

Klamath-Trinity Joint Unified School District COVID-19 Prevention Program (CPP)

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace.

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to the Emergency Temporary Standards in place for COVID-19 (California Code of Regulations (CCR), Title 8, section [3205\(c\)](#)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - [3205, COVID-19 Prevention](#)
 - [3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks](#)
 - [3205.2, Major COVID-19 Outbreaks](#)
 - [3205.3, Prevention in Employer-Provided Housing](#)
 - [3205.4, COVID-19 Prevention in Employer-Provided Transportation](#)
 - The four [Additional Considerations](#) provided at the end of this program to see if they are applicable to your workplace.
- Additional guidance and resources are available at www.dir.ca.gov/dosh/coronavirus/



May 2022

Authority and Responsibility

The Superintendent has overall authority and responsibility for implementing the provisions of this CPP in our workplace and for implementing procedures that are directed from the Board of Trustees through Board Policies and Administrative Regulations. Additionally, site administrators, 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.

July 08, 2022

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Document the vaccination status of our employees which is maintained as a confidential record.
- Develop and implement COVID-19 policies and procedures to respond effectively and immediately to individuals who are a positive COVID-19 case to prevent or reduce the risk of transmission using the Klamath-Trinity Joint Unified School District COVID-19 Testing and Notification Protocol (Appendix B).
- 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 including:
 - [Cal/OSHA-CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environment.](#)
 - [CDPH Face Covering Requirements.](#)
 - [CDPH Isolation and Quarantine Guidance.](#)
 - [Applicable CDPH Employees & Workplaces Guidance.](#)
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls, including maximizing the effectiveness of ventilation and air filtration.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards. Employees are encouraged report their comments, concerns, and suggestions regarding the identification and evaluation of COVID-19 hazards to their direct supervisor, who will in turn report to either the Director of MTO, the SRO, Wellness System Coordinator, or the Superintendent, if unable to resolve the concern. CSEA and KTTA Union representation may be included in meetings mitigating COVID-19 hazards.

Employee Screening

Before employees report to work, they are encouraged to complete an informal self-health assessment at home. The self-assessment includes taking their temperature and conducting a COVID-19 symptoms review. If the employee has a temperature or has any COVID-19 symptoms (e.g., fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea), they are not permitted to report to work that day and are required to notify the site supervisor.

If an employee becomes ill at work with COVID-19 symptoms, employees should notify their direct supervisor immediately and contact their medical provider if there are health concerns. KTJUSD adheres to the protocols developed by California Department of Public Health (CDPH).

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices and/or procedures will be evaluated by the District Safety Advisory Team. Recommendations for COVID-19 hazard corrections will be

shared with site administrators, managers, and supervisors so corrections can be made, where practicable.

Control of COVID-19 Hazards

Face Coverings

Face coverings are provided to any employee who requests them, regardless of the vaccination status.

Physical Distancing

The Emergency Temporary Standards (ETS) eliminated physical distancing and physical partition requirements, except during outbreaks. It also eliminated its prior cleaning and disinfecting procedures, except as provided for in the CPP.

Engineering Controls

For indoor locations, we identify and evaluate how to maximize, to the extent feasible, ventilation with outdoor air using the highest filtration efficiency compatible with our existing ventilation system, and whether the use of portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission.

Ventilation

- All the new facilities are equipped with HVAC Systems designed to operate with continuous fan when the building is occupied.
- The units have MERV 8 and above filters installed, which are efficient at capturing airborne viruses.
- All the units bring in the minimum amount of outside air as required by the State of California. Most of the rooms get around 200 CFM of outside air brought into them.
- KTJUSD MTO Staff will change all filters routinely every 3 months or per manufacturer recommendations.
- Workspaces/classrooms do not contain central HVAC systems with the capabilities of air filtration are provided portable HEPA filtration system.
- When weather conditions allow, outdoor air flow will be increased by opening windows and doors.

Cleaning and Disinfecting

- At a minimum, KTJUSD will follow CDPH recommendations: When no people with confirmed or suspected COVID-19 are known to have been in a space, cleaning once a day is usually enough to sufficiently remove virus that may be on surfaces and help maintain a healthy facility.
- Staff will implement daily cleaning of their workspace.
- High-touch surfaces that require extra attention include, but are not limited to, door handles, counters, computers, phones, copy machines etc.
- Staff will be provided with FDS/EPA/Cal OSHA approved cleaning products for their work area.

- Cleaning products are not to be used while children are present and are stored in locked areas.
- Janitorial staff will conduct their normal to increased daily cleaning of district facilities, using FDS, EP, CAL OSHA approved cleaning products for their work areas.
- District issued gloves, face shields, and gowns are made available to use during cleaning procedures.
- Should we have a positive COVID-19 case in our workplace, KTJUSD will follow CDPH guidance: If a facility has had a sick person with COVID-19 within the last 24 hours, clean AND disinfect the spaces occupied by that person during that time.

Hand Sanitizing

District employees are encouraged to follow the below hand hygiene protocols:

- Practice good hand hygiene.
- Wash your hands or use hand sanitizer upon entering district facilities.
- Wash your hands after touching your face, sneezing, coughing, and touching surfaces.
- Wash your hands every two hours on a regular schedule for 20 seconds.
- Frequent use of hand sanitizers is recommended.
- Hand sanitizer of at least 60% alcohol is provided by the district in all workspaces.
- District bathrooms contain soap, water, and paper towels.

Personal Protective Equipment (PPE) used to control exposure to COVID-19

- The district will provide PPE, as requested, for all staff. PPE will not be shared. The district can provide PPE equipment such as masks, gloves, gowns, face shields, and/or plexiglass shields.
- We evaluate the need for PPE as required by section 3380, and provide and ensure use, as needed.
- Upon request, we provide appropriate PPE for voluntary use by all employee, regardless of the vaccination status.
- We provide and ensure the use of respirators in compliance with section 5144 when deemed necessary by Cal/OSHA.
- We also provide and ensure the use of eye and respiratory protection when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Testing of Employees

Employees are required to provide proof of vaccination or weekly testing to the Administrative Assistant for Personnel Services. KTJUSD provides COVID-19 testing on a limited basis at school sites and at the District's Wellness Center in Hoopa.

Investigating and Responding to COVID-19 Cases

- After a close contact or a positive test, employees follow the current CDPH isolation and quarantine guidelines.
- The district will conduct site or department notification, as well as collaborate with Humboldt County Public Health and local Tribal authorities.
- Employees who are COVID-19 positive will be subject to the district COVID-19 Testing Protocol (Appendix B).

Exclusion of COVID-19 Cases and Close Contact Employees

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

- Ensuring that COVID-19 cases are excluded from the workplace until they have met the Public Health criteria.
- Employees will be provided with leave described in their Collective Bargaining Agreement and Education Code.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever the COVID-19 exposure is determined to be work-related. Employer provided leave as agreed to in the Collective Bargaining Agreements or Worker's Compensation Benefits.
- Providing employees at the time of exclusion with information on available benefits. Contact Nena Hames (nhames@ktjUSD.k12.ca.us or Extension 1006).

Employee Return to Work Criteria:

- Positive COVID-19 cases, regardless of vaccination status or previous infection and who do not develop symptoms or symptoms resolving, cannot return to work until at least five days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test; and
- A negative COVID-19 test from a specimen collected on the fifth day or later is obtained; or at least 10 days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test.
- COVID-19 tests must be collected and recorded by a certified COVID-19 testing facility including any KTJUSD School Site, the district's Wellness Center, or a medical facility.
- The return-to-work requirements for positive COVID-19 cases who do or do not develop symptoms apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
- If an order to isolate, quarantine, or exclude an employee is issued by CDPH, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases and outbreaks in our workplace to the local public health department whenever required by law, and to provide any related information requested by the local health department.
- 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 positive cases.
- Humboldt County Public Health and Tribal Governance Public Health Officers are notified, when applicable.

System for Communicating

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

- Employees will report COVID-19 symptoms and possible hazards to their direct supervisor verbally or in writing. Employees' personal health information is kept confidential and reported only to the District Superintendent and Administrative Assistant for Personnel.
- Employees may request testing through their supervisor, Wellness System Coordinator or by contacting the Administrative Assistant for Personnel.
- Supervisors report concerns related to COVID-19 hazards to the MTO Director, School Resource Officer, Wellness System Coordinator, or the Superintendent.
- Employees can report COVID-19 symptoms and hazards without fear of reprisal.
- Policies and procedures are in place for accommodating employees with medical or other conditions which put them at increased risk of severe COVID-19 illness.

Training and Instruction

The MTO Staff and/or employees have been provided with training on COVID-19, COVID-19 cleaning procedures, and COVID-19 disinfecting supplies. Cleaning product Safety Data Sheets have been provided to district employees. Additionally, all staff are trained annually in:

- Keenan IPM Integrated Pest Management
- Blood Borne Pathogen Training

New employee will be offered COVID trainings at the beginning of the 2022-2023 school year.

Appendix B: COVID-19 Testing and Notification Protocol

STUDENT TESTS POSITIVE

WHO	ACTION
Wellness System Coordinator	Notify the site administrator of positive test result by telephone.
Wellness System Coordinator	Notify parent/guardian of positive test result by telephone and ensure the automated Primary Health notification was sent.
Principal or Designee	Isolate student and arrange for parent/guardian pick-up. Encourage self-isolation at home. <ul style="list-style-type: none"> The student may return to school after day 5 if no symptoms are present <u>and</u> a negative COVID-19 test result is collected and recorded by a certified COVID-19 testing facility including any KTJUSD School Site, the district's Wellness Center, or medical facility.
Principal or Designee and Wellness System Coordinator	Notify Human Resources by 4 pm with names of students who tested positive that day and/or confirm there were no positive cases at your site.
Human Resources	Send a daily report to the Humboldt County Public Health Officer.
Principal or Designee	<u>Group Contact Notification:</u> Site/Department/Classroom <ul style="list-style-type: none"> Complete Parent Square notification immediately for those in the same indoor shared space for >15 minutes with the confirmed case, regardless of the vaccination status (See Exposure Sample Letters to Parents) Encourage testing at least once on day 3 – 5 after exposure.
Principal or Designee	Elementary Schools must notify the ASES Director of the positive student so a determination can be made about his/her ASES enrollment/attendance.
ASES Director	ASES Program Director will notify families in shared indoor space of the positive student via Parent Square. Exposure Sample Letters to Parents
Principal or Designee	Notify MTO Administrator about the classroom(s) that were occupied by the positive student for disinfecting and to determine if the student rode the school bus.
MTO Administrator	MTO Administrator will notify the site administrator of the shared space on the bus and update relevant transportation of temporary change in bus route.

EMPLOYEE TESTS POSITIVE

WHO	ACTION
Wellness System Coordinator	Notify the employee of the positive test result by telephone, the importance of leaving work immediately, and ensure the automated Primary Health notification was sent.
Wellness System Coordinator	Notify Human Resources about the positive test result by telephone.
Wellness System Coordinator	Notify the direct supervisor about the positive test result by telephone and the exclusion from work.
Human Resources	Send confirmation email to supervisor that employee is excluded from work.
Human Resources	Encourage self-isolation at home. The employee may return to work after day 5 if no symptoms are present <u>and</u> a negative COVID-19 test result is collected and recorded by a certified COVID-19 testing facility including any KTJUSD School Site, the district's Wellness Center, or medical facility.
Human Resources	<u>GROUP CONTACT NOTIFICATION:</u> Notify employees, union representatives and other workers of a workplace COVID-19 exposure within one business day.
Human Resources	Send daily list to Humboldt County Public Health Officer.
Human Resources	Notify MTO about workspace occupied by the positive employee.

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This addendum will need to be added to your CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a 14-day period. Reference section 3205.1 for details.]

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

COVID-19 Testing

- We provide COVID-19 testing at no cost to all employees, during paid time, in our exposed group except for:
 - Employees who were not present during 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 an exposed group are immediately tested and then advised to retest at least once on day 3 – 5. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we continue to provide COVID-19 testing once a week of employees in the exposed group who remain at the workplace, 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 provide additional testing when deemed necessary by Cal/OSHA.

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

1. We give notice to employees in the exposed group of their right to request PPE (such as gloves, goggles, and face shields) or a respirator for voluntary use regardless of the vaccination status.
2. 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.

COVID-19 Investigation, Review, and Hazard Correction

We 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 are documented and includes:

- Investigation of new or unabated COVID-19 hazards including:
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
- Updating the review:
 - Every thirty days that an 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 consider:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air flow supply when working indoors (e.g., opening doors or windows).
- Improving air filtration.
- Increasing physical distancing as much as feasible.
- Requiring respiratory protection in compliance with section 5144.

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, 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, if so, implement their use to the degree feasible.

Additional Consideration #2

Major COVID-19 Outbreaks

[This addendum will need to be added to your CPP should 20 or more employee COVID-19 cases in an exposed group visit your workplace during the infectious period within a 30-day period. Reference section [3205.2](#) for details.]

This addendum will stay in effect until there are fewer than three COVID-19 cases detected in our exposed group for a 14-day period.

We continue to comply with the Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, except that the COVID-19 testing, regardless of vaccination status, is made available to all employees in the exposed group twice a week, or more frequently if recommended by the local health department.

In addition to complying with our CPP and Multiple COVID-19 Infections and COVID-19 Outbreaks addendum, we also:

- Provide employees in the exposed group with respirators for voluntary use in compliance with section 5144(c)(2) and determine the need for a respiratory protection program or changes to an existing respiratory protection program under section 5144 to address COVID-19 hazards.
- Separate by six feet (except where we can demonstrate that six feet of separation is not feasible and there is momentary exposure while persons are in movement) any employees in the exposed group who are not wearing respirators required by us and used in compliance with section 5144. When it is not feasible to maintain a distance of at least six feet, individuals are as far apart as feasible.
- Install cleanable solid partitions that effectively reduce transmission between the employee and other persons at workstations where an employee in the exposed group is assigned to work for an extended period, such as cash registers, desks, and production line stations, and where the physical distancing requirement (described above) is not always maintained.
- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by Cal/OSHA.