

**COVID-19 PREVENTION PROGRAM (CPP) FOR**  
Stockton Collegiate International Schools

March 2021

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

### **AUTHORITY AND RESPONSIBILITY**

The CEO / Head of School, has overall authority and responsibility for guiding the design of the provisions of this CPP in our workplace. Administrators have the authority and responsibility to design and oversee implementation of the provisions of this CPP in our workplace. Also, 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, 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.
- Symptomatic staff are sent home immediately. Symptomatic staff are directed to leave their work area and to leave the building in a manner with the least contact with others. Work areas of symptomatic staff are closed off immediately and cleaned per COVID-19 cleaning protocols.
- Symptomatic students are escorted to the designated quarantine area at the school office to await pick-up by parent/guardian. Symptomatic students are escorted from to the designated quarantine area in a manner with the least contact with others.

### **EMPLOYEE PARTICIPATION**

We provide regular COVID-19 testing for all employees, usually once every two weeks, but on a schedule that adjusts to any situation that warrants more or less frequent testing. All employees are required to participate in every round of testing. We have an open-door policy with employees to express any suggestions on a safe work environment.

### **EMPLOYEE SCREENING**

We screen our employees with temperature check-in stations at the building entrances designated for use by the employees. All employees are required to wear face coverings during the screening process. If the employee does not have a face-covering, then an authorized employee will provide a clean disposal mask. There are sufficient self-screening temperature check kiosks and sufficient non-contact

forehead thermometers to accommodate employees in a safe physically distanced manner. An authorized employee monitors the area during check-in. Reminders are posted to report any COVID-19 symptoms to Human Resources.

We require our employees to stay home if they are experiencing any symptoms of COVID-19.

### **CORRECTION OF COVID-19 HAZARDS**

Unsafe or unhealthy work conditions, practices, or procedures will be documented on **Appendix B: COVID-19 Inspections form** and corrected promptly based on the severity of the hazards, as follows with verbal or written communication. Human Resources will follow-up with any employee who was absent to ensure they are not experiencing any symptoms of COVID-19.

### **CONTROL OF COVID-19 HAZARDS**

#### **PHYSICAL DISTANCING**

Where possible, we ensure at least six feet of physical distancing at all times in our workplace. The arrival time window for employees is at least one hour which is long enough to accommodate temperature and symptom check-in in a safe manner. There is ample outdoor space and sufficient indoor space to accommodate employee lines and employee movement in a safe manner, with adequate space between employees.

Upon arrival students line up outside in designated areas. Each line is marked physically with line stanchions and cones. Lines are monitored by school personnel. Students are escorted into the building and to their classrooms by school personnel to monitor social distancing. Floors throughout the school have visual cues on the floor to remind employees and students to stay 6 feet apart. Doors have been designated for entrance and egress so that students do not pass each other entering and exiting. Hallways have been marked for one-way movement wherever feasible.

All visitors are seen individually and have their temperature checked before entering a school area. No visitors are allowed beyond the office area unless authorized by Administration to minimize unnecessary interaction. Notices requiring masks and reminders to stay 6 feet apart are posted on the outside of the school office. Floors throughout the school have visual cues on the floor to remind employees and students to stay 6 feet apart.

Classrooms have been set up so that there is 6' distance between students at their desks. Student supplies are in individual bins and supplies are not shared between students to reduce student contact.

#### **FACE COVERINGS**

We provide clean, undamaged face coverings and ensure that 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.

Employees and visitors are offered disposal face masks. If we encounter non-employees/employees that are not wearing face coverings, there is a social distanced courtesy warning to comply. The consequence of not complying is being removed from the building.

Staff are required to wear facemasks. Clean, disposable facemasks are available for staff who do not have a mask. Staff who do not comply will be sent home.

Students who return for in-person instruction must wear face coverings at all times. Students who do not comply with the rules governing facemask—the requirement to wear one and the requirement to wear an approved type—will be sent home. Students who do not comply with the rules governing facemasks will be escorted to the office to await pick-up by a parent.

Written notices of the facemask requirement are posted at all entrances. Visual guidance on the correct way to wear facemask are posted at all entrances and throughout the buildings.

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.

## **ENGINEERING CONTROLS**

In situations where we cannot maintain at least six feet between individuals, we implement alternative measures such as installing a physical barrier, such as clear plastic guards, or establishing paths through the workspace that maintain distance between employees. These are examples of safety measures that may be taken; it is not intended to be an exhaustive list.

To the extent feasible, the quantity of outside air is maximized in our buildings with mechanical or natural ventilation systems. The ventilation systems in all buildings have been reviewed with landlords and our HVAC maintenance companies to maximize air exchange. When warranted, building systems are supplemented with individual room units. The ventilation system is maintained quarterly and will be contacted if there are any concerns.

## **CLEANING AND DISINFECTING**

All custodians have been trained on proper disinfecting technique and have completed safety trainings.

All cleaning supplies are provided by a vendor specializing in commercial cleaning. All cleaning supplies have been reviewed for their effectiveness against COVID-19. All custodians have been trained on the proper use of the cleaning supplies.

Custodial staff is sufficient to provide regular disinfection throughout the day. Custodian schedules are arranged to rotate regularly through all workspaces multiple times each day. Frequently touched surfaces, such as door handles, are wiped and disinfected at least every hour.

Common areas, such as staff break rooms, have been closed. Microwaves have been placed in open areas to reduce any close contact congregating. Custodians regularly wipe down and disinfect tables in use in the open areas. Tables and chairs that are used by the public or staff are cleaned between uses.

Custodial staff is sufficient and will be scheduled appropriately in order to clean classrooms between use by cohorts of students. Desks, chairs, doors, door handles, will be cleaned. Floors will be vacuumed. Students will not share any supplies or equipment.

Should we have a COVID-19 case in our workplace, custodians will thoroughly clean the affected room(s) and the room will be placed out of use for three days.

### **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 not be shared, to the extent feasible. School issued cell phones used by campus monitors, aides, and custodians are unique to each employee; the phones are turned in daily and will be disinfected between daily uses by Human Resources. School issued cell phones used by teachers remain in the teachers' possession and are not shared. At the start of the work shift, Human Resources will provide a disinfected phone to the campus monitors, aides, and custodians at temperature check in. All cell phones are stored in a secured locked room.

Students will not share supplies or equipment. Each student will have their own container for supplies. These containers and supplies are not shared. Distribution of the containers will be done in a manner to reduce contact between students. Classrooms have been emptied of extraneous shelves, furniture, and decorations in order to reduce surfaces and facilitate cleaning.

### **HAND SANITIZING**

To implement effective hand sanitizing procedures, we have CDE notices in multiple languages on the proper technique for handwashing. There are hand sanitizing stations throughout the school site in open common areas. Each classroom has at least one bottle of hand sanitizer available for staff and students.

Visual reminders of the need for handwashing and visual descriptions of COVID-19 handwashing techniques are posted in all restrooms and throughout the building. Staff have regularly scheduled breaks to accommodate handwashing. Students will be guided and reminded by teachers to wash their hands in a COVID-19 appropriate manner. Handwashing videos at age appropriate levels are used by teachers to promote COVID-19 appropriate handwashing techniques.

### **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. PPE supplies are sufficient to provide all staff with gloves, goggles, and face shields.

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 COVID-19 exposure will be directed to stay home and in all cases will not be permitted to return to work until the appropriate quarantine period has been observed. Any employee who had potential COVID-19 exposure in our workplace will be tested for COVID-19 at least 5 days after the last known date of exposure.

Notifications will go to student(s) and their parent(s)/guardian(s) if the student(s) had COVID-19 exposure at the school. Students will be tested for COVID-19 at least 5 days after the last known date of

exposure and will be directed to stay home and in all cases will not be permitted to return to school until the appropriate quarantine period has been observed.

Employees are provided regular COVID-19 testing, usually once every two weeks, but on a schedule that adjusts to any situation that warrants more or less frequent testing. All employees are required to participate in every round of testing. The procedures for the testing are communicated through email and other regular methods of communication within the school. There will be no cost to the employee for participating in testing.

Employees who have COVID-19 symptoms or have been exposed to someone with COVID-19 will be tested via a PCR test and sent home. Employee submits the test results to Human Resources. If information from the employee about the timing of the exposure to someone with COVID-19 indicates that the exposure was within the past 5 days, employee is sent home and the COVID-19 test is administered after at least 5 days from the date of potential exposure.

Students who show of COVID-19 or have been exposed to someone with COVID-19 will be escorted to the designated quarantine location to await pick-up. Students will be tested for COVID-19 via a PCR test before the student leaves the school. Students will be directed to stay home and in all cases will not be permitted to return to school until the appropriate quarantine period has been observed. If information from the student and family about the timing of the exposure to someone with COVID-19 indicates that the exposure was within the past 5 days, the student is sent home and the COVID-19 test is administered after at least 5 days from the date of potential exposure.

Asymptomatic testing of all students who return for in-person instruction will be conducted every two weeks.

## **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 to the Human Resources team through verbal or written notice. Every employee has the Human Resources phone number and email in order to reach HR at any time.
- Employees can report symptoms and hazards without fear of reprisal to Human Resources. The office will review the suggestion and evaluate possible or necessary actions.
- Major COVID-19 Outbreaks: Administration will email all employees the plan of action.
- If an employee is absent from work, we contact them to determine if they are experiencing any COVID related symptoms and discuss return to work protocols.

## **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 facecoverings.
- 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 not coming to work if the employee has COVID-19 symptoms.
- The entrance of the doors includes notices notifying to wear face coverings and to be self-aware if they are experiencing any COVID-19 symptoms.
- Administrators will review the requirements of the safety plan with all supervisors.
- Staff will be trained on the requirements of the safety plan by the appropriate supervisors.
- Teachers will be trained on the requirements of the safety plan by administrators and through direct observation in order to insure understanding and compliance.
- Families will be informed of the safety plan requirements through the school's regular communication avenues including ManageBac messages, emails, and the school's website.
- Communications and training will include links to health agency guidelines, instructional videos, literature and resources.
- Students will be instructed on the safety plan requirements through age appropriate videos and COVID-19 safety literature and resources.
- Families will be educated about the application and enforcement of the safety plan through the school's regular communication channels, including ManageBac messages, emails, and the school's website.

### **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 a minimum of 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. This will be accomplished by reviewing a case-by-case basis to decide on the action taken.
- 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 by request at the 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 as otherwise required by law, with personal identifying information removed.
- San Joaquin County Public Health Services will be notified immediately of any +COVID-19 staff or student.
- Lisa Lee is the designated staff responsible to support contact tracing and submission of lists of exposed students and staff to SJC PHS.
- Lisa Lee is the designated staff responsible for the notification of exposed persons.
- Lisa Lee is the designated contact person for SJC PHS to contact about COVID-19.

#### **RETURN-TO-WORK and RETURN TO SCHOOL CRITERIA AFTER COVID-19**

- 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 or school 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 result will not be required from an employee or a student who had COVID-19 in order for that employee to return to work or school.
  - If an order to isolate or quarantine an employee or student is issued by a local or state health official, the employee or student will not return to work or school 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 14 days from the time the order to quarantine was effective.
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**Lisa Lee, Administrator**



## **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, students, parents/guardians, 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 that participated:**

<b>Assessment Area</b> Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	<b>Places and times</b>	<b>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</b>	<b>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</b>

**Additional Comments:**

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**APPENDIX B: COVID-19 INSPECTIONS**

Date: \_\_\_\_\_ Name of person conducting the inspection: \_\_\_\_\_

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

Exposure Controls	Yes	No	N/A	Area to Be Addressed (immediately/soon/in the future)
<b>Engineering</b>				
<b>Administrative</b>				

**Additional Comments:**

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## **APPENDIX C: INVESTIGATING COVID-19 CASES**

All personal identifying information of COVID-19 cases 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 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:**

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</b>	
<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>			
<b>Notice given (<i>within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case</i>) of the potential COVID-19 exposure to:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		

<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>		<b>What could be done to reduce exposure to COVID-19?</b>	
<b>Was local health department notified?</b>		<b>Date:</b>	

## **APPENDIX E: COVID-19 School Incident Command System**

Administration Team, under the direction of CEO /Head of School, is responsible for designing the COVID-19 response protocols for Stockton Collegiate International Schools.

The Human Resources department is responsible for implementing the COVID-19 response protocols and maintaining all necessary documentation in a secure manner. Human Resources Administrator is responsible for responding to any adjustments in protocols as determined by the CEO / Head of School or designee.

Facilities Director is responsible for managing custodial staff in response to COVID-19 incidents according to the established COVID-19 prevention protocols, including as adjusted by CEO / Head of School when necessary.