

# COVID-19 Prevention Program (CPP) for Fairmont Schools

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

**Date: February 1, 2021**

## Authority and Responsibility

**Kristen Jansen, COVID Coordinator** has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

## Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention, including the California Department of Education and the Orange County Department of Public Health.
- 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: Town Halls, weekly staff meetings, orientation meetings and training sessions.

## Employee screening

We screen our employees by having every employee complete a digital self assessment every day prior to arriving on campus. Employees have temperatures taken with a non-contact thermometer upon arrival, show confirmation of the form completion and turn on their TRACE app (contact tracking app) daily.

## Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

The severity of the hazard will be assessed and correction time frames assigned, accordingly through the use of the Covid-19 inspections form conducted by the Covid Coordinator, HR team, and the facilities team if needed.

Individuals are identified as being responsible for timely correction. This will include the campus/facility Director and the Operations manager.

Follow-up measures are taken to ensure timely correction. Team will reassess the deficiency 48 hours after the report.

## 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:

In the classrooms:

- Student desk distance has been measured and desks not available for use have been clearly marked.
- Classrooms without desks have 6 foot areas marked with tape on the floor.

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.

- We do not allow visitors on our campuses at this time.

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 class schedules or routines, such as modifying daily activities, 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

Fairmont employees are expected to follow federal, state, and local guidelines on when and where cloth face coverings are required.

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 where required by orders from the California Department of Public Health (CDPH) or local health department.

Fairmont will provide two (2) cloth face coverings per employee that are reusable. Disposable masks/cloth face coverings and gloves will also be available at each campus and the business office.

- a. Face shields will be provided upon request. If an employee would like to use a face shield, s/he should see his or her campus director/department director to arrange getting one. Note- this is in addition to a mask.
- b. Cloth face coverings must be worn at all times including:
  - i. Upon building entry. Masks/ cloth face coverings must be worn during temperature screening. (See section Health Screening/Daily Symptom Check)
  - ii. When leaving the work area or classroom.
  - iii. While attending in-person meetings.
  - iv. When required for job duties such as custodial staff cleaning on campus.
  - v. When leaving a campus or the business office.
  - vi. In common areas including hallways, restrooms, break rooms, etc. Cloth face covering can be removed when eating in break rooms.
  - vii. When outside.



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

- When an employee is alone in a room with the doors closed.
- While eating and drinking at the workplace
- 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. Accommodations will be considered with proper documentation.

Employees are expected to comply with the face covering requirement as a condition of employment, as well as for the health and safety of themselves, their colleagues, and the Fairmont community.

Employees who do not comply should be reminded of the policy by their supervisor and provided additional education and training as needed. If, after additional education and training, personnel refuse to comply, contact Human Resources (HR) to initiate the appropriate corrective action process including verbal, written, and final notification in accordance with applicable employee policies.

## **Engineering controls**

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

- In all our campuses/sites, we have added plexiglass partitions at our reception areas
- Furniture was removed from areas/rooms to allow for more space in between individuals
- Signage was provided to remind individuals when entering or exiting buildings/rooms/common areas for social distancing

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

- Leaving doors open when air quality permits
- Additional thermostat controlled fans are provided for areas that have limited ventilation
- Air Conditioning units are maintained by our inhouse Facilities Department
  - Filtration is serviced every 3 months per indoor air quality specifications
  - All air filters are in the process of upgrading to MERV-13 or higher if possible

## **Cleaning and disinfecting**

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

As employees return to work, they should review their work area and remove all excess clutter. Custodial staff will clean desktops and wipe down phones nightly. Remove pictures, paperwork etc. from desktops before leaving for the day. Keeping clutter to a minimum will make it easier for custodial staff to gain access to all spaces for cleaning.

Fairmont will provide disposable paper towels for use with One Step disinfectant/sanitizer spray. The disinfectant spray has a 2 minute kill time on the coronavirus and 10 minute total kill time for other viruses and bacteria. Fairmont strongly recommends cleaning workspaces after eating or anytime the area becomes dirty. Baskets have been installed with disinfectant spray and disposable paper towels in every classroom, office space, and room.

- a. Deep cleaning/disinfecting will be done by the Facilities Department. Deep cleaning/disinfecting will take place at each location at least twice a week. Remove all food items or anything that should not be disinfected. Check with campus directors or department directors regarding location cleaning schedules.

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

The Facilities Manager will:

1. Work with Campus to determine what areas to clean.
2. Work with Campus to create a deep cleaning and disinfection schedule.
  - a. Follow CDPH industry guidance for schools. "Close off areas used by any individual suspected of being infected with the virus that causes COVID-19 and do not use before cleaning and disinfection. To reduce risk of exposure, wait 24 hours before you clean and disinfect. If it is not possible to wait 24 hours, wait as long as practicable. Ensure a safe and correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning. Keep disinfectant products away from students."
  - b. Facilities Crew uses the Titan Impact 410 Sprayer w/Disinfectant Nozzles. Royal Paper Corp. trained the Facilities Manager and Facilities Manager trained his Lead followed by the training of the entire crew.

## **Shared tools, equipment and personal protective equipment (PPE)**

PPE must not be shared, e.g., gloves, masks, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, microphones, 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 sanitizing crew and directly by the employee who uses the items. Materials and training have been provided at each site.

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users. Disinfectant spray and wipes and gloves are available in each vehicle and employees are expected to disinfect after each use. Vehicles are washed/cleaned by an outside company on a weekly basis including disinfection.

## **Hand sanitizing**

In order to implement effective hand sanitizing procedures:

- a. Fairmont will provide hand sanitizer in all common areas, and all sinks will have hand soap dispensers. Restroom fixtures have been upgraded to touchless technologies.
- b. All classrooms and common areas are equipped with cleaning wipes, hand sanitizer, and additional sinks.
- c. Expectations for hand washing. CDC guidelines should be followed on how to properly wash hands with soap and water for 20 seconds and use of hand

sanitizer if washing hands is not possible. This includes key times when germs are likely to be spread such as:



- i. After using the restroom
- ii. Before/after eating
- iii. After blowing nose, coughing, or sneezing
- iv. After putting on/removing cloth face covering
- v. After use of chemicals as required for job duties
- vi. Before/after providing routine care for another person who needs assistance (e.g., a child)
- vii. After removing disposable gloves

## **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.

# 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:

- Notified by our COVID-19 Coordinator with detailed instructions of quarantine period, return date after exposure, and testing information.
- Employees will be directed to their health care provider or a public testing site.
- Should any cost be incurred for the testing, Fairmont will reimburse the cost of the test.
  - If Employee must test during working hours, no reduction in work hours will be applied.
- If applicable, a Worker's Compensation Claim will be filled by an HR Representative.
- The HR Representative will work with the workers's compensation insurance carrier to establish the claim and follow all proper worker's compensation rules and regulations.

## System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to their direct supervisor via a phone, text, email, or in person.
- Employees can report symptoms and hazards without fear of reprisal.
- Our Employee Guidelines address how to address underlying health conditions for employees at increased risk of severe COVID-19 illness.
- Employees can access voluntary COVID-19 testing by:
  - Contacting your direct medical provider and get a referral for a test.
  - Refer to the free testing options offered by the OC Health Care Agency site:  
<https://occovid19.ochealthinfo.com/covid-19-testing#wherecanlgettested>
- In the event Fairmont is 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 consequences of a positive Test.
  - Employees will be directed to take a COVID-19 test at our contracted clinic:
    - Gateway Medical Center
    - 1006 W La Palma Ave, Anaheim, CA
    - (714) 778-3838
    - Test will be paid by Fairmont Schools
    - Test administered will be the PCR with results provided within 24 hours

- Information provided to the clinic includes Name, Phone, DOB, Address of employees who were exposed at the workplace

## Training and Instruction

We will provide effective training and instruction that includes:

- Our [COVID-19 Return to Work Guidelines](#) and COVID Employer Response 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 protect others and the wearer of the mask.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- Training Rosters are maintained for all COVID-19 Meetings and Trainings.

## 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 10 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by company paid FFCRA through March 31, 2021, and the employer provided sick leave. We will provide employees at the time of exclusion with information on available benefits.



## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the Orange County Health Care Agency 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, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.
- Covid cases that present in our facilities are publicly posted on our website.

## Return-to-Work Criteria

COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:

- At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
- COVID-19 symptoms have improved.
- At least 10 days have passed since COVID-19 symptoms first appeared.

COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

A negative COVID-19 test will not be required for an employee to return to work.

If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.



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**Chad Jackson** , President

02/01/2021

**Date**

# 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 and authorized employee representative that participated:**

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

## Appendix B: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Temperature Check in stations - Working thermometer - Disposable masks - Gloves			
Classroom setting - Desk spacing - Teacher desk			
Ventilation (amount of fresh air and filtration maximized)			
Hand sanitizing/wash stations			
Reception desk shields			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
<b>PPE</b> (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Doors open where appropriate			
Clean air filters and proper circulation			

## 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:**

<b>Employee (or non-employee*) name:</b>		<b>Occupation (if non-employee, why they were in the workplace):</b>	
<b>Location where employee worked (or non-employee was present in the workplace):</b>		<b>Date investigation was initiated:</b>	
<b>Was COVID-19 test offered?</b>		<b>Name(s) of staff involved in the investigation:</b>	
<b>Date and time the COVID-19 case was last present in the workplace:</b>		<b>Date of the positive or negative test and/or diagnosis:</b>	
<b>Date the case first had one or more COVID-19 symptoms:</b>		<b>Information received regarding COVID-19 test results and onset of symptoms:</b>	

**Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):**

**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:**

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

# Additional Consideration #1

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

This section of CPP will be utilized if we are determined by the local health department to have a Covid outbreak (3 or more cases in one group or 5% of the total site population).

### COVID-19 testing

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 10-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
  - All employees in our 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 local health department.
  - After the first two COVID-19 tests, we will continue to provide 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 10-day period.
  - We will provide additional testing when deemed necessary by Cal/OSHA.

### Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases and Return to Work Criteria** requirements, and local health officer orders if applicable.

### Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

### COVID-19 investigation, review and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards**, 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 including:

- Our leave policies and practices and whether employees are discouraged from remaining home when sick.
  - Our COVID-19 testing policies.
  - Insufficient outdoor air.
  - Insufficient air filtration.
  - Lack of physical distancing.
- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. 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.
  - [describe other applicable controls].

### **Notifications to the local health department**

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

## **Additional Consideration #2**

### **Major COVID-19 Outbreaks**

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 10-day period.

#### **COVID-19 testing**

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

#### **Exclusion of COVID-19 cases**

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

#### **Investigation of workplace COVID-19 illnesses**

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

#### **COVID-19 hazard correction**

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

#### **Notifications to the local health department**

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.