

COVID-19 Prevention Program (CPP) for The Wesley School

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

Date: 1/28/2021

Authority and Responsibility

Julie Galles, Interim Head of School has 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.

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.

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: paying attention to their

campus environment and reporting to the Interim Head of School or Associate Heads of School any hazards, concerns, or questionable occurrences.

Employee screening

The Wesley School employees who report to work on campus shall self-screen daily by checking their temperature and observing for other symptoms associated with COVID-19 prior to leaving for work. An employee exhibiting one or more symptoms associated with COVID-19 shall stay home and notify their supervisor and the safety officer of the reason for their absence. Employees who report symptoms associated with COVID-19 may return to School after they have met the requirements set forth in the sick policy.

Additionally, all school employees that report to work on campus are required to be screened before engaging in work and employees should anticipate some delays due to the screening procedures and arrive early. Non-exempt employees will be compensated for any screening and waiting time.

Upon arrival, a designated screener, with a face covering properly worn, will:

- Take the employee's temperature using a non-invasive contactless infrared thermometer. The employee will also have a face covering properly worn. (If necessary, the designated screener may take an employee's temperature a second time to confirm the results of the first test or if the results of the first test suggests an erroneous result.)
- Visually check the employee for symptoms associated with COVID-19;
- Ask whether the employee has experienced symptoms associated with COVID-19 within the last 24 hours;
- Ask whether anyone in the employee's household has had symptoms associated with COVID-19 or a positive COVID-19 test.

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:

When a hazard is identified, and the severity of the hazard is assessed, the Operations Manager will determine if a member of our facilities team can resolve the issue in the time frame necessary for the correction. If they are unable to do so, a third-party vendor will be contacted to make the necessary adjustments to address the hazard in order to make physical work conditions and environment safe and healthy.

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. (The administrators that share offices have a schedule of when they can work in their office exclusively, while the office-mate works from home or elsewhere on campus.)
- Signs are posted with the number of occupants allowed at a time in common areas such as the Faculty Lounge (6) and the Work Room (3).
- To reduce the number of people on campus, visitors must get prior approval from the Interim Head of School before entering the campus. All students and visitors go through the same screening protocols as the employees.
- Visual cues such as signs and floor markings have been implemented around campus to indicate where employees, students, and others should be located or their direction and path of travel.
- Staggered drop-off and pick-up locations to limit large groups from forming have been implemented. We have designated entry/exit points to be used exclusively by specific grades for both drop off in the morning and pick up in the afternoon. Each entry/exit point is supervised by specific groups of adult staff to facilitate maximum safety. Students remain in their classrooms until a parent/ guardian arrives and then communication to the classrooms is delivered through walkie talkies.
- A staggered lunch schedule will be implemented when the students return on a full day schedule. Lunch tables have been staggered across the campus in order to comply with the physical distancing protocols allowing only two per table.
- For details, please reference section **3205(c)(6)**

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

Face Coverings

State and local mandate required that we as K-12 faculty, staff, administration and students wear a face covering while at school, except during designated meal times. Face coverings must be made out of breathable cloth materials, cover the entire nose and mouth area, and be secured to the person's head with elastic ties or straps. Gaiters and bandanas do not meet the standards for face coverings. Cloth face coverings are meant to protect other people in case the wearer is unknowingly infected. Employees should comply with CDC training on proper use, removal, and washing of cloth face coverings.

Employees with medical conditions or disabilities that prevent them from being able to wear a cloth face covering will be provided with accommodations, which may include wearing a face shield with a cloth drape attached across the bottom and tucked into a shirt. This is a possible accommodation made for specific medical conditions or disabilities; it is not a matter of comfort or preference. The determination for this accommodation will be made on a case-by-case basis consistent with the School's policy on reasonable accommodation of employees.

Faculty and staff will be provided with several face covering options; however, they may use personal cloth face coverings. Face coverings that no longer cover the nose and mouth, do not stay on the face, are soiled, or have holes or tears are not acceptable and must be discarded. Faculty and staff are responsible for maintaining face coverings with proper care and fabric face coverings should be washed daily per CDC guidance.

Faculty will be allowed to use face shields or clear face coverings, which enable younger students to see their faces and to avoid potential barriers to phonological instruction. Faculty and staff are responsible for maintaining these coverings with proper care and fabric and they should be cleaned daily per CDC guidance.

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 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.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

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

Plexiglass screens, spatial barriers or other physical barriers of at least 6 feet are in use in reception areas of the school and other areas where school administrators interact with the public, students, and/or staff.

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

Installation of upgraded ventilation systems and equipment to increase clean air and dilute potential harmful contaminants within school ventilation systems. An experienced/certified HVAC (heating, ventilation, and air conditioning professional) has been consulted in evaluating and making changes to our HVAC system and equipment. We have followed ASHRAE (American Society and Air-Conditioning Engineers, Guidance for Building Operations During the COVID-19 Pandemic. And additional review of ASHRAE Guidelines for Schools and Universities.

Cleaning and disinfecting

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

- Cleaning and disinfecting frequently touched surfaces, such as playground equipment, door handles, sink handles, drinking fountains within the school.
- We do our best not to share objects when possible (if not possible, objects are cleaned after each use)
- The Wesley School's contracted cleaning crew, including the internal custodial department, will routinely clean and disinfect commonly touched objects and surfaces such as elevator buttons, handrails, copy machines, faucets, and doorknobs on a daily basis.
- Surfaces will be cleaned with soap and water prior to disinfection. These procedures will include:
 - Using disinfectants that are EPA-approved for use against COVID-19.
 - Providing EPA-registered disposable wipes for employees to wipe down commonly used surfaces before use.
 - Following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time).
 - Ensuring there are adequate supplies to support cleaning and disinfection practices.

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 the staff/faculty present at the time the necessary disinfecting must take place, and with the internal cleaning crew after hours/between the end of each work day and the

beginning of the next. Training and materials have been provided to staff/faculty for these situations.

Common areas must be self-managed and cleaned by the user after each use with a disinfectant located at cleaning stations around the facility. This includes:

- Teachers' lounge, Conference room tables, chairs, and equipment such as computers, remote controls, keyboards, and mouse before and after use.
- Work areas and tables or collaboration areas must be cleaned before and after use.

Hand sanitizing

(Handwashing and Hand Sanitizing Policy)

· Handwashing and hand sanitizing are two effective ways to prevent the spread of viruses and bacteria in our community and they are a part of daily good hygiene practices. Thus, to maintain the health and safety of our community, handwashing and hand sanitizing several times throughout the day is expected. Community members are expected to wash their hands for a minimum of 20 seconds, or to use hand sanitizer when a sink is unavailable.

· We look to the adults on campus to promote and reinforce regular handwashing of students. Hand-washing should take place at the beginning of the day, before and after meals, after outside play, after using the restroom, after coughing or sneezing, touching the face, blowing the nose, cleaning, sweeping, mopping, eating, drinking, and before and after classroom activities that involve sharing supplies and materials.

· All adults will teach and reinforce CDC guidance on proper handwashing techniques found [here](#). We will also reinforce healthy hygiene practices including avoiding contact with eyes, nose, and mouth, and covering coughs and sneezes among students and staff. Adults will remind students to use tissue to wipe their nose, to cough/sneeze inside a tissue or their elbow, and to wash or sanitize their hands afterwards.

Handwashing Procedure:

Washing your hands is easy, and it's one of the most effective ways to prevent the spread of germs. Clean hands can stop germs from spreading from one person to another and throughout an entire community—from your home and workplace to childcare facilities and hospitals.

Follow these five steps every time:

1. Wet your hands with clean, running water (warm or cold), turn off the tap, and apply soap.
2. Lather your hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.
3. Scrub your hands for at least 20 seconds. Need a timer? Hum the “Happy Birthday” song from beginning to end twice.
4. Rinse your hands well under clean, running water.
5. Dry your hands using a clean towel or air dryer.

Use Hand Sanitizer When You Can’t Use Soap and Water

Washing hands with soap and water is the best way to get rid of germs in most situations. If soap and water are not readily available, you can use an alcohol-based hand sanitizer that contains at least 60% alcohol as indicated by the product label. Sanitizers can quickly reduce the number of germs on hands in many situations. However:

- Hand sanitizers do not get rid of all types of germs.
- Hand sanitizers may not be as effective when hands are visibly dirty or greasy.
- Hand sanitizers might not remove harmful chemicals from hands like pesticides and heavy metals.
- Children under 9 should use hand sanitizer under the supervision of an adult.

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. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

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.

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

In the event a student, employee, or visitor who exhibits symptoms of COVID-19 or who tests positive for COVID-19 has been on the School campus, the School will close all

areas of the campus the individual used or visited. The School will wait 24 hours before having our third-party cleaning crew clean and disinfect the areas. The cleaning crew will use disinfectants from List N and will wear appropriate PPE while cleaning and disinfecting the areas. If the cleaning and disinfection is performed by School-employed maintenance and facilities staff, we will provide the staff with the appropriate PPE. All members of the community will be prohibited from entering the areas until after they have been cleaned and disinfected. In addition, any and all surfaces touched or suspected to be touched by the individual will also be cleaned and disinfected.

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:

- Advised about and/or provided COVID-19 testing at no cost during their working hours.
- The information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

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:

- To whom employees should send an **email** re: COVID-19 symptoms and possible hazards - **safetyofficer@wesleyschool.org**.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness:

This policy applies to and covers all School employees who can demonstrate that they are at higher risk of severe illness if they contract the virus that causes COVID-19 because they are age 65 or older or have one or more of the underlying medical conditions enumerated below.

Based on the available information at the time that this policy was adopted, the Centers for Disease Control and Prevention (“CDC”) identifies the following individuals as those who might be at higher risk of severe illness if the individual contracted the virus that causes COVID-19:

- **People 65 years of age and older;**
- **People who have chronic lung disease;**
- **People with moderate to severe asthma;**
- **People who have serious heart conditions;**

- **People who are immunocompromised by conditions such as cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, and prolonged use of corticosteroids and other immune weakening medications;**
- **People with severe obesity (body mass index of 40 or higher);**
- **People with diabetes;**
- **People with chronic kidney disease undergoing dialysis; and**
- **People with liver disease**

The School may modify the above enumerated conditions based on new information or guidance provided by the CDC or other public health authorities.

Further, employees may request accommodations, and the School will consider these requests, if they are unable to safely distance themselves from members of their household who are at higher risk of severe illness if they contract the virus that causes COVID-19.

Testing Protocols

Testing frequency will be on a weekly rotation for those staff and faculty providing services on campus.

In addition to providing Covid-19 testing (PCR) on campus on Jan. 26, Feb. 2, and Feb. 9, (additional dates will likely be added), testing can be accessed as follows:

- Los Angeles County has free testing locations. Make sure you bring your ID with you to the appointment. Other personal information may be required when you make an appointment (insurance, social security number, etc.) There is a testing location just up the street from the School. Learn more from this [testing options document](#).
- Kaiser: Kaiser recommends going through the Advice Nurse. Explain that you work for a school and it is mandated for school employees to get tested. Call 1-833-574-2273.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for this testing, inform affected employees of the reason for the testing, and provide advice and required protocols proceeding a positive Covid-19 test result. (See CCR Title 8, [section 3205.1](#) for more details.)
- We will communicate information about COVID-19 hazards which 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.
- The school will continue to evaluate any additional Covid-19 related issues and communicate the necessary information with the community on an ad hoc basis, while keeping in mind privacy and need-to-know considerations.

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 are posted on the Faculty Portal.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws are posted on the Faculty Portal.
- 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.
- A Disinfecting & Sanitizing Meeting was held and can be reviewed on the Faculty portal.

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:

- Employees exhibiting symptoms associated with COVID-19 will not be allowed to return to school until they have met the options outlined in The Wesley School's COVID Specific Sick Policy.
- No employees of The Wesley School who have a fever above 100 or other symptoms associated with COVID-19 will be permitted on campus. If the screener

determines that an employee is presenting with symptoms associated with COVID-19, the employee will not be allowed to enter the campus and will be sent home.

- Employees who are sent home based on symptom screening results must notify their supervisor and the safety officer as soon as possible by phone or email and await further instructions. The School may track employees' potential exposure to COVID-19, and such documentation, as well as any documentation regarding an employee's medical symptoms, will be considered confidential medical records.

- If an employee subsequently reports that they have tested positive for COVID-19, the School will notify the school community without disclosing any personally identifiable information. In addition, the School will consult with the local county department of public health to determine necessary next steps.

- Employees exhibiting symptoms associated with COVID-19 will not be allowed to return to school until they have met the options outlined in The Wesley School's COVID Specific Sick Policy.

- 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 employees who are able to do their jobs at home may work remotely. If an employee has been tested positive for COVID-19 or experiencing symptoms and is unable to work, they may use the Emergency Paid Sick Leave (EPSL), 10 paid sick days which is set to expire on March 31, 2021.

- 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 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 14 days from the time the order to quarantine was effective.

Julie Galles
Interim Head of School

Date 1/28/2021