



# Inland Leaders Charter School (ILCS)

## COVID-19 Prevention Program (CPP)

The COVID-19 Prevention Plan (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur at Inland Leaders Charter School (ILCS). This plan is subject to local county and state level requirements in regards to mitigating the spread of COVID-19. This plan is intended to follow the California Department of Public Health guidelines for K-12 schools and Cal-OSHA regulations.

**Date: 1/27/21; Amended 8/2/21; 8/31/21; 3/14/22**

### Authority and Responsibility

The **Executive Director** has overall authority and responsibility for implementing the provisions of this CPP in the workplace. In addition, all principals, 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

ILCS will implement the following in the workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- 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.
- 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 our COVID-19 policies and procedures.
- Students and adults are recommended to conduct health screenings through ParentSquare; here they will indicate if they have had possible COVID-19 exposures and/or are exhibiting symptoms prior to coming to school each day; of course, students who have either an exposure or symptoms are told to stay home until their case may be reviewed by the school nurse. Once the case is reviewed by the nurse, a plan for return is developed.
- Students' temperatures may be taken every day upon entering campus; if a student presents with a fever of 100.4 or greater, the student is isolated and excused from school. Students exhibiting symptoms after arriving at school are taken to an isolation area where the student will be further evaluated; if needed, parents will be called for pickup. Further contact tracing and possible cohort quarantine and closure will be considered.
- Staff exhibiting symptoms are moved into isolation and will be evaluated by school nurse or health staff; if determined to be a risk, the staff member will be excused from work and provided information for testing if they choose to do so.

## **Employee Participation**

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by promptly reporting any COVID related hazards to their immediate supervisor.

## **Employee Screening**

Staff members are recommended to self-screen and complete daily temperature checks prior to coming to work. If staff members are experiencing symptoms, they will check in with the school nurse or other designated employee for further direction.

## **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:

School administration at ILCS will perform spot inspections looking for unhealthy work conditions or practices by staff, students, parents and subcontractors visiting sites. Infractions to any safe working conditions, practices and procedures observed and/or noted in the inspection will be addressed immediately. Hazards particularly assessed will include proper and safe practices when it comes to social distancing, use of PPE, cleanliness/sanitization protocols, and proper supply and stocking of washing and sanitation supplies. The severity of the hazard will always be assessed and the correction time frames will be assigned accordingly. Individuals will be identified as responsible for timely correction and administration will follow-up to ensure the correction occurs in an ample and timely manner.

Employees and families will be notified in the event that there is a potential COVID-19 exposure. Steps will be taken to insure an in-depth contact tracing procedure takes place that identifies all potential exposures. Furthermore, a thorough disinfection for all areas and surfaces exposed will take place. Staff, cohorts and/or individuals may be quarantined until deemed safe.

## **Physical Distancing**

Where possible, ILCS will implement the social distancing recommendations of the California Department of Public Health and Local County Public Health Department.

- Visual cues such as signs and floor markings to indicate where staff and students should be located during their path of travel or while waiting to perform various tasks.
- Staggered recess, PE, and break times have been implemented to reduce potential exposure.
- Adjusted work processes or procedures, such as hybrid learning via Zoom platform allowing students to learn remotely from home as needed.
- Additional furniture has been purchased and existing furniture has been reconfigured to allow for physical distancing practices.
- Work meetings may take place via Zoom platform.
- Additional lunch eating areas created to "spread" students on the campus during lunch.

## **Face Coverings**

ILCS will follow the current face covering guidance published by the CDPH and local county public health department. Although staff and students will typically supply their own face coverings, additional face coverings for adults and children will be available at the front gate or in the office. Classrooms will have additional masks available as well. In addition, students may have temperature checks performed on a daily basis prior to school entry, along with a daily health screening form completed by a parent. Stricter quarantine and testing protocols may also apply to students without masks in the event of exposure to COVID-19.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least three feet apart and outside air supply to the area.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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.
- While outdoors

### **Enforcement of Face Covering Mandates**

In the event, masks are not mandated by the state authorities, ILCS will allow for a “mask recommended” policy as determined by state and county agencies. ILCS will enforce face covering mandates when required by the state and county health department. Students and staff may provide a written medical exemption for cloth face coverings to allow for an alternative face shield approved by a physician as allowed by CDPH. Students may be checked for masks prior to entering class in the morning. The following steps describe the process for enforcing the mask mandate in detail.

#### Students:

*Step 1:* Students without a face covering will be reminded to wear their face covering and provided a face covering in the event the student requests a face covering.

Students who refuse to follow public health orders/mandates may be excluded from school. ILCS may enact its charter school right to disenroll students from school as allowed by Education Code 47605 in the event a student does not follow a public health order/mandate.

#### Staff:

Staff will be reminded of mask requirements through written and verbal communications. Staff may be excluded from work if required by CAL-OSHA or the public health department.

#### Volunteers/Visitors

Volunteers and visitors will be provided with a mask when requested. Volunteers will need to adhere to the state mandate/orders regarding health requirements on campus.

### **Cleaning and Disinfecting**

ILCS implements the following cleaning and disinfection measures for frequently touched surfaces based on guidance from CDPH. ILCS recognizes the CSC guidance in regards to the over-use of disinfectant products and the need for more regular cleaning to limit exposure to harmful materials.

- Desks, chairs, tables, and other common touching surfaces (door handles, sink faucets) are cleaned weekly.
- Electrostatic cleaning sprayers are used when outbreaks occur for desks, chairs, common touch points and countertops.
- Cleaning supplies are frequently monitored to ensure ample product is available at all times.
- Proper PPE for cleaning/disinfecting will be provided for staff.
- All employees have been trained in the proper use of disinfectants through the CA Department of Pesticide Regulation.
- Plans, routines and schedules have been developed to maximize sanitation and cleanliness efforts.
- Cleaning and disinfecting kits have been placed in all classrooms and offices.
- All playground equipment and eating areas will be cleaned and disinfected periodically.

Should ILCS have a COVID-19 outbreak in the workplace the following procedures will be implemented:

- Areas of exposure will be identified.
- Thorough contact tracing from guidance of the county health department.
- Trained custodial staff will conduct intensive cleaning and disinfecting of all surfaces.
- Area may remain closed for an extended period of time.
- Class or cohort closure for distance learning will be considered.
- Additional quarantines for other staff and students who had exposure to the individual may occur.
- Immediate report to the county public health department for further guidance

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

PPE must not be shared at any time, e.g., gloves, goggles 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 utilizing cleaning and disinfecting products provided. All employees received training for safe and effective practices for disinfection and cleaning.

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures, we:

- Installed handwashing stations to accommodate a greater number of students and staff.
- Hand washing times embedded in the daily schedule for all students and staff.
- Stations checked daily for ample stock supply such as soap and paper towels.
- All staff are encouraged to handwash for at least 20 seconds at a time.
- Hand sanitizing stations have been placed throughout the campus.

### **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 when the physical distancing requirements are not feasible or maintained.

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.

## **Investigating and Responding to COVID-19 Cases**

This will be accomplished by using the **Staff COVID Contact Tracing Spreadsheet**.

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

- Notified within 24 hours of possible exposure.
- Offered COVID-19 testing at no cost during their working hours.
- Allowed to work from home if not sick and able to work remotely.
- Information on benefits, eligibility and accommodation for COVID-19 cases will be provided.
- Plans will be developed for safe return.

## **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 that it includes the following information:

- Employees will report COVID-19 symptoms and possible hazards to their immediate supervisor or school nurse. This will take place via email or phone call.
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies will accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees will be encouraged to receive a COVID-19 test; they will further be given guidance on nearby locations.
- In the event ILCS is required to provide testing because of a workplace exposure or outbreak, we 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. Employees will not be responsible for testing fees.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures will be sent out on an as needed basis through bulletins and/or emails.
- Provide continued information in regards to vaccinations.

## **Training and Instruction**

ILCS will provide effective training and instruction that includes:

- 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 physical distancing and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel indoors, so physical distancing 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 symptoms.
- Methods of handling a student who is or is possibly infected with the virus including proper use of PPE.
- Inland Leaders will have rosters available for all mandatory training regarding COVID-19 information and safety.

## **Exclusion of Staff COVID-19 Cases**

When ILCS has a COVID-19 case in its workplace, transmission will be minimized by:

- Ensuring that COVID-19 cases or exposures are excluded from the workplace until return-to-work requirements are met as outlined by the health department and Cal-OSHA.
- Providing employees at the time of exclusion with information on available benefits as required by law and OSHA regulations.

## Quarantine process

Quarantine protocols follow the CDC and Cal-OSHA guidelines listed on their website.

<https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html>

[https://www.dir.ca.gov/dosh/dosh\\_publications/Isolation-and-Quarantine-fs.pdf](https://www.dir.ca.gov/dosh/dosh_publications/Isolation-and-Quarantine-fs.pdf)

## TESTING

ILCS will evaluate testing for staff, students and volunteers based on OSHA requirements and state recommendations. ILCS may continue operating with on-site COVID testing on a weekly basis.

## 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. This can be found at [https://dphsbcountry.co1.qualtrics.com/jfe/form/SV\\_1KPbjRQPDXXOjDD](https://dphsbcountry.co1.qualtrics.com/jfe/form/SV_1KPbjRQPDXXOjDD)
- 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.
- 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.
- Utilize internal Staff COVID Contact Tracing Spreadsheet.
- Monitor and maintain Student Health Screening Form data.

## Return-to-Work Criteria.

ILCS will follow the Cal-OSHA requirements for Return to Work Criteria.

\*This safety plan may need to be amended based on new guidance from the CDPH or local county public health department.

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## Appendix B: COVID-19 Inspections

Date: [            ]

Name of person conducting the inspection: [            ]

Work location/s evaluated: [            ]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
Physical distancing (Staff)			
Physical distancing (Students)			
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			
Signs Posted			
Barriers and safety zones adequately marked			
<b>PPE</b> (not shared, available and being worn)			
Face coverings worn properly			
Gloves			
Face shields/goggles			
Respiratory protection			



## **Appendix C: Investigating COVID-19 Cases**

ILCS will investigate and track all COVID-19 related cases through its Staff and Student COVID Contact Tracing Spreadsheets 2020-2021. 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.

### **Information Collected in the Spreadsheet for Investigation will Include:**

- **Employee/Student Name**
- **Date**
- **Date of Symptoms**
- **Locations Occupied**
- **Testing Information/Outcome**
- **Exposure Date**
- **Date of Return to Work/School**
- **Others in Contact**
- **Documentation of Alerting Other Employees for Potential Exposure**
- **Notes to Investigation and Actions Taken**

## **Additional Consideration #1**

### **Multiple COVID-19 Infections and 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 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 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, we 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 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 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**

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.
- [describe other applicable controls].

**Notifications to the local health department**

- Immediately, but no longer than 48 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 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**.

**All sections of this plan will be subject to the California Department of Public Health and California Occupational Safety and Health Administration requirements.**