

COVID-19 Prevention Plan (CPP)

for Fullerton School District

Effective: January 29, 2021

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. This COVID-19 Prevention Plan (CPP) will be implemented through Fullerton School District as outlined in the District's Safe Reopening Plan, Injury and Illness Prevention Plan – COVID Addendum, and this COVID-19 Prevention Plan.

Supporting Documents Include:

[Fullerton School District – Reopening Plan](#)

[Employee Injury and Illness Prevention Plan - COVID-19 Addendum](#)

[COVID-19 School Guidance Checklist - January 2021](#)

I. Authority and Responsibility

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

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

II. Identification and Evaluation of COVID-19 Hazards

Fullerton School District 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.
- Utilize information obtained through contract tracing to update safety procedures.

III. Employee Participation

Fullerton School District employees and their authorized employees' representatives are encouraged and expected to participate in the identification and evaluation of COVID-19 hazards.

IV. Employee Screening

Fullerton School District will screen our employees by providing daily attestation of symptoms along with temperature screening as employees enter the workplace. Employees are encouraged to perform symptom screening prior to arriving to work each day. We will continue to monitor information on new symptoms or updates related to screening practices.

V. Correction of COVID-19 Hazards

Fullerton School District will immediately correct any and all work conditions that could possibly put an employee at risk for COVID-19. The severity of the hazard will be assessed and correction time frames assigned, accordingly.

- Once the condition has been identified, individuals will be assigned responsibility for correction to ensure a timely completion.
- Employees are encouraged to notify their direct Supervisor of the condition. If an employee would like to, they may notify the COVID-19 response team if they prefer to be anonymous using a dedicated email address: Covidresponse@myfsd.org

VI. Control of COVID-19 Hazards

Physical Distancing

Where possible, Fullerton School District ensures at least six feet of physical distancing at all times in our workplace by:

- Eliminating the need for workers to be in the workplace when feasible (e.g., telework or other remote work arrangements) when the employee is able to complete their job duties at no cost and no increased impact to other employees.
- Reducing the number of persons in an area at one time, including visitors.
- Providing visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggering arrival, departure, work, and break times when possible.
- Adjusting work processes or procedures 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

Fullerton School District will provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors 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. In addition, other workplace methods include:

- Instructing employees to remind both employees and visitors that face coverings will be required in all District Offices, Departments, and Schools.
- Posting signs at entrances informing both staff and public that facial coverings are required throughout the school sites and departments.

Face Coverings (continued)

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.
- For employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- For 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.
- When specific tasks, that cannot feasibly be performed with a face covering, and employees will be kept at least six feet apart.

Engineering controls

Fullerton School District implements the following measures for situations where we cannot maintain at least six feet between individuals:

- Provided solid partitions.
- Arranged and/or removed furniture to reduce occupancy

Fullerton School District maximized, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- Encouraging the opening of windows and exterior doors providing there is no safety or health risk related risks, including but not limited to poor air quality or other outdoor air irritants.
- Upgrading and maximizing central air filtration for Heating Ventilation and Air Conditioning (HVAC) systems by installing and maintaining filters with a Minimum Efficiency Reporting Value of at least 13 (MERV-13).
- Adjusting HVAC systems to provide the maximum intake of outdoor air.
- Making a good-faith effort to run the HVAC fan two hours before occupancy.
- Providing High Efficiency Particulate Air (HEPA) filters in school kitchens.

Cleaning and Disinfecting

Fullerton School District will implement the following cleaning and disinfection measures for frequently touched surfaces:

- Assign personnel and establish routine schedules to clean and disinfect common surfaces and objects in the workplace. This includes, but is not limited to, classroom technology devices, containers, counters, tables, desks, chairs, benches, door handles, knobs, drinking fountains, refrigerators, vending machines, portable restroom and bathroom surfaces, and trash cans.
- The process of disinfecting includes providing disinfecting products that are EPA approved for use against the virus that causes COVID-19 and following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety

Cleaning and Disinfecting (continued)

- requirements, Personal Protective Equipment (PPE), concentration, contact time).
- Ensuring adequate supplies and adequate time for it to be done properly.
- Inform the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection using a posted schedule indicating when the room was last cleaned.

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

- Temporarily close the general area where the infected employee worked until cleaning is completed.
- If possible, open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before cleaning and disinfecting.
- Conduct deep cleaning of the entire general area where the infected employee(s) worked or may have been, including but not limited to breakrooms, restrooms and travel areas.
- Use a cleaning agent approved for use by the Environmental Protection Agency (EPA) against the coronavirus and equip custodians with the proper personal protective equipment for COVID-19 cleaning and disinfection (i.e. disposable gown, gloves, eye protection, or masks, if required).

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 of common items, employees are instructed to clean in between use.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we have:

- Installed portable handwashing stations and approved sanitizer dispensers throughout the District and school sites.
- Posted health department reminders in all restrooms and lunch areas.
- Encouraged employees to wash their hands throughout the day.

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 have installed plexiglass shields in office spaces located where members of the public enter/or in areas of high foot traffic throughout the school sites/District offices. We have also made available these shields for special education staff.

We provide CDC approved face coverings for employees. In addition, N-95 masks are available upon request.

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. This may occur while working in classrooms with students with special needs.

VII. 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:

- Notified that there has been a positive case in the workplace using either a formal notification (email) and/or dashboard.
- Notified if they are identified as close contacts.
- Provided, at-no cost, testing during their working hours.
- Provided information from the public healthcare agency/District on how to keep themselves safe, quarantine, keep others in their home safe, and when to return to the workplace.

Employees will not be notified for suspected cases; only medically confirmed.

VIII. System for Communicating

Fullerton School District's goal is to ensure that we have effective two-way communication with our employees, in a format they can readily understand, and that it includes the following information:

- On how employees are to inform their immediate Supervisor if they are experiencing suspected COVID-19 related symptoms. They will also be provided with information on how to monitor symptoms and encounters that may increase their risk to COVID-19.
- That employees can report symptoms and hazards without fear of reprisal.
- For accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- On how employees can access COVID-19 testing when not required through the District provider, Rapid Covid Labs.
- On how we will provide testing and inform affected employees of the reason for the

required testing and the possible consequences of a positive test at-no cost, during their working hours either on-site or at a remote location.

- About COVID-19 hazards employees (including other employees 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, which will be regularly communicated through District emails, training, website postings, and/or one on one contact between employees and their direct supervisor.
- That employees are encouraged to stay home and contact their immediate supervisor if they suspect they have COVID-19 symptoms.

Fullerton School District has implemented a dedicated email for employees to ask questions related to COVID-19. Covidresponse@myfsd.org

IX. Training and Instruction

Fullerton School District will provide effective training and instruction that includes:

- Practices 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.

X. 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 10 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, per labor agreements and where permitted by law.
- Providing employees at the time of exclusion with information of available benefits and leave options to include work from home assignments.


XI. Reporting, Recordkeeping, and Access

It is Fullerton School District's practice 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.


XII. 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 10 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 10 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 10 days from the time the order to isolate was effective, or 10 days from the time the order to quarantine was effective.



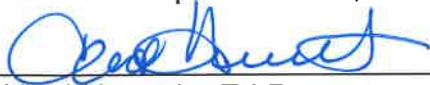
Robert Pletka, Ed.D.
Superintendent, Fullerton School District

1/29/2021
Date



Robert R. Coghlan, Ph.D.
Assistant Superintendent, Business Services

1/29/2021
Date



Chad Hammitt, Ed.D.
Assistant Superintendent, Personnel Services

1/29/2021
Date



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Fullerton School District OSHA Guidelines for Multiple Cases and Outbreak COVID-19 Prevention Plan (CCP)

Multiple Positive Cases Reported into the Same School / Department

If a school site and/or department experiences multiple cases (more than 2) within a 14-day period, the following guidelines will apply according to the District's CCP plan.

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

1. COVID-19 testing

Fullerton School District will provide COVID-19 testing to all employees at the 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. The District will work with Rapid Covid Labs to support this testing requirement.

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.

2. 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.

3. 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**.

4. COVID-19 investigation, review and hazard correction

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.

5. 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.

Major COVID-19 Outbreaks

If a school site/department experiences more than (20) COVID-19 cases within a 30-day period the following outbreak procedures will follow:

1. COVID-19 testing

Fullerton School District 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.

2. 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.

3. Investigation of workplace COVID-19 illnesses

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

4. 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.

5. 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.

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 _____

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
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			
Respiratory protection			

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.

Date: _____

Name of person conducting the investigation _____

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

Date: _____

Person that conducted the training _____

Employee Name	Signature