

**COVID-19 Prevention Program (CPP)**

**PUBLIC SAFETY ACADEMY OF SAN BERNARDINO**

Board Approved on March 11, 2021

**Introduction:**

In March 2020, the traditional educational environment was disrupted due to the onset and spread of the COVID-19 virus in the United States, and subsequent classification of its spread as a pandemic, on a worldwide scale. This has necessitated a modification to the education model during the last quarter of instruction during the 2019-2020 academic year, continuing through the 2020-2021 school year. This CPP will address the steps taken for safe reopening as we transition from online learning to in-person learning.

The Public Safety Academy of San Bernardino has designated Mr. Steven Filson, the Director of Security and Cadet Services as the staff liaison in dealing with the CPP. Mr. Filson will be the Academy’s immediate point of contact with the San Bernardino City Unified School District and the San Bernardino County Health Department. In doing so, the Academy will establish and continue communication with local and State authorities to determine current disease levels and control measures in our immediate and surrounding community. The Academy will follow County Health Department directives as they are issued.

**Identification and Evaluation of 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, 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.

### Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by alerting administration of any potential hazards in the workplace. Employees shall express any concerns to administration immediately as they arise. Employees are encouraged to maintain heightened awareness of any potential hazards in their specific work area and surrounding areas on campus. Employees are encouraged to take responsibility to remind and direct students to wear their mask properly at all times, maintain their distance from one another, frequent handwashing and sanitation, etc.

### Employee screening

* We screen our employees by requiring a temperature check upon entering the building—*anyone with a reading above 100.4F will not be permitted to remain on the premises.* Additionally, PSA requires completion of a symptoms questionnaire prior to the employee coming on campus. This questionnaire is submitted via Parent Square.

## 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:

Any hazards listed on the Appendix A table shall be corrected prior to reopening. Inspections for any further hazards will be ongoing and corrections of potential hazards will be made immediately. If the potential hazard is not able to be corrected immediately, no persons shall be exposed to that area/areas until issue is corrected.

## Control of COVID-19 Hazards

### Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

* + - Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements.
    - Reducing the number of persons in an area at one time, including visitors.
    - Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
    - Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

### Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

Face coverings have been purchased by the school in bulk and shall be provided to anyone who needs one. Any employees who encounter students or visitors who are not wearing a mask shall report to administration immediately. Anyone refusing to wear a mask may not be on the premises.

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

* When an employee is alone in a room.
* While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
* 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.
* Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee with a medical exemption for wearing a face covering may not be on campus as a matter of safety for others. Employees who have a medical reason to exempt them from wearing a face covering may be given the option to continue working from home until safe to return without a face covering requirement.

### Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals:

* Ensuring that face coverings are worn
* Ensuring that these interactions are for as minimal amount of time possible

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

Regularly changing filters;

Installation of UV-C Lamps (UVGI-Ultraviolet Germicidal Irradiation) inside supply side of HVAC systems, in order to purify the air by inactivating flyby viruses that travel within the airstream.

Leaving building and classroom doors propped open when weather permits. Security guard shall monitor building perimeter and alert any present danger that warrants closing doors/lockdown.

### Cleaning and disinfecting

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

All staff will be provided with ample amount of cleaning supplies. Students will wipe their own desks prior to switching classes.

Staff will be provided adequate time to ensure surfaces are cleaned before class dismissal to next period.

Custodians shall clean entire campus daily, paying special attention to surfaces and areas where exposure is greatest.

Quarterly campus deep cleaning, including power washing by city-approved, high grade power washer, carpet cleaning, stripping/waxing floors, etc.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: With regard to cleaning after a person who has been on campus tests positive for COVID, we will hire an outside company to conduct a thorough deep clean in all necessary areas.

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

PPE must not be shared, 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 employees and students between class periods for items such as desks, keyboards, etc. Teachers and students will be provided with ample cleaning supplies. Custodians will do a more thorough cleaning of surfaces after hours, daily.

### Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

* Evaluating handwashing facilities.
* Determining the need for additional facilities.
* Encouraging and allowing time for employee handwashing.
* Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
* Encouraging employees to wash their hands for at least 20 seconds each time.

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

* Offered COVID-19 testing through San Bernardino County, at no cost during their working hours.
* Employee must self-quarantine for 14 days.
* It is recommended they test again after the 14 days but not required.

## 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 should report COVID-19 symptoms and possible hazards to, administration as soon as they are made aware.
* Employees can report symptoms and hazards without fear of reprisal and all reports may remain confidential. All employee health matters are confidential.
* Procedures for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness are as follows: Any accommodations that can be made at the school’s cost. For example, if additional air filtration equipment must be present in the classroom or additional respiratory devices are needed, these will be provided by the school. If an employee cannot physically come in to work due to high-risk conditions, they may be permitted to work from home if all job duties may reasonably be completed from home, even after campus is reopened.
* In the event we are 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.
* 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 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 physical distancing of at least six feet and the importance of combining physical distancing with the 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 symptoms.

**Appendix D: COVID-19 Training Roster** will be used to document this training.

## 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 from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
* Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever we’ve demonstrated that the COVID-19 exposure is work related. This will be accomplished by allowing the employee to use COVID relief funds *if available* if personal time off hours have been exhausted. If COVID funding or PTO hours are unavailable, PSA will make every effort to continue time off with all necessary accommodations made. Should extended leave be required, employees are entitled to FMLA and/or State Disability.
* 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 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.

## 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 or higher has resolved without the use of fever-reducing medications.
* COVID-19 symptoms have improved.
* At least 14 days have passed since COVID-19 symptoms first appeared.
* COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 14 days have passed since the date of specimen collection of their first positive COVID-19 test.
* A negative COVID-19 test will not be required for an employee to return to work.
* If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 14 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

Reviewed and Approved by Jennifer Stickel, Principal

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**APPENDIX A:** Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| **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** |
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## Appendix B: COVID-19 Inspections

Person conducting the evaluation: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Work location evaluated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| **Exposure Controls** | **Status** | **Person Assigned to Correct** | **Date Corrected** |
| **Engineering** |  |  |  |
| Barriers/partitions |  |  |  |
| Ventilation (amount of fresh air and  filtration maximized) |  |  |  |
| Additional room air filtration |  |  |  |
| **Administrative** |  |  |  |
| Physical distancing |  |  |  |
| Surface cleaning and disinfection  (frequently enough and adequate  supplies) |  |  |  |
| Hand washing facilities (adequate  numbers and supplies) |  |  |  |
| Disinfecting and hand sanitizing solutions being used according to manufacturer instructions |  |  |  |
| **PPE** (not shared, available and being worn) |  |  |  |
| Face coverings (cleaned sufficiently often) |  |  |  |
| Gloves |  |  |  |
| Face shields/goggles |  |  |  |

## 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.

Person conducting the evaluation: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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

| **Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:** | | | |
| --- | --- | --- | --- |
| **All employees who may have had COVID-19 exposure and their authorized representatives.** | **Date:** |  | |
| **Names of employees that were notified:** |  | |
| **Independent contractors and other employers present at the workplace during the high-risk exposure period.** | **Date:** |  | |
| **Names of individuals that were notified:** |  | |
| **What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?** |  | **What could be done to reduce exposure to COVID-19?** |  |
| **Was local health department notified?** |  | **Date:** |  |

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

## Appendix D: COVID-19 Training Roster

Person conducting the evaluation: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

| **Employee Name** | **Signature** |
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## Additional Consideration #1

## Multiple COVID-19 Infections and COVID-19 Outbreaks

In the event there are multiple cases and/or outbreak, 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 I**nvestigating 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.**