

Garden Grove Unified School District

COVID-19 Prevention Program

Date: December 2, 2022

This COVID-19 Prevention Program (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. The protocols outlined in this CPP are intended to supplement existing District policies and procedures, applicable collective bargaining agreements and memoranda of understanding with exclusive bargaining representatives, and relevant requirements imposed by state and local health agencies. It is applicable during the current COVID-19 public health emergency.

I. Authority and Responsibility

- A. Rosa Gonzalez, Business Services Director, has overall authority and responsibility for implementing the provisions of this CPP. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and responding to questions by employees about the CPP.
- B. All employees are responsible for using safe work practices, following all directives, policies and procedures, applicable collective bargaining agreements and memoranda of understanding with exclusive bargaining representatives, and assisting in maintaining a safe work environment.

II. Identification and Evaluation of COVID-19 Hazards

A. Workplace Hazards

The District has evaluated employees' potential workplace exposures and implemented applicable orders and general industry-specific guidance related to COVID-19 hazards and preventions. However, information is constantly changing and the District will continue to conduct periodic inspections as needed and implement corrections. Employees who identify a COVID-19 hazard are to report it to their immediate administrator/supervisor who will then take the necessary steps to correct the hazard if feasible and will communicate with the employee the action taken as long as the information doesn't violate confidentiality. **Logs will be kept at each individual site/department of reports and action taken.** Employees can report symptoms and hazards without fear of reprisal.

Documentation of vaccination status of our employees is conducted using **COVID-19 Vaccination Record through the Employee Information System (EIS)**, which is maintained as a confidential medical record.

B. Employee Self-Screening

- 1. Employees are required to comply with District policies, applicable collective bargaining agreements, applicable memoranda of understanding between the District and appropriate exclusive bargaining representatives, and the latest local public health directives to mitigate coronavirus risk to themselves and anyone visiting the work site. To this end, employees should evaluate their own symptoms before reporting to work, and must immediately report any symptoms of COVID-19 they experience whether the symptoms developed at work or elsewhere. Prior to reporting to work, employees should self-screen for COVID-19 symptoms and risk factors by asking themselves the following questions:

- (a) Have I had any signs or symptoms of a fever in the past 48 hours such as chills, sweats, felt “feverish” or had a temperature that is elevated for me/100.4°F or greater?
 - (b) Do I currently have (or, in the last 48 hours, have I had) any of the following symptoms?
 - Unexplained Headache
 - Cough
 - Sore Throat
 - Trouble breathing, shortness of breath or severe wheezing
 - Chills
 - New loss of taste and/or smell, or a change in taste
 - Gastrointestinal Issues (nausea, vomiting, diarrhea)
 - Fever of 100.4 F or above, or possible fever symptoms like alternating chills and sweating
 - Myalgia (Body/Muscle Aches)
 - (c)
 - (d) Do I currently have any of the following possible emergency symptoms?
 - Struggling to breathe or fighting for breath even while inactive or when resting?
 - Feeling about to collapse every time you stand or sit up?
2. If employees answer yes to the questions above, the employee should contact his/her immediate supervisor to notify their symptoms or exposure.
 3. If an employee starts feeling sick and/or experiencing symptoms of illness associated with the COVID-19 virus during the work day, the employee is required to:
 - (a) Immediately report the symptoms to your supervisor and/or to Office of Personnel.
 - (b) Your supervisor and/or Office of Personnel will direct you to leave work.
 - (c) Avoid close contact with other employees while at and when leaving the workplace.
 4. Employees must cooperate with the District in 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. The investigation will help the District identify employees who may have been exposed and provide quarantine procedures to them so there is no further workplace exposure.

III. Control of COVID-19 Hazards

The District implements reasonable guidelines to mitigate employee exposure to the coronavirus in the workplace as follows:

A. **Face Coverings**

We provide clean, undamaged face coverings and ensure they are properly worn over the nose and mouth by employees when required by orders from the [California Department of Public Health \(CDPH\)](#).

When employees are required to wear face coverings in the workplace, they may remove them under the following conditions:

- When an employee is alone in a room or a vehicle.
- While eating or 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 feasible.
- When employees are required to wear respirators in accordance with our respirator program that meets section 5144 requirements.
- 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. Such employees will wear an effective, non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition permits it. If their condition does not permit it, then the employee will be tested at least weekly for COVID-19.
- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time in which such tasks are being performed.

Any employee not wearing a required face covering will be tested at least weekly for COVID-19.

We will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Face coverings will also be provided to any employee that requests one, regardless of their vaccination status.

B. **Engineering Controls**

We maximize, to the extent feasible, the quantity of outside air for District buildings with mechanical or natural ventilation systems.

C. **Cleaning and Disinfecting**

D. **Hand Sanitizing**

1. We implemented reasonably effective hand sanitizing procedures, including:
 - (a) Providing employees time for handwashing for at least 20 seconds each time.
 - (b) Providing employees with an effective hand sanitizer that will not contain methanol (i.e., methyl alcohol).
 - (c) Evaluating our handwashing facilities and provide additional facilities where we deem necessary. This will be continued to be evaluated and adjusted as necessary.

E. **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.

Upon request, we provide respiratory for voluntary use to all employees who are working indoors or in vehicles with more than one person. An employee may request these from the Risk Management Department. Employees who request respirators will be encouraged to use the respirators in compliance protection determined to be appropriate in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained, as well as eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

D. Testing of employees

We make COVID-19 testing including COVID-19 rapid tests available at no cost to all employees with COVID-19 symptoms, close contacts or during outbreaks during employees' paid time.

IV. Investigating and Responding to COVID-19 Cases

A. Investigation Procedures

1. The District has effective procedures to investigate COVID-19 cases in the workplace, including procedures for verifying COVID-19 case status, receiving information regarding COVID-19 test results and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases.
2. Where there has been a COVID-19 case at a District worksite, and in the event there is a COVID-19 outbreak and/or a major outbreak, the District takes the following actions:
 - (a) Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
 - (b) Determine who may have had a COVID-19 exposure. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the high-risk exposure period.
 - (c) 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 all employees who may have had COVID-19 exposure and their authorized representatives, and independent contractors and other employers present at the workplace during the infectious period.
 - (d) Offer COVID-19 rapid testing kits at no cost to employees during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with the information on benefits.
 - (e) 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.

B. Confidentiality of Investigation

1. All personal identifying information of COVID-19 cases or symptoms are kept confidential. All COVID-19 testing or related medical services provided by us are provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that is 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.

2. All employees' medical records are also 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.

V. System for Communicating

- A. The District has a communication system with employees on matters relating to COVID-19 mitigation and response to ensure employees' safety in the workplace. This includes a clear and concise exchange of information between the District and employees by providing a single point of contact for managers and supervisors.
- B. District employees are encouraged to freely communicate with their supervisors and managers concerning COVID-19 symptoms, possible COVID-19 exposures, possible COVID-19 workplace concerns and hazards, and suggestions for correction of potential hazards without fear of reprisal.
- C. District employees are asked to report to their immediate manager or supervisor concerns regarding COVID-19 mitigation practices or possible COVID-19 exposure in the workplace without fear of reprisal.
- D. Managers and supervisors who, after assessing the concern, determine that additional guidance or assistance is required shall contact the Office of Personnel Services who will triage the report and notify essential personnel for an appropriate response.
- E. Employees with a disability, medical or other condition that places them at increased risk of severe COVID-19 illness and an accommodation is needed, will be encouraged to report it to their supervisor or manager without fear of reprisal. The District will engage in the interactive process by evaluating the request and determining, with input from the employee and their health care provider, whether the employee can be accommodated and what reasonable accommodations will be offered.
- F. When required by law, the District will provide COVID-19 testing to potentially exposed employees. If testing is required by law, employees will be informed of the reason for COVID-19 testing and the possible consequences of a positive test.

VI. Training and Instruction

- A. The District offers training and instruction that includes:
 1. Information on policies and procedures, and memoranda of understanding with appropriate exclusive bargaining representatives on COVID-19 hazards impacting employees.
 2. Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and memoranda of understanding between the District and appropriate exclusive bargaining representatives.
 3. Information concerning the contagious nature of COVID-19 including:
 - (a) COVID-19 is an infectious disease that can be spread through the air.

- (b) COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - (c) An infectious person may have no symptoms.
- 4. Information on 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.
- 5. The right of employees to request a respirator for voluntary use, as required by section 3205 without fear of retaliation, and our policies for providing the respirators. Employees voluntarily using respirators will be trained on:
 - (a) How to properly wear them.
 - (b) How to perform a seal check according to the manufacturer's instructions each time a respirator is worn, and the fact that facial hair can interfere with a seal.
- 6. Information on 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. Information on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 - (a) The conditions where face coverings must be worn at the workplace.
 - (b) Employees can request face coverings and can wear them at work regardless of vaccination status and without retaliation.
- 8. Information on COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- 9. Information on our COVID-19 policies and how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19 testing and vaccination, and the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

VII. Exclusion of COVID-19 Cases and Employees who had a Close Contact

- A. Where there is a COVID-19 case or a close contact at a District site, the District will limit transmission by:
 - 1. Ensuring that COVID-19 cases are excluded from the workplace until all return-to-work requirements are met.
 - 2. Reviewing current CDPH guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission. For easy read guide from CALOSHA click on link below:

https://www.dir.ca.gov/dosh/dosh_publications/Isolation-and-Quarantine-fs.pdf
 - 3. Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job, unless the District demonstrates that the COVID-19 exposure is not work-related. This will be accomplished by individual conversations with employees who have been exposed in the workplace to discuss leave options covered by the district, possible options to work remotely, and possible temporarily reassignment to work where they do not have contact with other persons until the return to work requirement is met. This conversation will determine all leave

options to support employees during exclusion due to COVID-19. Excluded employee may not be entitled to continued earnings, rights, and benefits, if the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19 transmission. Employees will be required to use available leave options when excluded from the workplace due to COVID-19.

4. Providing employees at the time of exclusion with information on available benefits.

VIII. Reporting, Recordkeeping, and Access

- A. The District implements reporting and recordkeeping procedures as follows:
 1. Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
 2. Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
 3. Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
 4. Use the **Appendix A: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

IX. Return-to-Work Criteria

- A. The District applies the following return-to-work criteria:
 1. **COVID-19 cases, regardless of vaccination status or previous infection and who do not develop symptoms or symptoms are resolving**, cannot return to work until we can demonstrate that all of the following criteria have been met:
 - a. At least five days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test;
 - b. At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever reducing medications; and
 - c. A negative COVID-19 test from a specimen collected on the fifth day or later is obtained; or, if unable to test ~~or the employer chooses not to require a test~~, 10 days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test.
 2. **COVID-19 cases, regardless of vaccination status or previous infection, whose COVID-19 symptoms are not resolving**, may not return to work until:
 - a. At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication; and
 - b. 10 days have passed from when the symptoms began.
 3. COVID-19 tests may be self-administered and self-read only if the following independent verification of the results can be provided
 4. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case shall wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19

symptoms, from the date of their first positive COVID-19 test.

5. The return to work requirements for COVID-19 cases who do or do not develop symptoms apply regardless of whether an employee has previously been excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
6. If an order to isolate, quarantine, or exclude 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.

X. Multiple COVID-19 Infections and COVID-19 Outbreaks

- A. The District adheres to the following policies and practices should the workplace experience a COVID-19 outbreak or major outbreak. A COVID-19 outbreak is defined as 3 or more cases of COVID-19 in a 14-day period. A major COVID-19 outbreak is defined as 20 or more cases of COVID-19 in a 30-day period.

This addendum will stay in effect until there are no new COVID-19 cases detected in the exposed group for a 14-day period.

- B. The District provides at no cost to the employees and will occur during working hours the legally mandated COVID-19 testing to all exposed employees in the workplace except for:
1. Employees who were not present during the relevant 14-day period.
 2. COVID-19 cases who did not develop symptoms after returning to work pursuant to our return-to-work criteria.

- C. All employees in our exposed group are immediately tested as frequently as required by local health department for a COVID-19 outbreak or a major COVID-19 outbreak, regardless of the vaccination status. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine, isolation, or exclusion period required by, or orders issued by, the local health department.

1. In the event there is a COVID-19 outbreak, all employees at the exposed workplace shall be tested and then tested again one week later. After the first two COVID-19 tests, the District will provide continuous COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
2. Employees who had close contacts shall have a negative COVID-19 test taken within three and five days after the close contact or shall be excluded and follow the return to work requirements of section IX.
3. We make additional testing available when deemed necessary by Cal/OSHA or if recommended by the local health department.

- D. We continue to comply with the applicable elements of our CPP, as well as the following:

1. Employees in the exposed group wear face coverings when indoors, or when outdoors and less than six feet apart (unless one of the face-covering exceptions indicated in our CPP apply).
2. We give notice to employees in the exposed group of their right to request a respirator for voluntary use if they are not fully vaccinated.
3. We evaluate whether to implement physical distancing of at least six feet between persons, or where six feet of physical distancing is not feasible, the need for use of cleanable solid partitions of sufficient size to reduce COVID-19 transmission.
4. Implement any other control measures deemed necessary by Cal/OSHA.

- E. The District immediately investigates and determines possible COVID-19 hazards that may have contributed to the outbreak in accordance with “Identification, Evaluation, and Correction of COVID-19 Hazards” and “Investigation and Responding to COVID-19 Cases.”
- F. The District performs a review of its COVID-19 policies, procedures, and controls and implement changes and corrections where needed. This review will be updated every 30 days that the outbreak continues, in response to new information or to new or previously unrecognized COVID-19 hazards. The investigation and review is documented and includes review of:
 - 1. Leave policies and practices to insure employees are encouraged to remain home when sick;
 - 2. COVID-19 testing process;
 - 3. Sufficiency of outdoor air circulation and air filtration;
 - 4. Sufficiency of physical distancing, face coverings or use of other PPE;
 - 5. The need to move indoor tasks outdoors or having them performed remotely.
- G. In the event of a major outbreak, review will include:
 - 1. The mechanical ventilation, and, if possible, filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the system. We will evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other cleaning systems would reduce the risk of transmission.
 - 2. The need for additional respiratory protection.
 - 3. Whether to halt some or all operations until the COVID-19 hazard has been corrected.
 - 4. Implement any other control measures as required by Cal/OSHA.

Appendix A: Investigating COVID-19 Cases

Date: **[enter date]**

Name of person conducting the investigation: **[enter name(s)]**

Employee (or non-employee) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
Date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):			

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	