



## **COVID-19 Prevention Program (CPP) for Black Pine Circle School**

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

**Original Date: September 20, 2021** *(updated 3-23-2022)*

### **Authority and Responsibility**

Black Pine Circle School's Head of School, John Carlstroem, has overall authority and responsibility for implementing the provisions of this CPP in our school and 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:

- 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, Berkeley Public Health, and Alameda County Department of Public Health 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.

### **Employee participation**

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: reporting any potential hazards that are seen in the school and/or workplace to their immediate supervisor, chief financial and operating officer, and/or head of school.

## **Employee screening**

***Black Pine Circle School required that all employees be fully vaccinated for COVID-19 by July 1, 2021, or by their start date if any employee was hired after that time.***

All staff who are working on site in any of our campuses and/or buildings (lower school, upper school, and administrative buildings) are required to self-assess daily for any symptoms of COVID-19 prior to coming to work. Any employee who is exhibiting symptom(s) of COVID-19 and/or has a fever is instructed to stay home and wait for further instructions from their supervisor and/or the director of HR for return to work protocols.

In addition, all staff are required to participate in surveillance testing at a frequency determined by the head of school.

## **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 severity of the hazard will be assessed by the head of school, chief financial and operating officer, and campus health coordinator.

Based on the severity of the hazard, a time frame for correcting the hazard will be assigned, and the individual responsible for correction will be identified.

The individual that is responsible for the correction will complete it within the time frame identified, and report the completion of the correction of the hazard to the head of school, chief financial and operating officer, and campus health coordinator.

The head of school, chief financial and operating officer, and campus health coordinator will follow up to ensure the correction was carried out and identify next steps if applicable.

## **Control of COVID-19 Hazards**

### **Face Coverings**

Black Pine Circle provides disposable face coverings for all students and staff. Masks are no longer required; they are optional, but “strongly recommended”. If students or staff become close contacts to a confirmed positive COVID-19 case, or they are released from isolation early (after Day 5, but before Day 10), it is strongly recommended that they wear a mask at *all* times, indoors and outdoors, except when eating or drinking.

### **New BPC Masking Guidance as of 3/21/22:**

- Masking choices are up to individual families/staff.
- Students/staff can arrive at school masked or unmasked.
- Students/staff are welcome to remove a mask or put on a mask at any time during the school day.
- We will have disposable masks available for students/staff on each campus.
- There is no distinction in the CDPH and BPH guidance regarding masking choices for vaccinated and unvaccinated students.
- BPC is still asking those students/staff participating in high-exertion activities indoors (volleyball, singing, band, etc.) to wear a mask.

## **Engineering controls**

We implement the following ventilation measures for indoor spaces:

- Running our HVAC system that is equipped with Merv-13 filters.
- Opening doors and windows to increase airflow in classrooms and offices.
- In some spaces, using air circulating HEPA/UV light air purifiers in addition to the HVAC system.

## **Cleaning and disinfecting**

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

- Once a day sanitization of all surfaces.
- Once a week disinfecting of all surfaces through our outside janitorial service, Wessne.
- Employees are equipped with personal cleaning supplies to disinfect their personal workspace when needed - e.g. hand-sanitizer, sanitizing wipes/spray
- Frequent handwashing and/or hand-sanitizing procedures before and after touching frequently touched or shared surfaces/supplies

Should we have a COVID-19 case in our school and workplace, we will implement the following procedures: Cleaning and disinfecting of the area(s), classroom, and/or workspace where the positive individual spent time. A licensed outside cleaning service, such as Wessne, would be responsible for cleaning and disinfecting the areas, overseen by our facilities manager. Any materials and equipment used by the positive individual would be cleaned and disinfected per guidelines.

## **Hand hygiene**

In order to implement effective hand sanitizing procedures, we:

- Evaluated our current handwashing and hand-sanitizing procedures.
- Provided additional handwashing and hand-sanitizing materials on the lower school and upper school campuses.
- Provided employees and students with an effective hand sanitizer that is easily accessible to their area.
- Encouraged employees and students to wash their hands for at least 20 seconds each time.
- Equipped every teacher that is working with students with a personal hygiene kit that contains hand sanitizer for their personal use.

## **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.

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

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

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

- Offered COVID-19 testing at no cost to the employee during their working hours.

## **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:

- Who employees should report COVID-19 symptoms and possible hazards to;
- That employees can report symptoms and hazards without fear of reprisal;
- Our procedures and/or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness and/or who are protected under the ADA;
- Where testing is not required, how employees can access COVID-19 testing in the workplace and in the community.

Outside of the scheduled testing offered through the school, employees are provided information to access free testing through city/county resources.

- In the event we are required to provide additional 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.
- We provide 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.

## **Training and Instruction**

We provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards and to mitigate risks when working on site;
- Information regarding COVID-19 related benefits to which the employee may be entitled to under federal, state, or local laws;
- The importance of combining physical distancing with face coverings and other hygiene measures;
- The fact that physical distancing must be combined with other controls, such as face coverings and hand hygiene, in order to reduce the risk of transmission of COVID-19;
- The importance of frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing is not feasible;
- The proper use of face coverings and that the primary purpose of face coverings is to protect other individuals from the wearer of the face covering;
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air;
- COVID-19 symptoms, the importance of participating in surveillance testing when community spread is high, and not coming to work if the employee has COVID-19 symptoms.

## **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 unvaccinated employees and/or students with COVID-19 exposure from the workplace per CDPH guidelines;
- Providing employees at the time of exclusion with information on available benefits.

## 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 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 school and workplace to employees 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 or as otherwise required by law, with personal identifying information removed.

## Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 degrees F or higher has resolved without the use of fever-reducing medications;
  - COVID-19 symptoms have resolved;
  - If they obtain a negative antigen test result, observed by their employer or healthcare provider.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 5 days have passed since the date of specimen collection of their first positive COVID-19 test, and if they obtain a negative antigen test result, observed by their employer or healthcare provider.
- A negative COVID-19 test will not be required for an employee to return to work upon completion of 10 days of appropriate quarantine/isolation precautions.

John Carlstroem, Head of School

{Insert John's signature and date here}

## 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, break or eating areas, check-in areas, waiting areas, and classrooms.

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, students and/or families, 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


## Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Outdoor tents/canopies			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Hand sanitizing stations (adequate numbers and supplies)			
Social distancing markers and one-way paths			
Sanitizing wipes available with each classroom			
<b>PPE</b>			



Face coverings (disposable and cloth)			
Gloves			
Face shields			
Gowns (if 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 provided through the school will be conducted 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.

**Date:**

**Name of person conducting the investigation:**

<p><b>Employee (or non-employee*) name:</b></p>		<p><b>Occupation (if non-employee, why they were in the workplace):</b></p>	
<p><b>Location where employee worked (or non-employee was present in the workplace):</b></p>		<p><b>Date investigation was initiated:</b></p>	
<p><b>Was COVID-19 test offered?</b></p>		<p><b>Name(s) of staff involved in the investigation:</b></p>	
<p><b>Date and time the COVID-19 case was last present in the workplace:</b></p>		<p><b>Date of the positive or negative test and/or diagnosis:</b></p>	
<p><b>Date the case first had one or more COVID-19 symptoms:</b></p>		<p><b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b></p>	

<p style="text-align: center;"><b>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</b></p>	
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<p><b>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:</b></p>		
<p><b>All employees who may have had COVID-19 exposure and their authorized representatives.</b></p>	<p><b>Date:</b></p>	
	<p><b>Names of employees that were notified:</b></p>	
<p><b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b></p>	<p><b>Date:</b></p>	
	<p><b>Names of individuals that were notified:</b></p>	

<p><b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b></p>		<p><b>What could be done to reduce exposure to COVID-19?</b></p>	
<p><b>Was local health department notified?</b></p>		<p><b>Date:</b></p>	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.