

COVID-19 Prevention Plan (CPP) for the San Joaquin County Office of Education

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

Date: March 6, 2024

Authority and Responsibility

The County Superintendent of Schools has overall authority and responsibility for implementing the provisions of this CPP in our workplace. The Superintendent has designated the Division Director of Operations and Support Services as the CPP Officer for implementation of the specific elements of this plan. 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 procedures.

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

Application of the San Joaquin County Office of Education COVID-19 Prevention Plan (CPP)

COVID-19 is a recognized hazard in our workplace that is addressed through our CPP, which will be effectively implemented and maintained to ensure the following:

1. When determining measures to prevent COVID-19 transmission and identifying and correcting COVID-19 hazards in our workplace:
 - a. All persons in our workplace are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.
 - b. COVID-19 is treated as an airborne infectious disease. Applicable State of California and San Joaquin County Public Health Services orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls may include:
 - i. Face coverings.
 - ii. Physical distancing.
 - iii. Reducing population density indoors.
 - iv. Moving indoor tasks outside.
 - v. Implementing separate shifts and/or break times.
 - vi. Restricting access to work areas.
 - vii. Engineering controls including maximizing the supply of outside air where feasible and use of air purification technologies.
 - viii. Facility cleaning and disinfection procedures.
 - ix. Encouraging frequent hand washing and sanitizing.
 - x. Encouraging respiratory etiquette, including covering mouth and nose when coughing and/or sneezing.

2. Training and instruction on COVID-19 prevention is provided:
 - a. When this CPP was first established.
 - b. To new employees.
 - c. To employees given a new job assignment involving COVID-19 hazards on which they have not been previously trained.
 - d. Whenever new COVID-19 hazards are introduced.
 - e. When we are made aware of new or previously unrecognized COVID-19 hazards.
 - f. For supervisors to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.

The Keenan Safe Schools Training System is used to record CPP employee training.

3. Procedures to investigate COVID-19 illnesses at the workplace include:
 - a. Determining the day and time a COVID-19 case was last present; the date of the positive COVID-19 tests or diagnosis; and the date the COVID-19 case first had one or more COVID-19 symptoms.
 - b. Requiring employees to report COVID-19 symptoms and to stay home when ill. Employees exhibiting COVID-19 symptoms or testing positive for COVID-19 must report their status using the self-screening tool at <https://selfscreening.org> or www.sjcoe.org, or employees may download the Schools Self-Screening App to their smartphone from the Apple App or Google Play stores.
4. Effective procedures for responding to COVID-19 cases at the workplace include:
 - a. Excluding COVID-19 cases from the work place during the infectious period.

For cases with symptoms, the infectious period is a minimum of 24 hours from the day of symptom onset:

 - COVID-19 cases may return to work if 24 hours have passed with no fever, without the use of fever reducing medications, AND
 - Their symptoms are mild and improving.

For COVID-19 cases with no symptoms, there is no infectious period for the purposes of isolation or exclusion. If symptoms develop, the criteria above will apply.
 - i. Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case must wear a face covering in the work place until 10 days have passed since the date of their first positive COVID-19 test, except:

After ending isolation, confirmed cases may remove their mask sooner than after day 10 if they have two sequential negative tests at least one day apart.
 - ii. These procedures apply regardless of whether an employee has been previously excluded or other precautions were taken in response to an employee's close contact or membership in an exposed group.
 - a. During an outbreak or major outbreak, excluding from the workplace, employees who refuse to test and have symptoms, for at least 24 hours from the symptom onset. They may return to work only when they have been fever free without the use of fever-reducing medications and symptoms are mild and improving.

- b. Reviewing current **California Department of Public Health (CDPH)** guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.
- c. 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.
- d. Upon excluding an employee from the workplace based on COVID-19, the San Joaquin County Office of Education will provide excluded employees information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, workers' compensation law, local governmental requirements, and the San Joaquin County Office of Education leave policies.

Notice of COVID-19 Cases

Employees and independent contractors who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible, and in no case longer than one business day of the San Joaquin County Office becoming aware of the close contact.

When Labor Code section 6409.6 or any successor law is in effect, the San Joaquin County Office of Education will:

- Provide notice of a COVID-19 case, in a form readily understandable to employees. The notice will be given to all employees, employers, and independent contractors at the worksite.
- Provide the notice to the authorized representative, if any of:
 - The COVID-19 case and of any employee who had a close contact.
 - All employees on the premises at the same worksite as the COVID-19 case within the infectious period.

Face Coverings

Employees will be provided face coverings and be required to wear them:

- When required by orders from the CDPH. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors.
- During outbreaks and major outbreaks.
- When employees return to work after having COVID-19 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, unless:
 - After ending isolation, confirmed cases may remove their mask sooner than after Day 10 if they have two sequential negative tests at least one day apart.

Face coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
3. While employees are wearing respirators required by the employer and used in compliance with CCR, Title 8 section 5144.
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
5. During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.

If an employee is not wearing a face covering due to exceptions (4) and (5), above, the COVID-19 hazards will be assessed, and action taken, as necessary.

Employees will not be prevented from wearing a face covering, including a respirator, when not required by this section, unless it creates a safety hazard.

Respirators

Respirators will be provided for voluntary use to employees who request them and who are working indoors or in vehicles with more than one person. Employees who request respirators for voluntary use will be:

- Encouraged to use them.
- Provided with a respirator of the correct size.
- Trained on:
 - How to properly wear the respirator provided.
 - How to perform a user seal check according to the manufacturer's instructions each time a respirator is worn.
 - The fact that facial hair interferes with a seal.

The requirements of CCR, Title 8 section 5144(c)(2) will be complied with according to the type of respirator (disposable filtering face piece or elastomeric re-usable) provided to employees.

Ventilation

For our indoor workplaces, we will:

- Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH [Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments](#). The San Joaquin County Office of Education will develop, implement, and maintain effective methods to prevent transmission of COVID-19, including one or more of the following actions to improve ventilation:
 - Maintain and adjust ventilation systems to maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA)

Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

- Utilize Global Plasma Solutions (GPS) devices to maintain clean and safe indoor air quality, prevent the spread of the COVID-19 virus, and better filter smoke-filled air during fire season. The GPS units work with the heating, ventilation, and air conditioning systems in the buildings. This technology has a 99.4% kill rate of the COVID-19 virus, and works to kill other viruses and bacteria, including the flu virus, according to the manufacturer.

In vehicles, we will instruct employees to maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

Reporting and Recordkeeping

The San Joaquin County Office will:

- Report information about COVID-19 cases 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 illness or death, as defined under CR Title 8, section 330(h), of an employee occurring in the place of employment, or in connection with employment.
- Report major outbreaks to Cal/OSHA.
- Make the written COVID-19 Prevention Plan (CPP) available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Keep a record of and track all employee COVID-19 cases. These records will be made available to employees, authorized employee representatives, or as otherwise required by law, while protecting employee personal health information as required by law.

COVID-19 Outbreaks

A COVID-19 Outbreak is defined as:

When three or more COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a fourteen-day period. Reference CCR, Title 8 section 3205.1 for details.

These COVID-19 Outbreak procedures will stay in effect until there are one or fewer new COVID-19 cases detected in the exposed group for a fourteen-day period.

Exclude from Work

All symptomatic COVID-19 cases will be excluded from the workplace.

During an outbreak, all employees who refuse to test and have symptoms, will be excluded from the workplace for at least 24 hours from symptom onset. They may return to work only when they have been fever-free for at least 24 hours without the use of fever-reducing medications and symptoms are mild and improving.

COVID-19 Testing

COVID-19 tests are available at no cost during paid time to all SJCOE employees upon request and

employees who had a close contact in the workplace.

Face Coverings

Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

Respirators

Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

COVID-19 Investigation, Review, and Hazard Correction

The San Joaquin County Office of Education will perform a review of potentially relevant COVID-19 policies, procedures, and controls, and implement changes as needed to prevent further spread of COVID-19 when this addendum initially applies and periodically thereafter. The investigation, review, and changes 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 supply of outdoor air to indoor workplaces.
 - Insufficient air filtration.
 - Insufficient physical distancing.
- Review updated every 30 days that CCR, Title 8 section 3205.1 continues to apply:
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing the outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing to the extent feasible.
 - Requiring respiratory protection in compliance with CCR, Title 8 section 5144.
 - Other applicable controls.

Ventilation

Buildings or structures with mechanical ventilation will have recirculated air filtered 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, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

Major Outbreaks

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- Exclude COVID-19 cases as well as employees with symptoms in the exposed group who do not take a COVID-19 test.
- Immediately ensure that all employees in the exposed group who remain at work are tested for COVID-19 at least twice weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period. Employees in the exposed group that do not take the COVID-19 test will be excluded until our return-to-work criteria have been met.
- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement. Methods of physical distancing include:
 - 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.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.