manner based on the severity of the hazards, as follows:

The severity of the hazard will be investigated and assessed, and correction time frames assigned, accordingly. Interviews with individuals who are familiar with the condition, practice or procedure being inspected may be conducted.

Individuals will be identified as being responsible for timely correction.

Follow-up measures such as check-ins or walk-through visits will be taken to ensure timely implementation of necessary changes.

Control of COVID-19 Hazards

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Face coverings will be provided or replaced as needed. Replacements may be located in the classrooms, isolation rooms, SCCOE Main Lobby, and departments will have face covering supplies in their areas. These face coverings are a layer of protection to supplement physical distancing, personal hygiene, and additional cleaning and disinfecting protocols and best practices.

The following are exceptions to the use of face coverings in our workplace when directed:

- When an employee is alone in a room or designated workspace.
- While eating and drinking at the workplace, and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

Engineering controls

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

- Employees shall be informed to keep doors and windows open to the extent feasible.
- Employees will be informed about circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- Ventilation systems will receive regular maintenance to ensure cleanliness and functionality.
- Assessments will be conducted to determine the possibility to increase filtration efficiency to the highest level compatible with the existing ventilation systems.
- Filters for ventilation system will be checked and replaced regularly.
- MERV 13 level HEPA filters will be installed if compatible with the ventilation system.
- We will regularly review information on state, local, and CDC public health guidance on air and shall implement recommendations when necessary.
- Portable HEPA filtration units will be provided in school spaces without operable windows.

Cleaning and disinfecting

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

- At least daily, and more frequently if feasible, clean and disinfect frequently touched hard surfaces (e.g., tables, desks, chairs, door handles, light switches, phones, copy/fax machines, bathroom surfaces (toilets, countertops, faucets), drinking fountains, and playground equipment) and shared objects (toys, games, art supplies, books) pursuant to CDC guidance.
- Adequate supplies and adequate time will be given to cleaning and disinfecting to be done properly.

- All employees and authorized employee representatives will be informed of the frequency and scope of cleaning and disinfection.
- Cleaning and disinfection of areas must be done in a manner that does not create a hazard to employees.
- All staff shall be trained and required to sanitize shared spaces or items. Staff will be properly trained and provided with the appropriate PPE including gloves.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

Cleaning staff should clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment (like tablets, touch screens, keyboards, remote controls) used by the ill persons, focusing especially on frequently touched surfaces.

Shared tools, equipment, and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles, surgical masks, respirators, and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible.

Where there must be sharing, the items will be disinfected between uses by the employee.

Cleaning/sanitizing materials will be readily available to all employees. Employees will be trained on the proper use of available cleaning products.

Hand sanitizing

In order to implement effective hand sanitizing procedures:

- Handwashing facilities will be evaluated to determine if additional facilities are needed.
- Employees will be allowed time for employee handwashing. Additional time will be given for employees to wash hands often.
- Employees shall be provided with information on and encouraged to engage in proper handwashing including washing their hands for 20 seconds.
- Employees will be provided with an effective hand sanitizer and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol). Hand sanitizer will be available in multiple locations.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144. Where respirator use is required, we will ensure that employees undergo medical evaluations and proper fit testing in accordance with the SCCOE Respiratory Protection Program.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

PPE, such as but not limited to gloves, goggles, face coverings, and face shields shall not be shared.

Investigating and Responding to COVID-19 Cases

Investigating and responding to COVID-19 exposure cases will be conducted and documented by trained designees who will also coordinate any required notices to employees who may have been exposed.

Employees who had potential COVID-19 exposure in our workplace will be:

Offered COVID-19 testing at no cost during their working hours. Testing may be accomplished through Over the Counter (OTC) COVID-19 rapid test kits distributed by SCCOE.

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Employees should immediately report any signs or symptoms of the virus or a positive test result to their supervisor and the designated Human Resources, or COVID-19 Designee. Employees should also similarly immediately inform their supervisor/manager/Human Resources if they believe they have possibly been exposed to any COVID-19 hazard in the workplace. A failure to report may be considered a safety violation, subject to the discretion of the SCCOE. Any employee that reports any of the items above should do so without fear of reprisal. The SCCOE has a strict non-retaliation and non-discrimination policy and will not tolerate anyone retaliating against, discriminating against, or harassing any employee for informing the employer about any of the information in this paragraph.
- If there is an event that requires the SCCOE to provide employees with testing, such as if there are multiple COVID-19 cases at the facility, the SCCOE will provide employees with access to testing through Over the Counter (OTC) test kits, Santa Clara County testing centers, SCCOE vendors, or employee's medical provider. Affected employees will be informed as to why testing is being offered. All tests will be conducted during work hours. Affected employees are expected to inform their supervisor, Human Resources, or their COVID-19 designee that they will be going to take a test.
- The SCCOE will provide employees with notification in accordance with AB 685/California Labor Code § 6409.6 and this policy. Each employee that may have had COVID-19 exposure during a high-risk period will receive notification of the exposure. Personal identifying information of the COVID-19 positive case will not be provided to the employee or any other person unless specifically required by law or regulation. Authorized representatives including will also receive notice of the COVID-19 exposure in accordance with this Policy and AB 685/California Labor Code § 6409.6 The SCCOE will also contact independent contractors or subcontractors that were at the workplace during the high-risk exposure period, who may have had COVID-19 exposure.
- When testing is not required, employees may access their health provider, local testing center, or employer provided testing centers available at school sites. Additionally, SCCOE provides OTC test kits to employees for routine testing as necessary for employees. The purpose of voluntary testing is to give employees the tools to get tested to reduce the likelihood of bringing the virus to work.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19.
- Guidance for cleaning and disinfecting.
- Stronger Together Public Service Announcements (PSAs) will be used to provide useful information about staying healthy, connected, and safe. Various webinars and zoom staff meetings providing training on ventilation, school reopening, and safe procedures will be offered to staff.

Appendix D: COVID-19 Training Roster may be used to document this training, as well as electronic lists from virtual meetings.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure who are symptomatic and direct them to test for COVID-19 from the workplace in accordance with Cal/OSHA guidelines and/or applicable California Department of Public Health (CDPH) rules.
- Providing employees at the time of exclusion with information on available benefits. Employees should contact Human Resources/ Employment Services to discuss leave options and to obtain the appropriate form.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report information about COVID-19 cases at our workplace to SCCOE's workers' compensation claims administrator, pursuant to Labor Code section 3212.88.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.

- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- 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.

Return-to-Work Criteria

<p>Requirements apply to all employees, regardless of vaccination status, previous infection, or lack of symptoms.</p>	<ul style="list-style-type: none"> • Employees who test positive for COVID-19 must be excluded from the workplace for at least 5 days after start of symptoms or after date of first positive test if no symptoms. • Isolation can end and employees may return to the workplace after day 5 if symptoms are not present or are mild and resolving; AND the employee is fever-free for 24 hours without the use of a fever-reducing medication. • If an employee has a fever, isolation must continue and the employee may not return to work until 24 hours after the fever resolves. • If an employee's symptoms other than fever are not improving, they may not return to work until their symptoms are resolving or until after day 10. • Employees must wear face coverings around others for a total of 10 days. Please refer to the section in this FAQ on face coverings for additional face covering requirements.
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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.

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

If the local department of health has identified the facility as an outbreak or there are 10 or more COVID-19 cases in an exposed workplace within a 14-day period, the County Office will enact enhanced procedures. These policies will apply until there are no new COVID-19 cases detected in a workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will have access to testing immediately and on or after day 5. 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.
 - COVID-19 testing will be available at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure and are symptomatic are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, per CAL OSHA requirements. Exposed staff are required to test within 3-5 days and wear a mask around others for 10 days, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

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

The investigation and review will be documented and include:

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

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

Notifications to the local health department

- Immediately, but no longer than 24 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

Additional Consideration #2

Major COVID-19 Outbreaks

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

COVID-19 testing

We will provide Over the Counter (OTC) tests, twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we 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 with the ventilation system, we will use filters with the highest compatible filtering efficiency. 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 implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.