# Oak Park USD COVID-19 School Safety Plan

February 4, 2021





Date: 2/4/21

# 2021 COVID-19 School Guidance Checklist

Name of Lo	ocal Educational Agency o	r Equivaler	nt: <u>Oak</u>	Park Ur	nified S	<u>chool District</u>	
Number of	Schools: <u>8</u>						
Enrollment:	<u>4,363</u>						
Superintend	dent (or equivalent) Name	: <u>Dr. Antho</u>	ny Knig	<u>ht</u>			
	5801 Conifer Street Oak Park, CA 91377	Phone Email:	e Numb			<u>206</u> ousd.org	
Date of proposed reopening: 3/1/21			Grade Level (check all that apply)				
County: <u>Ventura</u>		State Re		Plan. Ad	dditional	f TK-5 under curre grade levels to b	
Current Tier	: <u>Purple</u>	⊠TK	$\boxtimes 2^{\text{nd}}$	⊠5 <sup>th</sup>	□8 <sup>th</sup>	□11 <sup>th</sup>	
Type of LEA	a: <u>Public</u>	⊠K	$\boxtimes 3^{rd}$	□6 <sup>th</sup>	□9 <sup>th</sup>	□12 <sup>th</sup>	
		<b>⋈ 1</b> s†	⊠4 <sup>th</sup>	□7 <sup>th</sup>	□10 <sup>th</sup>		

This form and any applicable attachments should be posted publicly on the website of the local educational agency (or equivalent) prior to reopening or if an LEA or equivalent has already opened for in-person instruction. For those in the Purple Tier, materials must additionally be submitted to your local health officer (LHO), local County Office of Education, and the State School Safety Team prior to reopening.

The email address for submission to the State School Safety for All Team for LEAs in Purple Tier is: K12csp@cdph.ca.gov

LEAs or equivalent in Counties with a case rate >=25/100,000 individuals can submit materials but cannot re-open a school until the county is below 25 cases per 100,000 (adjusted rate) for 5 consecutive days.

# For Local Educational Agencies (LEAs or equivalent) in ALL TIERS:

☑I, Anthony Knight, post to the website of the local educational agency (or ). equivalent) the COVID Safety Plan, which consists of two elements: the COVID-19 Prevention Program (CPP), pursuant to CalOSHA requirements, and this CDPH COVID-19 Guidance Checklist and accompanying documents, which satisfies requirements for the safe reopening of schools per CDPH Guidance on Schools. For those seeking to open while in the Purple Tier, these plans have also been submitted to the local health officer (LHO) and the State School Safety Team.

I confirm that reopening plan(s) address the following, consistent with guidance from the California Department of Public Health and the local health department:

**Stable group structures (where applicable):** How students and staff will be kept in stable groups with fixed membership that stay together for all activities (e.g., instruction, lunch, recess) and minimize/avoid contact with other groups or individuals who are not part of the stable group.

Please provide specific information regarding:

How many students and staff will be in each planned stable, group structure? (If planning more than one type of group, what is the minimum and maximum number of students and staff in the groups?)

Students will be in stable groups not to exceed 18:2 (students:staff), dependent upon the classroom size and ability to maintain 6 feet distancing within a classroom. Students will be divided into "A" and "B" Groups. "A" students will attend on Monday/Tuesday and "B" students will attend Wednesday/Thursday for full day instruction.

Students will stay together and be separate from other stable groups for all activities, including recess and lunch.

If you have departmentalized classes, how will you organize staff and students in stable groups?

No departmentalized classes will be offered at this time (DK-5 opening)

If you have electives, how will you prevent or minimize in-person contact for members of different stable groups?

No electives will be offered at this time (DK-5 opening)

**⊠Entrance**, **Egress**, **and Movement Within the School**: How movement of students, staff, and parents will be managed to avoid close contact and/or mixing of cohorts.

Details provided in OPUSD Reopening Plan Sec. 3

**☑ Face Coverings and Other Essential Protective Gear:** How CDPH's face covering requirements will be satisfied and enforced for staff and students.

Details provided in OPUSD Reopening Plan Sec. 1, Subsection 3

■ Health Screenings for Students and Staff: How students and staff will be screened for symptoms of COVID-19 and how ill students or staff will be separated from others and sent home immediately.

# Details provided in OPUSD Reopening Plan Sec. 6

■ Healthy Hygiene Practices: The availability of handwashing stations and hand sanitizer, and how their safe and appropriate use will be promoted and incorporated into routines for staff and students.

# Details provided in OPUSD Reopening Plan Sec. 1, Subsection 2

**Identification and Tracing of Contacts:** Actions that staff will take when there is a confirmed case. Confirm that the school(s) have designated staff persons to support contact tracing, such as creation and submission of lists of exposed students and staff to the local health department and notification of exposed persons. Each school must designate a person for the local health department to contact about COVID-19.

# Details provided in OPUSD Reopening Plan Sec. 7

**☑Physical Distancing:** How space and routines will be arranged to allow for physical distancing of students and staff.

Please provide the planned maximum and minimum distance between students in classrooms.

Maximum 10 feet.

Minimum 6 feet.

■ Staff Training and Family Education: How staff will be trained and families will be educated on the application and enforcement of the plan.

# Details provided in OPUSD Reopening Plan Sec. 1

■**Testing of Staff:** How school officials will ensure that students and staff who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results.

# Details provided in OPUSD Reopening Plan Sec. 7

Below, please describe any planned periodic asymptomatic staff testing

cadence.

Staff asymptomatic testing cadence. Please note if testing cadence will differ by tier:

Testing cadence is reliant on case rates as follows:

CR > 14 – Symptomatic and response testing plus weekly asymptomatic PCR testing

Purple/Red Tier: Symptomatic and response testing plus every 2 weeks asymptomatic testing

Orange/Yellow Tier: Symptomatic and response testing

**☑Testing of Students:** How school officials will ensure that students who have symptoms of COVID-19 or have been exposed to someone with COVID-19 will be rapidly tested and what instructions they will be given while waiting for test results.

Details provided in OPUSD Reopening Plan Sec. 7

Below, please describe any planned periodic asymptomatic student testing cadence.

Testing cadence is reliant on case rates as follows:

CR > 14 – Symptomatic and response testing plus weekly asymptomatic PCR testing

Purple/Red Tier: Symptomatic and response testing plus every 2 weeks asymptomatic testing

Orange/Yellow Tier: Symptomatic and response testing

**☑Identification and Reporting of Cases:** At all times, reporting of confirmed positive and suspected cases in students, staff and employees will be consistent with Reporting Requirements.

Details provided in OPUSD Reopening Plan Sec. 8

**⊠Communication Plans:** How the superintendent will communicate with students, staff, and parents about cases and exposures at the school, consistent with privacy requirements such as FERPA and HIPAA.

Details provided in OPUSD Reopening Plan Sec. 7, Subsection 5

# ☑Consultation: (For schools not previously open) Please confirm

Name of Organization(s) and Date(s) Consulted:
Name: Oak Park Teachers Association
Meeting dates 1/22/21& 1/29/21

Name: Oak Park Classified Association Meeting date: 1/26/21

> Name: <u>Parent Teacher Organization Council</u> Meeting Date: 1/28/21

# Attendance sheets attached

# For Local Educational Agencies (LEAs or equivalent) in **PURPLE**:

 $\square$  Local Health Officer Approval: The Local Health Officer, for Ventura

County: Dr. Robert Levin

County has certified and approved the CRP on this date:

If more than 7 business days have passed since the submission without input from the LHO, the CRP shall be deemed approved.

# **Additional Resources:**

Guidance on Schools Safe
Schools for All Hub

#### Attendance Sheet

#### **OPUSD** Consultations

# Oak Park Teachers Association Meetings

# 1/22/21 & 1/29/21

**OPTA** 

**Russ Peters** 

Brandie Pryor

Beth Ruben

Tim Roesner

District

Erin Vranesh

Adam Rauch

Stew McGugan

Jay Fernow (Attorney)

# Oak Park Classified Association Meeting 1/26/21

**OPCA** 

Regina Pahn

Oscar Jimenez

Virginia Standring

Ben West (Rep)

District

Erin Vranesh

Adam Rauch

Stew McGugan

Jay Fernow (Attorney)

# Parent Teacher Organization Council Meeting 1/28/21

**Parents** 

Darren Smith

Edward Park

Helen Tesoro

JoLynn Khordodi

Lauren Ross

Ty Avendano

Vicki Hall

Darcy Gilbert

Tina Kadner

District

Tony Knight

Ragini Aggarwal

# Reopening & COVID-19 Mitigation Plan

*Update 2/4/21* 

District: Oak Park Unified School District, 5801 Conifer Street, Oak CA 91377

# **District VCPH Liaisons**

NAME	TITLE	WORK LOCATION	EMAIL ADDRESS	OFFICE & CELL
				NUMBERS
Holly Baxter	Coordinator, Safety &	District Office	hbaxter@opusd.org	818-735-3200 x0234
	Equity			818-264-6833
Allie Levine	District Nurse	District Office	alevine@opusd.org	818-735-3274
				818-324-3016

School sites and programs included in the following plan are: list all school sites/Club Oak Park/Oak Park Neighborhood School, etc.

# 1. Promote Healthy Hygiene Practices

- 1. Disseminate <u>Educational Resource Tools</u> to teach school staff, students, and families about best hygiene practices (how to wear face coverings, handwashing and cover your cough)
- 2. Schedule for routine hand washing and ensure adequate supplies to support healthy hygiene

Plan:	Person(s) responsible	Date of Implementation
1. Educational Resource Tools	Office managers	8/3/20
<ul> <li>All staff will view and acknowledge understanding of the following CDC</li> </ul>	Director of Extended Care	
provided resources:	Safety coordinator	
<ul> <li>Video - How to Wear a Cloth Face Covering</li> </ul>	Teachers	
<ul> <li>Video - Social Distancing</li> </ul>		
<ul> <li>Video - Stop the Spread of Germs</li> </ul>		
<ul> <li>Video - Symptoms of Coronavirus</li> </ul>		
<ul> <li>Video - Managing Anxiety and Stress</li> </ul>		
<ul> <li>Staff supervising sports activities will view the additional resources of:</li> </ul>		
<ul> <li>Video: Youth Sports Video - Protect Players from COVID-19</li> </ul>		

Students will	ll view the following in their classrooms:		Upon return to in-person
	eo - How to Wear a Cloth Face Covering		instruction
	eo - Social Distancing		instruction
	eo - Stop the Spread of Germs		
	l receive links to view the following resources:		Upon return to in-person
	eo - How to Wear a Cloth Face Covering		instruction
	eo - Social Distancing		nistruction
	eo - Stop the Spread of Germs		
	eo - Symptoms of Coronavirus		
	eo - Parents Supporting Children and Teens		
	chedule and considerations	Supervisory Staff	8/3/20
	sitors will be instructed to wash or sanitize hands:	Office Managers	0/3/20
	en entering or exiting campus	Office Managers	
	each break or once per hour at minimum		
	ore and after handling food or eating	Teachers	
	ore and after giving medicine (Health Techs only)	Classroom Aides	
	ool Nutrition workers will be required to wash their hands every 30	Supervisory Staff	
	utes at a minimum	Supervisory Starr	
	ll be instructed to wash or sanitize hands:		Upon return to in-person
	en entering campus		instruction
	ering/exiting classrooms		motraction
	er lunch period		
	er snack and lunch periods in childcare program		
	zer/sanitizing stations/ hand washing stations will be available	Director of Operations	Upon return to in-person
	each entrance to campus		instruction
	ach office area		
	ach classroom		
o In hi	igh traffic and eating areas		
	ng equipment being added to sites	Director of Operations	In process
	ch free hand soap dispensers - each bathroom, all sites		
	ch free paper towel dispensers - each bathroom, all sites		
	ch free hand sanitizer stations - (20 - High school; 7 -		
	/OPIS/OVHS; 15 - all other sites)		
	door hand washing stations - 4 each site		
	<del>-</del>		

	0	Bottled hand sanitizer (500 - High school; 400 - Middle School; 300 -		
	O	Elementary Sites; 200 - other)		
	0	Signage in bathrooms demonstrating appropriate hand washing protocols		
	0	Signage in elementary classrooms demonstrating appropriate hand		
	O		Safatry Canadinatan	8 /2 /20
	Staff I	washing protocols	Safety Coordinator	8/3/20
•			Office Managers	
	0	Staff who come into routine contact with others will be supplied with a	District Nurse	
		disposable 3-ply surgical mask.		
	0	Each health technician will be supplied with full-body PPE for use in		
		triage of suspected COVID-19 individuals		
	0	Head Maintenance staff will be supplied with full-body PPE for use in		
		cleaning rooms that have been occupied by individuals with confirmed		
		COVID-19		
	0	Special education staff will be provided with additional PPE for use		
		during assessments and in situations where 6 feet physical distancing is		
		not feasible due to disability-related needs		
	0	All staff will have access to N95 masks as requested		8/3/20
•	Face (	Coverings		
	0	All staff will be required to use facial masks		
	0	All students will be required to use facial masks.		
	0	OPUSD will follow VCPH provided guidance on Mask Exemptions for		
		Students (provided 11/11/20)		
2. Inte	nsity (	Cleaning, Disinfecting, and Ventilation		
		plan to prohibit or limit shared use of equipment, use of EPA products, and	schedule for cleaning and ventila	ation of area during cleaning.
Plan:			Person(s) responsible	Date of Implementation
1. Lim	it shar	ed use		•
•	Studer	nts will have an individual set of materials needed for daily classroom use.	Classroom teacher	Upon return to in-person
		als will be provided for students who can not provide their own. Materials	Athletic Coach	instruction
		labeled for individual use with the student's name and remain with the	Extended Care Staff	mor dedon
	studen		Enterided date offit	
•		equipment will not be shared between students.		
		equipment will only be shared in pairs or groups of three, with all		
	-	priate sanitizing procedures and safety protocols per CDPH Covid-19		
		n Guidance for Youth Sports		
	HITCH	ii Guidance for Toutii oports		

<ul> <li>Secondary lab equipment that requires multiple use will be sanitized between each use with school provided disinfectants.</li> <li>Technology equipment (keyboards, touch screen devices, etc.) will be sanitized before and after each use using alcohol based wipes with 70% or more alcohol.</li> <li>Shared classroom materials will be limited to the following:         <ul> <li>No more than four students will share materials between sanitization</li> <li>Students will be required to wash hands prior to using shared material</li> <li>Students will be required to wear a face mask during use of shared material</li> <li>Students will be required to wash hands after using shared material</li> <li>Students in grades DK-1 will be under direct supervision by an adult during use of shared material</li> <li>Shared materials will be sanitized between uses</li> </ul> </li> <li>* District protocol for Assessment and Intervention attached</li> </ul>		
2. Use of EPA products		
OPUSD will be using Enviro Care Neutral Disinfectant, manufactured by Rochester Midland Corporation, approved under EPA Emerging Pathogen	Director of Operations	8/3/20
Guidance		
OPUSD Nutrition services will be using Ecolab/Keystone Multisurface		
Peroxide Disinfectant And Glass Cleaner RTU (EPA Reg No. 1677-251)		
3. Schedule for Cleaning/Disinfection		
Staff will be provided with supplies for sanitizing high-touch surfaces in classrooms	Maintenance Staff	8/3/20
throughout the day	Extended Care Staff	
Doorknobs, faucets, lightswitches will be sanitized daily at a minimum		
<ul> <li>Restrooms will be sanitized daily</li> <li>Seating areas and lunch tables will be sanitized daily</li> </ul>		
<ul> <li>Every classroom and common work area will be fully sanitized, including chairs,</li> </ul>		
desks, and surfaces, after dismissal each school day		
Staff working in areas not considered as common areas (i.e. offices) will receive		
instruction in daily sanitization of high-touch surfaces using alcohol wipes		
Signage will be posted to instruct staff to sanitize shared equipment (i.e.		
photocopiers, laminators, etc.) after each use		

• At sec	condary sites, high-touch classroom surfaces will be sanitized between student	Safety Coordinator	
group	os —		
<ul> <li>Teach</li> </ul>	ners are encouraged to keep doors and windows open		
<ul><li>Doors</li></ul>	s used for access to common areas (library, passageways, etc) will remain open	Classroom Teachers	
to enc	courage airflow	Extended Care Staff	
<ul> <li>Exteri</li> </ul>	ior doors will remain open during sanitization processes inside classrooms or		
buildi	ings	Maintenance Staff	
<ul> <li>Classi</li> </ul>	rooms are equipped with CO2 sensors that regulate economizers, which		
auton	natically activate fans and maintain a fresh air supply.		
<ul> <li>Classi</li> </ul>	room sanitization will be logged in a visible area in each classroom.		
	en areas will be sanitized between shifts		

# 3. Implementing Distancing Inside and Outside the Classroom

- 1. Address arrival and departure of students (staggered schedules, directional routes)
- 2. Classroom sizes to maintain 6-foot distancing between individuals, student /educator Stable Groups to minimize contacts. (Include school / district bell schedules.)\*
- 3. Non-classroom spaces (limitation of nonessential visitors, use of outdoor space for instruction)\*

* Note: The use of face coverings does not allow for greater density of individuals in a classroom.			
1a. Arrival	Person(s) responsible	Date of Implementation	
School Programs			
■ ALL SITES/STUDENTS	Site Principal	Upon return to in-person	
<ul> <li>Arrival points will be clearly marked with 6 foot indicators for distancing</li> </ul>	Site Health Clerk	instruction	
and facial coverings will be required for parents and staff at entry points	Supervisory Staff		
<ul> <li>Students will be screened at each arrival point as per screening policies</li> </ul>			
outlined later in this document and gain access to campus only after			
negative screening			
<ul> <li>Students will be directed in one way route to their designated waiting area</li> </ul>			
<ul> <li>Staff will be positioned to monitor compliance with social distancing</li> </ul>			
<ul> <li>Parents/visitors will not be admitted to campus through arrival points</li> </ul>			
<ul> <li>Students arriving late to school will be directed to the health office where</li> </ul>			
staff will perform a symptom/temperature check before admittance			
<ul> <li>Halls and passageways will be marked for one-way traffic as feasible</li> </ul>			
■ Preschool			
<ul> <li>Students will arrived in staggered schedule</li> </ul>	Preschool Director	Upon return to in-person	
<ul> <li>Students will join Stable Group upon arrival</li> </ul>		instruction	

	T	
■ DK-5		
<ul> <li>Each site will have 4-6 designated arrival points with alphabetical and/or</li> </ul>	Site Principal	
grade level distribution of students assigned to each arrival point		Upon return to in-person
O Students will arrive in staggered schedule (DK-1; 2-3; 4-5)		instruction
<ul> <li>Students will walk from arrival point to designated class line waiting area</li> </ul>		
<ul> <li>Class lines will be clearly marked for appropriate distancing</li> </ul>		
<ul> <li>Students will wait for teachers in the waiting area</li> </ul>		
<ul> <li>Waiting area will be supervised by staff to ensure adherence to distancing</li> </ul>		
requirements		
1b. Departure		
• Preschool	Site Principal	Upon return to in-person
<ul> <li>Students are picked up individually by parent/guardian</li> </ul>	Teachers/Teaching Aides	instruction
<ul> <li>Each student will be accompanied to designated departure gate by staff</li> </ul>	Preschool Director	
and released directly to parent	Supervisory Staff	
■ Preschool, DK-5	Extended Care Staff	
O Students will be accompanied to designated departure gate by staff to wait		
for parents		
2. Schedule		
Preschool - planned opening date 8/24/2020	Preschool Director	8/24/20
Students will be assigned to either a morning or afternoon 10 person Stable Group		
Stable Group A will attend in the am		
Stable Group B will attend in the pm		
Extended and Early care will be available for each Stable Group		
Stable Groups will not mix or share interior spaces		
DK-5 - planned opening date TBD		Upon return to in-person
• Students (DK-5) will be scheduled in A or B Hybrid Stable Groups attending		instruction
campus on the following full-day schedule:	Site Principals	
O Monday - A		
o Tuesday - A		
o Wednesday - B		
o Thursday - B		
• Grade levels will be scaffolded into in-person instruction on the following schedule:		
Week one: DK-2nd grades		

<ul> <li>Week two: 3rd grade</li> </ul>		
<ul> <li>Week three: 4th &amp; 5th grades</li> </ul>		
Stable Groups will not exceed a number which allows for a minimum 6 foot		
distancing between students in classrooms		
Classes will not exceed a number which allows for a minimum 6 foot distancing		
between students in classrooms		
<ul> <li>Block scheduling at the secondary sites will minimize contacts</li> </ul>		
Stable Groups will not mix in any activities		
3. Classrooms		
	Preschool Director	8/24/20
Preschool  Classical transfer of the 10 to	1 resemble Director	0/27/20
• Classroom spaces will be limited to no more than 10 students		
Materials will be limited to those that can be sanitized easily		
• Carpeted areas will be marked to promote distancing.		
Outdoor spaces will be used for instruction whenever appropriate.		
Elementary (DK-5)	Site Principals	Upon return to in-person
• Students will be assigned to Stable Group (SG) to minimize exposure and simplify	Classroom Teachers	instruction
possible contact tracing		
<ul> <li>Stable Groups will consist of 10-15 students, dependent upon size of classroom</li> </ul>		
<ul> <li>Stable Groups will not exceed a number which is able to maintain 6-foot</li> </ul>		
physical distancing within the classroom		
• Students will remain with their SG for all classroom activities. SGs will not mix		
during instructional time unless required for the delivery of support services (i.e.		
academic intervention, English learner support, special education services)		
A student contact log for support services or activities that mix SGs will be		
maintained.		
Classroom Teachers will remain with a single SG during the day.		
Aides will be assigned to Grade Level Group (GLG) and will remain within that		
GLG during the work day to the maximum extent possible.		
Aides will practice appropriate hand washing procedures whenever leaving a SG		
setting to assist in another SG.		

<ul> <li>Classrooms will be arranged to provide six feet of distance between student desks, teacher's desks, and other seating areas.</li> <li>Classrooms will be arranged to decrease face-to-face contact between individuals.</li> <li>Carpeted areas will be marked to promote distancing.</li> <li>Outdoor spaces will be used for instruction whenever appropriate.</li> <li>Visitors and volunteers will not be allowed inside classrooms while students are present</li> </ul>		
<ul> <li>Small Cohort Groups - Specialized Instruction</li> <li>Whenever possible, instruction will take place outside in well-ventilated areas</li> </ul>		
<ul> <li>Cohorts will be limited to no more than 16 individuals (supervising adults and/or students)</li> </ul>		
Students and adults assigned to one cohort will not mix with any other cohort		
excepting in the case of students under five years of age, or individualized specialized services that may be provided with a special service provider who is not		
part of the cohort		
<ul> <li>Materials will be limited to those that can be sanitized easily</li> </ul>		
<ul> <li>Carpeted areas will be marked to promote distancing.</li> </ul>	Director of Student	
<ul> <li>Classrooms will be arranged to provide six feet of distance between student desks,</li> </ul>	Services	
teacher's desks, and other seating areas.	D 77 1	
• In necessary situations in which six feet of distance is not possible, other means of	Resource Teachers	
risk mitigation will be employed such as use of partitions, plexiglass shields, use of		
<ul> <li>face shields in addition to required facial covering, use of PPE, etc.</li> <li>Classrooms will be arranged to decrease face-to-face contact between individuals.</li> </ul>		
The total number of students included in a Small Cohort Group would not exceed		
more than 25% of the school's typical enrollment		
*Bell schedules attached		
4. Non-classroom spaces		
All sites will have signage and ground markings to enforce social distancing parameters	Director of Operations	8/3/20
The following areas/activities will be closed until further notice:		
Libraries		
O Computer labs		
Music rooms		
Indoor eating areas		

<ul> <li>Non-essential visitors will not be allowed on campus</li> <li>All essential visitors will notified of distancing requirements and will be required to wear a face covering when in common areas</li> <li>Staff will be instructed to consider holding any meeting via online apps or phone rather than in-person. In the case an in-person meeting is necessary, staff will be instructed to maintain physical distancing, wear protective face coverings, and minimize risk by utilizing larger areas with open airflow.</li> <li>Eating Areas         <ul> <li>Seating in all eating areas will be marked to ensure physical distancing.</li> <li>Student lunch schedules will be staggered to allow separation between Stable Groups</li> <li>Elementary student meals will be delivered to assigned tables</li> </ul> </li> </ul>	Site Principals	
4. Limit Sharing		
Describe plan to limit sharing and storage of student/educator belongings (food, materials,		
Plan:	Person(s) responsible	Date of Implementation
<ul> <li>Students will have an individual set of materials needed for daily classroom use. Materials will be provided for students who can not provide their own. Materials will be labeled for individual use with the student's name and remain with the student</li> <li>Shared technology equipment (keyboards, touch screen devices, etc.) will be sanitized before and after each use by adults.</li> <li>Specialized equipment such as changing tables or adaptive materials for special education use will be sanitized by adults before and after each student use.</li> <li>Special education assessment materials will be sanitized by the assessor before and after each student use.</li> <li>Shared classroom materials in DK-5 will be limited in use to the Stable Group between sanitization. Students will be required to sanitize hands prior to and after use and face coverings will be required during use.</li> <li>In regards to staff common areas, staff will be instructed to store food items for personal use in disposable bags, clearly labeled with name.</li> </ul>		

# 5. Train all Staff and Educate Families

- 1. Train all staff and educate families on COVID-19 specific symptom identification, physical distancing guidelines and their importance, use of face coverings, screening practices. prevention measures, and transmission of illness
- 2. Train staff on cleaning and disinfecting, use of personal protective equipment, first aid, surveillance of attendance (reporting, case management, and re-entry); contact tracing introduction for district liaisons; and HIPAA-FERPA

re-entry), contact tracing introduction for district haisons, and THFAA-FERFA		
1a. Training staff	Person(s) responsible	Date of Implementation
All staff will view and acknowledge CDC provided videos and information on	District Nurse	8/3/20
symptom identification, physical distancing guidelines and their importance, use of	Safety Coordinator	
face coverings, screening practices, prevention measures, and transmission of		
illness.		
Staff conducting student screenings will undergo additional training on screening		
procedures, symptoms, and isolation of suspected COVID-19 cases		
<ul> <li>Health Techs will undergo additional training on safe use of full PPE (gowns,</li> </ul>		
booties, face shields, hair coverings), identification of COVID-19 symptoms, and		
sanitation of infected surfaces		
<ul> <li>Teaching staff will undergo safety and hygiene training on symptom identification,</li> </ul>		
physical distancing guidelines, illness procedures and protocols, classroom safety		
procedures, prevention measures, and transmission of illness.		
Informational posters and signage will be utilized in all restrooms and in common		
areas		
1b. Education of families		
Families will receive District information and links to CDC provided videos and	Safety Coordinator	Upon return to in-person
information on symptom identification, physical distancing guidelines and their	Site Principals	instruction
importance, use of face coverings, screening practices, prevention measures, and		
transmission of illness.		
• Families will receive information on District protocols, procedures, and guidelines.		
<ul> <li>Families can utilize a dedicated email address (<u>safety@opusd.org</u>) for safety</li> </ul>		
concerns and questions		
OPUSD provided a weekly webinar series during November and December to		
educate families regarding safety and hygiene practices and protocols		
OPUSD maintains a Return to Instruction website with up-to-date information on		
safety, procedure, protocols, and community testing information		
2a. Additional staff training		
	Safety Coordinator	8/3/20

<ul> <li>Custodial staff will receive training on appropriate use of cleaning/disinfecting</li> </ul>	District Nurse	
products and materials	Director of Operations	
Teachers and support staff will receive training on appropriate use of in-class	_	
cleaners and disinfectants		
Special Education, Intervention and English Language support staff will receive		
training on increased sanitization and additional safety protocols (including		
student contact logs for tracing purposes) when mixing of students from different		
HCs and GLPs is required for service delivery		
Special Education assessors will receive training on increased sanitization and		
additional safety protocols to be implemented during assessments		
<ul> <li>Health Clerks and Lead Custodian will receive training on use of PPE</li> </ul>		
Health Clerks are trained in first aid procedures		
<ul> <li>Health Clerks, Office Managers, and Attendance Clerks will receive training on</li> </ul>		
attendance reporting, management of cases, and re-entry requirements		
<ul> <li>District Liaisons will undergo VCOE supplied training in contact tracing</li> </ul>		
<ul> <li>District Liaisons, Health Clerks, and Office Managers will receive instruction on</li> </ul>		
TERRAL . 1 .		
FERPA considerations		
FERPA considerations  6. Check for Symptoms - Screening Staff, Students, and Visitors		
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<ul> <li>6. Check for Symptoms - Screening Staff, Students, and Visitors</li> <li>Describe your plan to:</li> <li>1. Screen all students, staff, and visitors entering school facilities</li> <li>2. Monitor students and staff throughout the day for signs of illness</li> </ul>		
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<ul> <li>6. Check for Symptoms - Screening Staff, Students, and Visitors</li> <li>Describe your plan to:</li> <li>1. Screen all students, staff, and visitors entering school facilities</li> <li>2. Monitor students and staff throughout the day for signs of illness</li> <li>3. Support ill students and staff to remain at home without fear of reprisal</li> <li>1a Student screening <ul> <li>Parents will be encouraged to passively screen their student each day before departure for school site</li> </ul> </li> </ul>	Site Principal Health Technicians	-
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<ul> <li>Check for Symptoms - Screening Staff, Students, and Visitors</li> <li>Describe your plan to: <ol> <li>Screen all students, staff, and visitors entering school facilities</li> <li>Monitor students and staff throughout the day for signs of illness</li> <li>Support ill students and staff to remain at home without fear of reprisal</li> </ol> </li> <li>Student screening <ol> <li>Parents will be encouraged to passively screen their student each day before departure for school site</li> <li>Students will enter the campus each day through an assigned gate to limit crowding at entry points</li> </ol> </li> </ul>	Site Principal Health Technicians	Upon return to in-person
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<ul> <li>6. Check for Symptoms - Screening Staff, Students, and Visitors</li> <li>Describe your plan to: <ol> <li>Screen all students, staff, and visitors entering school facilities</li> <li>Monitor students and staff throughout the day for signs of illness</li> <li>Support ill students and staff to remain at home without fear of reprisal</li> </ol> </li> <li>1a Student screening <ol> <li>Parents will be encouraged to passively screen their student each day before departure for school site</li> <li>Students will enter the campus each day through an assigned gate to limit crowding at entry points</li> <li>Students will be administered a temperature check via a no-touch thermometer (temperature not to exceed 99.4) and symptom/contact screening daily upon arrival by staff</li> </ol> </li> </ul>	Site Principal Health Technicians Supervisory Staff	Upon return to in-person
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parent/guardian arrives.

		T	
0	Students who indicate a positive symptom will be excused from school,		
	referred for testing, and advised to isolate at home while awaiting test		
	results		
0	Students who have traveled out of state will be required to quarantine for		
	14 days		
0	Students transitioning to Extended Care after school will be administered		
	an additional screening by Extended Care staff		
1b Staff scree	ning	Site Principal	
All state	ff are asked to self-screen each day before arriving on-site. Staff should stay	Office Manager	8/3/20
home i	f they exhibit any of the following:	Health Technician	
0	Temperature of 99.5 or higher	Extended Care Site Leaders	
0	In the last 24 hours, you or anyone you live with have exhibited symptoms		
	such as a cough, sore throat, fever, gastrointestinal/stomach pain, vomiting,		
	diarrhea, flu-like symptoms, or sudden loss of taste or smell		
0	You have been in contact with anyone who has tested positively for		
	COVID-19		
0	All School Staff will be screened for temperature via no-touch thermal		
	scanner (temperature not to exceed 99.4) and symptoms by designated		
	staff daily upon arrival		
0	Staff who indicate a positive symptom will be excused from work, referred		
	for testing, and advised to isolate at home while awaiting test results		
0	Staff who indicate contact with anyone who has tested positively for		
	COVID-19 will be excused from work, referred for testing, and will be		
	required to quarantine for 10 days from the last known date of exposure		
1c Visitor scre	<u>e</u>	Site Principal	8/3/20
	nteers will be limited to only those needed for essential school functions	Office Manager	
	itors will be screened for both temperature and symptoms/contact/travel by	Health Technician	
	personnel upon arrival		
0	Any visitor or volunteer who answers affirmatively to any symptom or		
	contact question will not be permitted entrance to the school site, will be		
	provided with information on Covid-19, and encouraged to test and isolate		
	udents and staff		
	vill be trained in identifying symptoms of illness and procedures in case of		Upon return to in-person
	pment of symptoms		instruction
Studen	nts will be visually assessed by teacher after returning from lunch each day		

0 C. 1 1		
Students who appear to exhibit symptoms will be isolated and referred to		
the Health Clerk for further assessment		
Students will be educated in symptom recognition and instructed to report to		
nearest adult if developing symptoms during school day		
<ul> <li>Staff and students will participate in on-site asymptomatic Covid-19 testing on the</li> </ul>		
following cadence:		
$\circ$ CR > 14 – Symptomatic and response testing plus weekly asymptomatic		
PCR testing		
<ul> <li>Purple/Red Tier: Symptomatic and response testing plus every 2 weeks</li> </ul>		
asymptomatic testing		
<ul> <li>Orange/Yellow Tier: Symptomatic and response testing</li> </ul>		
3. Support ill students and staff	Coordinator, Safety	8/3/20
<ul> <li>3. Support ill students and staff</li> <li>Any individual referred for testing or experiencing illness will be contacted by a</li> </ul>	Coordinator, Safety Site Principals	8/3/20
		8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> <li>Students referred for testing will access the hybrid at-home learning instruction as able.</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> <li>Students referred for testing will access the hybrid at-home learning instruction as able.</li> <li>If a student has extended illness spanning more than 10 consecutive</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> <li>Students referred for testing will access the hybrid at-home learning instruction as able.</li> <li>If a student has extended illness spanning more than 10 consecutive instructional days, site administrators will work with parents to determine</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> <li>Students referred for testing will access the hybrid at-home learning instruction as able.</li> <li>If a student has extended illness spanning more than 10 consecutive</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> <li>Students referred for testing will access the hybrid at-home learning instruction as able.</li> <li>If a student has extended illness spanning more than 10 consecutive instructional days, site administrators will work with parents to determine if the student will remain in the current program or if a change in program placement is indicated.</li> </ul>	Site Principals	8/3/20
<ul> <li>Any individual referred for testing or experiencing illness will be contacted by a district liaison for coordination of services and information</li> <li>Students referred for testing will access the hybrid at-home learning instruction as able.</li> <li>If a student has extended illness spanning more than 10 consecutive instructional days, site administrators will work with parents to determine if the student will remain in the current program or if a change in program</li> </ul>	Site Principals	8/3/20

# 7. Plan for When a Staff Member, Student, Visitor Becomes Sick or is exposed to COVID-19

- 1. Include health office procedures for ill students
- 2. Involve HR for ill staff and visitors
- 3. Support district liaison communication with VCPH, use of VCPH Share Point site for local guidance, and use of the <a href="mailto:covidschools@ventura.org">covidschools@ventura.org</a> email

eman		
Plan:	Person(s) responsible	Date of Implementation
1. Ill/Exposed Students	Site Health Technicians	
• The following steps will be taken for any students identified as symptomatic	District Nurse	Upon return to in-person
<ul> <li>Student will be isolated in designated COVID-19 Triage area</li> </ul>	Site Principals	instruction
<ul> <li>Health Technician attending student will don full-body PPE</li> </ul>	_	
<ul> <li>Student will be required to wear a provided medical mask</li> </ul>		
<ul> <li>Student will be screened by site Health Technician</li> </ul>		

			1
0	If student is exhibiting Covid-19 like symptoms or illness parent/guardian		
	will immediately be contacted and student will be isolated until their		
	arrival		
0	Parent/Guardian will be contacted by a district liaison for coordination of		
	testing and quarantine.		
0	District testing will be offered to the student.		
0	Student will be required to provide a negative test result via district		
	provided or community testing and be fever free without use of		
	fever-reducing medication or provide medical documentation of a		
	confirmed alternative diagnosis and be symptom-free for a minimum of		
	24 hours before returning to school		
0	If student had been present at school prior to presentation of symptoms,		
	classrooms affected will be disinfected per current health guidelines		
0	OPUSD will comply with all county and state reporting requirements for		
	ill students		
0	District nurse will consult with VCPH to determine need for quarantine		
	of student's Stable Group, class, or other close contacts		
0	Students with known exposure to a positive Covid-19 case will quarantine		
	for 10 days from exposure date, provide a negative Covid-19 test or be		
	cleared by VCPH and be symptom free before returning to school.		
0	All staff members on site will be notified of the potential of exposure and		
	provided with information on health and sanitation procedures and		
	applicable benefits available to those affected by Covid-19.		
0	All notifications will comply with privacy requirements of FERPA and/or		
	HIPAA		
0	Students traveling out of state will be required to quarantine for 14 days		
	prior to returning to campus		
0	Union Representatives will be informed of the site locations where the		
	positive student worked during the infectious period		
2. Ill/Expose		Site Health Technicians	
_	llowing steps will be taken for any staff identified as symptomatic or	District Nurse	8/3/20
expose		Site Principals	
0	Staff will be directed to return home, isolate, and test	Coordinator, Safety	
0	Staff will be contacted by a district liaison for coordination of testing and	_	
	quarantine.		
	•	•	

1			T	T
	0	Staff will be offered District provided testing.		
	0	Human Resources will be informed and address need for information and		
		Family Leave		
	0	Staff member will be required to provide a negative test result and be		
		fever free without use of fever-reducing medication or provide medical		
		documentation of a confirmed alternative diagnosis and be symptom-free		
		for a minimum of 24 hours before returning to school		
	0	If staff member had been present at school prior to presentation of		
		symptoms, classrooms affected will be disinfected per current health		
		guidelines		
	0	OPUSD will comply with all county and state reporting requirements for		
		ill staff members		
	0	District nurse will consult with VCPH to determine need for quarantine		
		of classroom Stable Group or other close contacts		
	0	Staff members with known exposure to a positive Covid-19 case will		
		quarantine for 10 days from exposure date, provide a negative Covid-19		
		test or be cleared by VCPH, and be symptom free before returning to		
		school.		
	0	All staff members on site will be notified of the potential of exposure and		
		provided with information on health and sanitation procedures and		
		applicable benefits available to those affected by Covid-19.		
	0	All notifications will comply with privacy requirements of FERPA and/or		
		HIPAA		
	0	Union Representatives will be informed of the site locations where the		
		positive individual worked during the infectious period		
4.	Support d	istrict liaison communication with VCPH, use of VCPH Share Point		
	site for lo	cal guidance, and use of the covidschools@ventura.org email	District Liaisons	8/3/20
	<ul> <li>District liaison is enabled to work directly with VCPH and develop protocols and</li> </ul>			
practices in response to VCPH guidance				
5.		ication Plan		
		llowing steps are taken in the event an infectious individual is identified as		
	being p	present on a OPUSD site		
	0	All staff members and families will be notified of the potential for		
		exposure and given information about symptoms and sanitization		
		procedures via regular LEA communication systems		

	1	1
o Any individual (staff, student, visitor) who has been identified as a close		
contact with the Covid-19 positive individual will be instructed to		
quarantine as required by VCPH guidelines		
o Individuals identified as close contacts will be offered an on-site Covid-19		
test via our on-site testing and given information about local testing		
facilities		
<ul> <li>LEA will comply with local reporting requirements to VCPH via online</li> </ul>		
reporting system		
8. Maintain Healthy Operations - Surveillance and Reporting		
Describe your plan to standardize surveillance monitoring and reporting process based on	VCPH guidance.	
Plan:	Person(s) responsible	Date of Implementation
<ul> <li>Students sent home for Covid related illness or symptoms will be logged in SIS</li> </ul>	Attendance Clerks	
and reported to District Nurse		
Staff sent home for Covid related illness or symptoms will be reported to District	Office Manager	
Coordinator for Safety and Asst. Super. for Human Resources		
District Coordinator for Safety will keep a log of all staff members reporting	Site Principal	
symptoms, contact, or confirmed Covid illness	_	
District Nurse will keep a log of all students reporting symptoms, contact, or	Coordinator, Safety	
confirmed Covid illness		
<ul> <li>Confirmed cases of Covid-19 will be reported to District Coordinator for Safety</li> </ul>	District Nurse	
and/or District Nurse for contact tracing and appropriate reporting to VCPH.		
9. Consideration for Partial or Total Closure		
Describe your plan to:		
1. Communicate with VCPH prior to any school closure*		
2. Communicate school closures with families and staff		
3. Maintain continuity of education through distance learning or other means of non-clas	sroom-based instruction*	
*Note: Any decision to close a portion of or the entire schools should be n	ade in consultation with VCPH	
Plan:	Person(s) responsible	Date of Implementation
1. Coordinator for Safety and District Superintendent will contact VCPH in the case		
of the following and prior to any school closure		
a. Multiple (more than 3) cases at a single school		
b. If 5% or more of the staff/student/teacher population are positive cases		
2. Any school closure determined to be necessary in coordination with VCPH		
would be communicated via ParentSquare communication app, call to phone		
number of record, and email to staff.		

3. In case of school or district closure, academic instruction would revert to Distance Learning option until school is deemed safe to reopen in consultation	District Superintendent	8/3/20
with VCPH		
10. Strategic Recovery Planning Team (Optional)		
Describe your plan to designate a team to periodically update current plan, based on revis	ed local and/or state guidance. To	eam will include designated
district liaisons.	<u> </u>	
Plan:	Person(s) responsible	Date of Implementation
• This plan will be reviewed and updated as necessary on the 15th of each month	, , =	-
after approval.	Coordinator of Safety	
<ul> <li>Members of the Mitigation Team are as follows:</li> </ul>		
<ul> <li>District Coordinator of Safety/District Liaison - Holly Baxter</li> </ul>		
<ul> <li>District Nurse/District Liaison - Allie Levine</li> </ul>		
<ul> <li>District Superintendent - Tony Knight</li> </ul>		
<ul> <li>Asst. Sup., Business and Administrative Services - Adam Rauch</li> </ul>		
<ul> <li>Asst. Sup., Human Resources - Stew McGugan</li> </ul>		
O Director, Operations - Brendan Callahan		
Director, Curriculum and Instruction - Jay Greenlinger		
O Director, Pupil Services - Susan Roberts		
<ul> <li>Director, Extended Care Programs - Sara Ahl</li> </ul>		
	•	•

Plan has been reviewed for alignment with VCPH Guiding Principles and VCOE Framework on \_\_\_\_\_(date).

COE Internal:	
Date Received:	Date Reviewed:
Date sent to VCPH:	
Date of confirmed receipt by VCPH:	

This plan will be completed by each district and charter school in Ventura County by no later August 5, 2020. Plans will be emailed to Dawn Anderson daanderson@vcoe.org and Antonio Castro acastro@vcoe.org.



# **COVID-19 PREVENTION PROGRAM**

# COVID-19 Prevention Program (IIPP) for Oak Park Unified School District

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# 1. Purpose

a. In an effort to protect the health and safety of our employees, OPUSD has prepared this COVID-19 Prevention Program ("CPP") intended to provide information related to the prevention of coronavirus, describe procedures and safe practices to keep employees and students safe and to help prevent the spread of coronavirus in the workplace.

# 2. Scope

- a. This program applies to all employees and contains general prevention and best practices as well as procedures related to COVID-19 in the workplace.
- b. This program can also be implemented during a declared outbreak, epidemic, or pandemic of other infection disease for which public health officials have issued guidelines and recommendations.
  - 1) Including H1N1 influenza (swine flu), H5N1 influenza (avian flu), Norovirus, Methicillin Resistant Staphylococcus Aureus (MRSA) and Tuberculosis
- c. This program can help keep staff healthy during an outbreak including during cold and flu season.
- d. This program does not apply to employees while working from home.

# 3. Authority and Responsibility

- a. Program Manager
  - 1) Holly Baxter, OPUSD Coordinator Safety and Equity, has overall authority and responsibility for implementing the provisions of this CPP in our workplace.
- b. In addition, all site administrators, 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.
- c. Employee Responsibilities
  - 1) All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.
  - 2) Employees must immediately report any symptoms of COVID-19 they experience whether the symptoms developed while at work or elsewhere. Employees must also promptly disclose positive COVID-19 tests.
  - 3) An employee must stay home if they are sick, follow public health agency guidelines, and contact their supervisor or manager for further instructions.
  - 4) Employees must cooperate with any investigation related to the onset of illness, date of symptoms, others with whom the employee had close contact, and coronavirus testing among other topics.

#### 4. Definitions

- a. COVID-19 Case: a person who:
  - 1) Has a positive "COVID-19 test" as defined,
  - 2) Is subject to COVID-19-related order to isolate issued by a local or state health official, or
  - 3) Has died due to COVID-19, in the determination of a Ventura County Public Health Department or is included in the COVID-19 statistics of Ventura County.

- b. COVID-19 Exposure: being within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" as defined.
  - 1) This definition applies regardless of the use of face coverings.
- c. COVID-19 Test: a viral test for SARS-CoV-2 that is:
  - 1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and
  - 2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.
- d. High-Risk Exposure Period:
  - 1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or
  - 2) For persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected

#### e. Outbreak:

- 1) When there are three or more COVID-19 cases in an exposed workplace within a 14-day period, or
- 2) A place of employment that has been identified by Ventura County Public Health Department as the location of a COVID-19 outbreak.
- 3) An outbreak ends when there are no new COVID-19 cases detected in a workplace for a 14-day period.
- 4) For workers' compensation purposes:
  - a) the employer has 100 employees or fewer at a specific place of employment, 4 employees test positive for COVID-19;
  - b) If the employer has more than 100 employees at a specific place of employment, 4 percent of the number of employees who reported to the specific place of employment, test positive for COVID-19; or
  - c) A specific place of employment is ordered to close by Ventura County Public Health Department (VCPH), the California Department of Public Health (CDPH), the Division of Occupational Safety and Health (Cal/OSHA), or a school superintendent/charter school administrator due to a risk of infection with COVID-19.
- f. Major Outbreak: when there are 20 or more COVID-19 cases in an exposed workplace within a 30-day period.

- 1) A major outbreak ends when there are no new COVID-19 cases detected in a workplace for a 14-day period.
- g. Protective wear includes face coverings and equipment typically considered personal protective equipment

# h. Workplace

- 1) Any work location, working area, or common area at work, including restrooms, walkways, hallways, aisles, break or eating areas, and waiting areas.
- 2) the building, store, facility, agricultural field, or other location where a worker worked during the infectious period.
  - a) It does not apply to buildings, floors, or other locations of the employer that a COVID-19 case did not enter.
- 3) Examples: Schools, school buildings, offices, office buildings, maintenance and operations facilities, transportation facilities, and other local educational agency facilities

# 5. System for Communicating

- a. OPUSD will ask employees to report the following:
  - 1) COVID-19 symptoms,
  - 2) Possible COVID-19 exposures, and
  - 3) Possible COVID-19 hazards at the district or school sites.
- b. Provide information regarding procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- c. Provide information about access to COVID-19 testing.
  - 1) If testing is required by state law, regulation, or state or local public health order, the district or charter school shall inform affected employees of the reason for the COVID-19 testing and the possible consequences of a positive test.
- d. Communicate information about COVID-19 hazards and the employer's COVID-19 policies and procedures to employees and to other employers, persons, and entities within or in contact with the employer's workplace.
  - 1) Give notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
    - a) All employees who may have had COVID-19 exposure and their authorized representatives.
    - b) Independent contractors and other employers present at the workplace during the high-risk exposure period.

- 2) Effective January 1, 2021,
  - a) OPUSD will provide a written notice to all employees, and the employers of subcontracted employees, who were on the premises at the same worksite as the qualifying individual within the infectious period that they may have been exposed to COVID-19, in a manner the employer normally uses to communicate employment-related information.
  - b) Provide a written notice to the exclusive representative, if any, of employees who have received notification.
  - c) Notification must include information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
    - FFCRA (Families First Coronavirus Response Act.)
    - FMLA/CFRA (Family Medical Leave Act/California Family Rights Act Leave)
    - Available Sick Leave/ Paid Time Off (PTO)
    - Negotiated leave provisions
    - Workers Compensation
  - d) Notification must include information on the disinfection and safety plan that the employer plans to implement and complete per the guidelines of the federal Centers for Disease Control.
  - e) Send notification of a COVID-19 outbreak, as defined by the CDPH within 48 hours, to VCPH the notification must include:
    - Names, number, occupation, and worksite of employees who meet the definition in subdivision of a qualifying individual.
    - The business address and NAICS code of the worksite where the qualifying individuals work.
    - Employer shall continue to give notice to the VCPH of any subsequent laboratory-confirmed cases of COVID-19 at the worksite.
    - The notice shall contain the same information as would be required in an incident report in a the Cal/OSHA Form 300 injury and illness log unless the information is inapplicable or unknown to the employer.

# 3) Confidentiality

- a) Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by the OPUSD shall be provided in a manner that ensures the confidentiality of employees.
  - Exception: Unredacted information on COVID-19 cases shall be provided to the VCPH, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law immediately upon request.

- b) Ensure that all employee COVID-19 medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace.
  - EXCEPTION 1: Unredacted medical records shall be provided to the VCPH, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request.
  - EXCEPTION 2: This provision does not apply to records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.
- e. If a staff member is exposed to COVID-19, they should:
  - 1) Call in sick, notifying their supervisor/HR
  - 2) Self-quarantine at home for 14 days
  - 3) Discuss possible exposure to co-workers
- f. When a staff member becomes sick at school or the office:
  - 1) Staff member should be sent home immediately
  - 2) Staff member should monitor their health
  - 3) Call in sick as necessary.
- g. Employees that return to work following an illness promptly report any recurrence of symptoms
- 6. Identification and evaluation of COVID-19 hazards
  - a. OPUSD takes seriously its obligation to locate, identify and correct potential COVID-19 hazards in the workplace. The following will be implemented:
    - 1) Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and VCPH related to COVID-19 hazards and prevention.
    - 2) Conduct workplace-specific evaluations using the Identification of COVID-19 Hazards forms.
    - 3) Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
    - 4) Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
    - 5) Conduct periodic inspections using the COVID-19 Inspections form.
      - a) Inspections will be monthly
  - b. Employee Participation
    - 1) Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- a) Making recommendations for improvement for evaluation and control of COVID-19 hazards.
  - Employees may use their name or remain anonymous.
- c. Employee screening
  - 1) We screen our employees by:
    - a) Taking temperatures upon arrival with non-contact thermometers.
      - face coverings will be used during screening by both screeners and employees
    - b) Employees will certify on self-screen forms they have not had or done any of the following:
      - Fever 99.5 or above in the past 24 hours;
      - Cough or other respiratory symptoms;
      - Other symptoms related to COVID-19,
      - COVID-19 Exposure, as defined,
      - Travel out of the state or country.
    - c) Self-screening via smartphone application.
- 7. Investigating and responding to COVID-19 cases in the workplace
  - a. The following procedures shall be taken in advance of a report of a COVID-19 case and after their report to help identify employees who may have been exposed:
    - 1) To facilitate contact tracing, employees will sign in and out when visiting a department that is not their own.
    - 2) When a report is made of a positive test of symptoms identified by a health care professional, the COVID-19 case will be excluded from the worksite and interviewed to establish:
      - a) Dates they have been at the work site
      - b) Dates COVID-19 Case tested positive or first experience symptoms
      - c) With whom they have been in contact
      - d) What other work sites they may have visited
    - 3) Determine who may have been exposed
      - a) Review sign in logs
      - b) Consider COVID-19 Case primary worksite
      - c) Review report for additional locations
  - b. Responding to COVID-19 cases
    - 1) COVID19 cases and exposed employees and students will be excluded in accordance with sections 14 and 15 of this program.

- 2) Notify all staff who have been at the worksite with the qualified individual during the infectious period in accordance with Section 5, System for Communicating.
- 3) Offer COVID-19 tests to employees who were exposed at the worksite
  - a) Exposed employees
    - Testing provided at no cost to the employees
    - provided during working hours
    - all information received in connection with testing and reporting shall be kept confidential except for reports to VCPH as required.
  - b) Other employees will be directed to VCPH testing sites.
- 4) Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards in accordance with Section 6 of this program.
- 5) Hazard correction will occur in accordance with Section 8 of this program and paragraph 16.e.3), if applicable.
- 6) Clean and disinfect all areas the qualified individual has been to help prevent the spread of the virus in accordance with paragraph 12.b.6) of this program.
- 7) Notification to VCPH will be sent according to paragraph 13.a.1) of this program and paragraph 16.f., if applicable.
- 8) Notification to Cal/OSHA will be sent according to paragraph 13.a.2) of this program, if applicable.
- 9) All employee COVID-19 Cases will be reported to the workers' compensation claims administrator, Annette Segal.
  - a) Use the COVID-19 Positive Test Report from the workers' compensation claims administrator

#### 8. Correction of COVID-19 hazards

- a. Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards.
- b. Hazards shall be corrected according to the following procedures:
  - 1) When observed or discovered; and
  - 2) Corrected in a timely manner based on the severity of the hazards
- c. Hazard correction is implemented through:
  - 1) Maintenance work orders
  - 2) Purchasing of necessary cleaning and sanitizing supplies, restroom supplies, hand sanitizer, and/or sanitizing wipes;
  - 3) Training and instruction
  - 4) Direct, verbal or written communication with employees and when necessary.

# 9. Training and instruction

- a. Training and instruction will include the following:
  - 1) OPUSD COVID-19 policies and procedures to protect employees from COVID-19 hazards
  - 2) Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
    - a) This includes any benefits available:
      - FFCRA (Families First Coronavirus Response Act.)
      - FMLA/CFRA (Family Medical Leave Act/California Family Rights Act Leave)
      - Available Sick Leave/ Paid Time Off (PTO)
      - Negotiated leave provisions
      - Workers Compensation
  - 3) COVID-19 transmission:
    - a) The fact that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales;
    - b) that COVID19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common;
    - c) that an infectious person may have no symptoms.
  - 4) Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
  - 5) 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.
  - 6) 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.
  - 7) Proper use of face coverings and the fact that face coverings are not respiratory protective equipment.
  - 8) COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has COVID-19 symptoms.

#### 10. Physical distancing

- a. All employees, students, and visitors will be separated from other persons by at least six feet,
  - 1) Exception: momentary exposure while persons are in movement.
  - 2) Exception: where it can demonstrate that six feet of separation is not possible.

- b. Methods of physical distancing include:
  - 1) Telework or other remote work arrangements, if practical;
  - 2) Reducing the number of persons in an area at one time, including students and visitors;
  - 3) Stanchions with straps or chains used to delineate physical distances.
  - 4) Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel;
  - 5) One-directional hallways;
  - 6) When a conference room, classroom, or office has two doors, one will be designated an entrance and the other will be designated as the exit
  - 7) Staggered arrival, departure, work, and break times.
- c. When it is not possible to maintain a distance of at least six feet, individuals shall be as far apart as possible.

# 11. Face coverings

- a. OPUSD will provide face coverings and ensure they are worn by employees, students, and visitors over the nose and mouth when indoors and when outdoors and less than six feet away from another person.
- b. A face covering is worn over the nose and mouth, not under the nose or under the chin.
  - 1) Centers for Disease Control and Prevention (CDC) **does not recommend** using masks with exhalation valves or vents because this type of mask may not prevent a person from spreading COVID-19 to others.
    - a) The hole in the material caused by the valve or vent may allow respiratory droplets to escape and reach others.
- c. Face coverings are to be clean and undamaged.
- d. Face shields are not a replacement for face coverings, although they may be worn together for additional protection.
- e. Exemptions for wearing face coverings include:
  - 1) When an employee is alone in a room;
  - 2) While eating and drinking, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible;
  - 3) Employees wearing respiratory protection in accordance with a written Respiratory Protection Program or other written program required by Cal/OSHA;
  - 4) 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;
  - 5) Specific tasks which cannot feasibly be performed with a face covering.

- a) This exception is limited to the time period in which such tasks are actually being performed,
- b) Example: because of difficulty breathing during high intensity activities in departments such as maintenance, grounds, custodial.
- c) The unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.
- f. Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability will wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it
- g. 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.
- h. Any employee may wear a face covering when not required by a law, regulation, or health order, unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- i. Signs will be posted at each entrance to communicate to non-employees the face coverings requirements on the premises.
- 12. Other engineering controls, administrative controls, and personal protective equipment
  - a. Engineering Controls
    - 1) To the extent feasible, the quantity of outside air for buildings with mechanical or natural ventilation systems will be enhanced by:
      - a) The heating ventilation and air conditioning (HVAC) system is adjusted to allow maximum outside air.
      - b) The HVAC system air filters will be upgraded to the highest efficiency compatible with the system.
        - Maximum Efficiency Reporting Value (MERV) 13 or 14 are recommended when feasible.
      - c) Opening doors and windows when weather permits, and the outdoor Air Quality Index is less than 100.
    - 2) Solid, clear partitions are installed to enhance, not replace, physical distancing.
    - 3) Administrative Controls and Safe Practices
    - 4) Working remotely, when feasible.
    - 5) Meeting remotely.
    - 6) Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
    - 7) Scheduled and Periodic Cleaning and Disinfecting

- a) Frequently touched surfaces at offices, classrooms and on school buses are to be cleaned and disinfected at least daily and, as practicable, these surfaces should be cleaned and disinfected frequently throughout the day by trained custodial staff.
- b) Frequently touched surfaces in the school include, but are not limited to:
  - Door handles,
  - Light switches,
  - Sink handles,
  - Restroom surfaces,
  - Tables and desks,
  - Chairs,
  - Playground equipment
- c) Only disinfecting products approved for use against COVID-19 on the Environmental Protection Agency (EPA)- approved list "N" will be used.
- d) Shared tools and equipment
  - Items that employees come in regular physical contact with, such as telephones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible.
  - Where there must be sharing, such as photo copiers, the items will be disinfected between uses by each person after use.
  - Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.
- 8) Cleaning and Disinfecting after a COVID-19 case
  - a) The area used by the COVID-19 case will be closed off from use.
  - b) Doors and windows will be opened, if possible, to increase air circulation.
  - c) The affected area will be left vacant for 24 hours or as long as possible before cleaning.
  - d) All areas used by the COVID-19 case will be cleaned and disinfected.
    - Offices, classrooms, restrooms, common areas, shared electronic equipment, photo copiers, touch screens, keyboards, etc.
  - e) Only disinfecting products approved for use against COVID-19 on the Environmental Protection Agency (EPA)- approved list "N" will be used.
  - f) Soft surfaces will be misted using an electrostatic sprayer or vacuumed with a vacuum equipped with a HEPA filter.
  - g) If more than seven days since the COVID-19 case visited or used the affected area, additional cleaning and disinfection is not necessary.

# 9) Healthy Hygiene Practices

- a) An adequate number of restrooms with sinks and soap will be provided per the California Plumbing Code.
  - Areas without soap and water will be provided with hand sanitizer
- b) Employees and students are encouraged to wash their hands frequently throughout the day, including:
  - Before and after eating;
  - After coughing or sneezing;
  - Before and after using the restroom;
  - After classes where they handle shared items such as art or career technology.
- c) Employees and students are encouraged to wash their hands for 20 seconds with soap, rubbing thoroughly after application.
  - Note: frequent handwashing is more effective than the use of hand sanitizers.
  - Soap products marketed as "antimicrobial" are not necessary or recommended.
- d) Employees and students are encouraged to use fragrance-free hand sanitizer when handwashing is not practicable.
  - Sanitizer must be rubbed into hands until completely dry.
  - Sanitizer containing methanol (methyl alcohol) is prohibited.
- e) Employees and students are encouraged to avoid contact with one's eyes, nose, and mouth.
- f) Employees and students are encouraged to use tissue to wipe their nose and to cough/sneeze inside a tissue or their elbow.
- g) Any employees exhibiting symptoms should immediately be required to wear a face covering and should go home or to a healthcare facility, as soon as practicable
- h) Any students exhibiting symptoms should immediately be required to wear a face covering and be required to wait in an isolation area until they can be transported home or to a healthcare facility, as soon as practicable.

#### b. Personal Protective Equipment

- 1) Personal protective equipment will not be shared.
- 2) Protective gloves:
  - a) Nurses, health technicians, and/or office staff attending ill or injured students or assisting with medical needs of special education students.
  - b) Custodians and other employees who use cleaning and sanitizing products, other than surface wipes.

c) Special education teachers and paraeducators who assist students with personal needs or assisting with medical needs of special education students.

# 3) Goggles or safety glasses

- a) Nurses, health technicians, and/or office staff attending ill or injured students or assisting with medical needs of special education students.
- b) Custodians and other employees who use cleaning and sanitizing products, other than surface wipes.
- c) Special education teachers and paraeducators who assist students with personal needs or assisting with medical needs of special education students.

#### 4) Face shields

- a) To enhance the effectiveness of goggles, safety glasses, or face coverings.
- b) Staff who are hearing-impaired or communicating with a hearing-impaired person.
- c) Employees who cannot wear face coverings due to a medical or mental health condition or disability.
  - The face shield must have a drape on the bottom

# 5) Respiratory protection

- a) As supply allows, N 95 filtering face masks will be available for voluntary use to Nurses, health technicians, and/or office staff attending ill or injured students.
- b) Respiratory protection will be provided according to the OPUSD written respiratory protection program in the following situations:
  - The physical distancing requirements are not feasible with special education students who cannot wear face coverings due to a medical or mental health condition or disability.
  - During procedures for special education students that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

# 13. Reporting, recordkeeping, and access

#### a. Reporting

- 1) Report information about COVID-19 cases at our offices and schools to the VCPH whenever required by health order, and provide any related information requested by the VCPH.
  - a) School Portal for Outbreak Tracking (SPOT)
- 2) Report immediately, but not more than eight hours, to Cal/OSHA any COVID-19-related serious illnesses or death, as defined, of an employee occurring in our offices and schools or in connection with any employment.

a) "Serious illness" means any illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing.

# b. Recordkeeping

- 1) Maintain records of the steps taken to implement our written COVID-19 Prevention Program including the following:
  - a) A log of written notifications to employees, authorized employee representatives, and VCPH.
    - Sample letters will also be maintained.
  - b) Use the "VCPH Initial Screening Form" to keep a record of and track all COVID-19 cases
  - c) Identification of COVID-19 Hazards form
  - d) COVID-19 Inspections form
  - e) Documentation that hazards are corrected,
  - f) Employee training and instruction
- 2) These records will be maintained at least three years.

#### c. Access

- 1) Make this written COVID-19 Prevention Program available at the offices and schools to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- 2) The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

#### 14. Exclusion of COVID-19 cases

- a. Where there is a COVID-19 case at OPUSD, transmission will be limited by:
  - 1) Ensure that COVID-19 cases are excluded from the workplace or classroom until the return-to-work criteria are met;
  - 2) Exclude employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case;
    - a) To reduce exposure to employees, students with COVID-19 exposure will be excluded from the classroom for 14 days after the last known COVID-19 exposure to a COVID-19 case.
  - 3) Continue and maintain an employee's earnings, seniority, and all other employee rights and benefits whenever it is demonstrated that the COVID-19 exposure is work related;
  - 4) Providing employees at the time of exclusion with information on available benefits, as described in section 5 of this program.

#### 15. Return to work criteria

- a. COVID-19 cases with COVID-19 symptoms shall not return to work until:
  - 1) At least 24 hours have passed since a fever of 99.5 or higher has resolved without the use of fever-reducing medications;
  - 2) COVID-19 symptoms have improved; and
  - 3) At least 10 days have passed since COVID-19 symptoms first appeared.
- b. COVID-19 cases who tested positive but never developed COVID-19 symptoms shall not return to work until:
  - 1) A minimum of 10 days have passed since the date of specimen collection of the first positive COVID-19 test.
- c. A negative COVID-19 test will not be required for an employee to return to work.
- d. 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.
  - 1) 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.
- e. During declared travel restrictions, employees and students will self-quarantine for 14 days following travel outside the state or country.

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

- a. This section applies to a place of employment covered by this program if it has been identified by a VCPH as the location of a COVID-19 outbreak or when there are three or more COVID-19 cases in an exposed workplace within a 14-day period.
  - 1) This section will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

#### b. COVID-19 testing

- 1) LEA will provide COVID-19 testing to all employees at the exposed workplace except for those not at work during the outbreak or the relevant 14 days. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- 2) COVID-19 testing consists of the following:
  - a) Employees in an 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 VCPH.
  - b) After the first two COVID-19 tests, COVID-19 testing will continue for employees who remain at the workplace at least once per week, or more frequently if recommended by the VCPH, until there are no new COVID-19 cases detected in the workplace for a 14-day period.
  - c) We will provide additional testing when deemed necessary by Cal/OSHA

- c. Exclusion of COVID-19 cases
  - 1) LEA will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with Sections 14 and 15 of this program.
    - a) Or as ordered by the local health officer if applicable
- d. Investigation of workplace COVID-19 illness
  - 1) An investigation will commence immediately to determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with Section 7 of this program.
- e. COVID-19 investigation, review and hazard correction
  - 1) Investigation and review
    - a) In addition to Sections 6 of this program, 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;
      - Leave policies and practices and whether employees are discouraged from remaining home when sick;
      - COVID-19 testing policies;
      - Air supply, outside and filtered;
      - Physical distancing
      - Use of face coverings.
  - 2) Review Updates
    - a) Every thirty days that the outbreak continues.
    - b) In response to new information or to new or previously unrecognized COVID-19 hazards.
    - c) When otherwise necessary.
  - 3) Hazard Correction
    - a) Implementing changes to reduce the transmission of COVID-19 based on the investigation and review
    - b) In addition to corrections outlined in Section 8, 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, as described in paragraph 12.c.(5).

# f. Notifications to VCPH

- 1) Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in the workplace,
- 2) VCPH will be contacted for guidance on preventing the further spread of COVID-19 within the workplace.
- 3) Information provided to VCPH will include the total number of COVID-19 cases and for each COVID-19 case, the following:
  - a) The name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, of the COVID-19 cases
  - b) North American Industry Classification System code (6111) of the workplace of the COVID-19 case, and
  - c) Any other information requested by the VCPH.
- 4) We will continue to give notice to the VCPH of any subsequent COVID-19 cases at our workplace.

# 17. Major COVID-19 Outbreaks

- a. This section applies to any place of employment covered by this program when there are 20 or more COVID-19 cases in an exposed workplace within a 30-day period.
  - 1) This section will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

# b. COVID-19 testing

- 1) COVID-19 testing will be provided twice a week, or more frequently if recommended by VCPH, to all employees present at the exposed workplace during the relevant 30-day period(s) and who remain at the workplace.
- 2) COVID-19 testing will be provided at no cost to employees during employees' working hours

#### c. Exclusion of COVID-19 cases

- 1) OPUSD will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with Sections 14 and 15 of this program.
  - a) Or as ordered by the local health officer if applicable

# d. Investigation of workplace COVID-19 illnesses

1) An investigation will commence immediately to determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with Section 7 and paragraph 16.e. of this program.

#### e. COVID-19 hazard correction

1) Hazard correction will occur in accordance with Section 8 and paragraph 16.e.3) of this program.

- f. Notifications to VCPH
  - 1) Notification to VCPH will be sent according to paragraphs 13.a.1) and 16.f.