



## COVID-19 Prevention Program (CPP) for Monticello Academy

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

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

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

### Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

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

### Employee participation

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

- Information is given to the employee for review.
- Information is discussed regularly at a faculty meeting about COVID-19.

### Employee screening

We screen our employees by:

- Employees are expected to clean their hands before entering and after leaving the school premises.
- Everyone is expected to complete a daily health survey before coming to work.
- Routine temperature checks are done at every transition- morning, lunch, and after-school with a non-contact thermometer.

## Correction of COVID-19 Hazards

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

- The severity of the hazard will be assessed and correction time frames assigned, accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

## 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:

- Allowing Elective/Enhancement Teachers to teach from home.
- Reducing the number of persons in an area at one time.
- Do not allow parents or visitors on campus unless you are a preschool parent dropping off or picking up.
- 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.
- Reference section [3205\(c\)\(6\)](#) for details

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.

At Monticello Academy, all employees are required to wear a mask at all times throughout the day. No one is allowed on campus without a mask. Any employees who do not have a mask can obtain one from the Administration. Employees are to clean all fabric mask daily, and disposable masks are used only once. Facial shields are available upon request.

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

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

Any employee not wearing a face covering, face shield with a drape, or other effective alternatives, for any reason, shall be at least six feet apart from all other persons

### Engineering controls

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

- Plexiglass barriers between desks.
- Limit the capacity of the numbers of people within a certain area.

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or

natural ventilation systems by:

- Switching all filtration to MERV 13 filters.
- Quarterly maintenance of the ventilation system for heating and cooling.
- Fans are on at all times to filter out the air.
- Window and doors are opened daily, regardless of the weather.
- Classrooms with no windows have an air purifier on at all times. Air filters are changed every nine months as recommended.
- Whenever there are any weather hazards, such as heat and wildfire smoke, building fans are always on to circulate the air within the classroom.

### **Cleaning and disinfecting**

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

- Ensuring adequate supplies and adequate time for it to be done properly.
- Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfection.

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

- Immediately sent everyone that is in close contact home.
- Close the facility for 24 hours before deep cleaning can be done.
- Onsite maintenance person and daily janitorial service will be in charge of deep cleaning the facility.
- All major or daily cleaning is done daily after closing.
- Employees are responsible for daily routine cleaning during operation.

### **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 use of having an onsite maintenance person or providing the employees with the materials and training to do it themselves

### **Hand sanitizing**

To implement effective hand sanitizing procedures, we:

- Evaluating handwashing facilities.
- Determining the need for additional facilities.
- Encouraging and allowing time for employee handwashing.
- Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encouraging employees to wash their hands for at least 20 seconds each time.

### **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 per 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:

- Require to be tested immediately if they are showing symptoms.
- Quarantine for 14 days and tested after 6-7 days.
- Sent home immediately for quarantine.

- Testing can be done through the County or their healthcare provider.
- Deep cleaning will happen after 24 hours.
- An investigation into who is the close contacts.

## 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:

- Any employees with COVID-19 symptoms and possible hazards must report or notify the school nurse or Administration as soon as possible so proper reporting can be done promptly and cleaning protocol can be done.
- Those employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions put them at increased risk of severe COVID-19 illness.
- Where testing is required, how employees can access COVID-19 testing through their health plan or the county testing center at [FREE COVID-19 Testing Sites – Novel Coronavirus \(COVID-19\) – County of Santa Clara \(sccgov.org\)](https://www.sccgov.org/health-services/COVID-19-testing). Testing is not provided by Monticello Academy.
- 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 consequences of a positive test. If there is an exposure, employees are asked to get tested through their health insurance or the county free testing sites.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.

## Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- 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 infected 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 handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing 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.
- Routine cleaning is expected within the classroom and in common areas throughout the day.

**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've demonstrated that the COVID-19 exposure is work-related. This will be accomplished by providing employees with paid time off benefits.
- Providing employees at the time of exclusion with information on available benefits.

## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department. Reports are done within 4 hours of notification.
- 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 connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program per CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
    - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
    - COVID-19 symptoms have improved.
    - At least 10 days have passed since COVID-19 symptoms first appeared.
  - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 14 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.
-

## 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:** Trinh Trinh

**Date:** February 1, 2021

**Name(s) of employee and authorized employee representative that participated:** Trinh Trinh, Evon Melchor, Rebecca Leung, Nancy Nguyen, Megan McMahon, Mai Tran, Mai Duong, Ramon Cardenas, Javier, Sarireh Nadimi, Lucy Doan, Anca Togan, Juan Herrera, Brazill Givens, Jessica Chavez, Eren Del Rio, Anna Jew, Amanda Loy, Archana Samuedi, Elise Walker, Tarez Joudy, Reema Chahal, Tazia Hendrix, Kelly Green, Amelia Fishpaw, Katherine Pampuch, Danielle Terehoff, Nam Vu, Vanessa Montelongo, Carrie Kari, John Freitas, Diana Savastio, Matt Tyler, Cori Stevenson, Mayra Contreras, Suzy Woodley, Monique Terehoff, MaryAnn Lopez, Lorna Flores, Darla Johnson, Jean Soper, Barbara Diggs, Elena Lopez, Karla Armenta, Lien Le, and Sydney Hall, Arrash Jaffarzadeh, Ling Lam, Kenneth Glassey, John Hsu, Lael Fluker, Natalie Haworth-Liu, and Lonie Fullerton.

Interaction, area, activity, work task, process, equipment, and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions, and ventilation
Lobby Area	Break times	Employees only	Stagger times
Conference Room	Break times	Employees only	Stagger times
Hallways	Transition and break times	Employees only	Stagger times
Copy Room	All-day	Employees only	Limit number of people
Bathrooms	All-day	Employees only	Partitions between stalls and sinks

## Appendix B: COVID-19 Inspections

**Date:** February 1, 2021

**Name of person conducting the inspection:** Trinh Trinh

**Work location evaluated:** 3345 Lochinvar Avenue, Santa Clara, CA 95051

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions	Good	Maintenance Person	As needed
Ventilation (amount of fresh air and filtration maximized)	Good	Maintenance Person	As needed
Air Purifier	Good	Maintenance Person	Every 9 months
Air Filtration – Merv 13	Good	AC Maintenance	Every 3 months
<b>Administrative</b>			
Physical distancing	As needed	Administration	Daily
Surface cleaning and disinfection (frequently enough and adequate supplies)	Hourly	Administration and Maintenance Person	Daily
Handwashing facilities (adequate numbers and supplies)	Good	Maintenance Person	Daily
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	Good	Maintenance Person	Daily
Fogging of classrooms each night	Good	Maintenance Person	Daily
Daily Janitorial	Good		Daily
<b>PPE (not shared, available, and being worn)</b>			
Fabric Face coverings (cleaned daily)	As needed	Administration	Daily
Gloves	As needed	Administration	Daily
Face shields/goggles	As needed	Administration	Daily

## 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, except for 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:** February 1, 2021

**Name of person conducting the investigation:** Trinh Trinh

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

<b>Notice is 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>			
<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>Date:</b>		
	<b>Names of individuals that were notified:</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>	

\*Should an employer be made aware of a non-employee infection source COVID-19 status.

## Appendix D: COVID-19 Training Roster

**Date:** February 1, 2021

**Person that conducted the training:** Trinh Trinh

Employee Name	Signature
Evon Melchor	Evon Melchor
Rebecca Leung	Rebecca Leung
Nancy Nguyen	Nancy Nguyen
Megan McMahon	Megan McMahon

## Additional Consideration #1

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

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within 14 days. Reference section [3205.1](#) for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for 14 days.

#### 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 14-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 14 days.
  - 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 per 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 per 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 review 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 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 will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within 30 days. Reference section [3205.2](#) for details.]**

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for 14 days.

#### **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 per 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**.