COVID-19 Prevention Program (CPP) for Escuela Popular

Date: March 2021

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

Authority and Responsibility

The Executive Director 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

- Evaluate employees’ potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the Appendix B: COVID-19 Inspections form as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by reporting any identified COVID-19 hazards to their immediate supervisor.

Employee screening

Employees have one entrance where health screening is conducted. Health screening consists of a temperature check with a non contact thermometer and screening questions are asked. All visitors and employees must wear face coverings at all times when on campus.

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. Staff conducts weekly walk-throughs to identify any COVID-19 hazards. Corrections are addressed within 24 hours after being notified.

Control of COVID-19 Hazards
Physical Distancing
Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

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

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

Face Coverings
We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. Face coverings are available to all employees, students, and visitors that check-in at our designated Health Stations. No employee, student, or visitor will be allowed onto campus without a face covering.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.

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 have provided and installed screen protectors and sneeze guards for individuals who need to come into distance closer than six feet from each other.

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

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- The ventilation system is properly maintained and adjusted by the site facilities team. Our new building is a high efficiency ventilation system. It is maintained in accordance with recommended standards.
- Doors and windows are opened when appropriate and weather conditions permit.

Cleaning and disinfecting
We created the Covid-19 Custodial Best Practices for Administrators and Custodians. This document
informs the employees of the frequency and scope of cleaning and disinfection for frequently touched surfaces and should we have a COVID-19 case in our workplace. It is readily available for employees in the 2020-21 EP Staff Resource Site and on our website.

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 user with disinfecting wipes. We provide disinfecting wipes to employees.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

● Evaluated hand washing facilities and determined the need for additional facilities.
● Encourage and allow time for employee handwashing.
● Provide employees with an effective hand sanitizer, and prohibiting hand sanitizers that contain methanol (i.e. methyl alcohol).
● Encourage employees to wash their hands for at least 20 seconds before rinsing.
● Signage was posted at all our handwashing locations to remind employees to wash their hands regularly.

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.

● The ventilation system is properly maintained and adjusted by the site facilities team. Our new building has a high efficiency ventilation system. It is maintained in accordance with recommended standards.
● Doors and windows are opened when appropriate and weather conditions permit.

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:

● Contacted by the HR Generalist with guidance and next appropriate.
● Provided information regarding COVID-19 testing that is provided by our local County (Santa Clara County Public Health). Employees are also encouraged to test at our County Office of Education (Santa Clara County Office of Education) and if any expenses are incurred, the school will reimburse the employee.
● 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:

● All employees should report to HR immediately after detecting COVID-19 symptoms or receiving a positive COVID-19 test by contacting Cindy Cortes at cindy@escuelapopular.org or at (408)
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. 
Information regarding testing locations are shared with employees and community when possible exposures have been reported to HR. Testing locations have also been announced by administration as a resource for the entire school community.
In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible next steps due to a positive test. 
We implemented health stations and require all staff and visitors to wear face masks at all times while on campus and social distancing must be maintained, as well as hand sanitizers and handwashing stations are available for everyone.

Training and Instruction
We will provide effective training and instruction that includes:
Our COVID-19 guidelines and procedures to protect employees from COVID-19 hazards.
Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
The fact that:
COVID-19 is an infectious disease that can be spread through the air.
COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
An infectious person may have no symptoms.
Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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

Exclusion of COVID-19 Cases
Where we have a COVID-19 case in our workplace, we will limit transmission by:
Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
Continuing and maintaining an employee’s earnings, seniority, and all other employee rights and benefits whenever we have demonstrated that the COVID-19 exposure is work related. This will be accomplished by following the workers compensation claim process.
Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access procedures

THIS IS A LIVING DOCUMENT SUBJECT TO CONTINUOUS REVISION AND CORRECTION CONSISTENT WITH STATE AND LOCAL INDUSTRY GUIDANCE.
● 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 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 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:
  o At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  o COVID-19 symptoms have improved.
  o 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.

● All employees must comply with the COVID-19 Return To Work Protocols which are available on our 2020-21 EP Staff Resource Site.

Patricia Reguerin, Executive Director

3/24/2021
Appendix A: Identification of COVID-19 Hazards

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

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

**Person conducting the evaluation:**

**Date:**

**Name(s) of employee that participated:**

<table>
<thead>
<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</th>
<th>Places and times</th>
<th>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</th>
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Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

<table>
<thead>
<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<tr>
<td>Barriers/partitions</td>
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<tr>
<td>Ventilation (amount of fresh air and filtration maximized)</td>
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<tr>
<td>Additional room air filtration</td>
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<tr>
<td><strong>Administrative</strong></td>
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<tr>
<td>Physical distancing</td>
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<tr>
<td>Surface cleaning and disinfection (frequently enough and adequate supplies)</td>
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<td>Hand washing facilities (adequate numbers and supplies)</td>
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<tr>
<td>Disinfecting and hand sanitizing solutions being used according to manufacturer instructions</td>
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<tr>
<td><strong>PPE (not shared, available and being worn)</strong></td>
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<tr>
<td>Face coverings (cleaned sufficiently often)</td>
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<tr>
<td>Gloves</td>
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<tr>
<td>Face shields/goggles</td>
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<tr>
<td>Respiratory protection</td>
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Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees’ medical records will also be kept confidential and not disclosed or reported without the employee’s express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

Date:

Name of person conducting the investigation:

<table>
<thead>
<tr>
<th>Employee (or non-employee*) name:</th>
<th>Occupation (if non-employee, why they were in the workplace):</th>
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<tbody>
<tr>
<td>Location where employee worked (or non-employee was present in the workplace):</td>
<td>Date investigation was initiated:</td>
</tr>
<tr>
<td>Was COVID-19 test offered?</td>
<td>Name(s) of staff involved in the investigation:</td>
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<tr>
<td>Date and time the COVID-19 case was last present in the workplace:</td>
<td>Date of the positive or negative test and/or diagnosis:</td>
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<tr>
<td>Date the case first had one or more COVID-19 symptoms:</td>
<td>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</td>
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*This is a living document subject to continuous revision and correction consistent with state and local industry guidance.
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

<table>
<thead>
<tr>
<th>All employees who may have had COVID-19 exposure.</th>
<th>Date:</th>
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<tbody>
<tr>
<td>Names of employees that were notified:</td>
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<tr>
<th>Independent contractors and other employers present at the workplace during the high-risk exposure period.</th>
<th>Date:</th>
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<tr>
<td>Names of individuals that were notified:</td>
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<tr>
<th>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</th>
<th>What could be done to reduce exposure to COVID-19?</th>
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<tr>
<th>Was the local health department notified?</th>
<th>Date:</th>
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*Should an employer be made aware of a non-employee infection source COVID-19 status.*

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Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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