

COVID-19 Prevention Plan (CPP) for The Center for Learning Unlimited (CLU)

Note: This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace. Dated: 02/02/21

Introduction

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

This CPP is designed to control exposures to the SARS-CoV-2 virus aka “COVID-19” (COVID) that may occur in our workplace or job sites.

Contact Information

Role	Name	Email	Contact Info
Director	Virginia Erxleben	director@cflu.org	310-997-1900 ext. 105
Assistant Director	Jen Mize	jennifer@cflu.org	310-997-1900 ext. 102
Fed -OSHA	N/A	N/A	800.321.6742
Cal- OSHA	N/A	N/A	800.963.9424

Authority and Responsibility

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

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

COVID-19 Compliance Task Force

The purpose of the CLU COVID-19 Compliance Task Force is to serve as a stakeholder advisory body that will develop data driven planning assumptions and scenarios as input to CLU decision making given the ever-changing Covid-19 pandemic circumstances.

The varied task force is composed of the following administrators, employee representatives, and other key stakeholders:

CLU Role	Name(s)
Director	Virginia Erxleben
Board of Directors	Steve Beihler Dr. Steve Lawrence Charles Fiedler Christian Maeder Debra Kurth
Assistant Director & Human Resource Liaison	Jen Mize
Lead Teacher	Jennifer Laferriere

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Evaluate potential workplace exposures to all persons at, or who may enter, our workplace.
- CLU will see input from personnel when evaluating their workspace to identify COVID-19 hazards.
- CLU will 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.
- CLU personnel and students are encouraged to report any and all concerns regarding COVID-19 safety protocols and policies to the assistant director/COVID-19 Compliance Task Force.
- Conduct periodic inspections 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:

Employee screening

We screen our employees by:

- Requiring each employee to complete the Envoy Protect Health Survey prior to the start of their scheduled shift. The Health Survey screens for the following symptoms: current or recent fever (100.3 or higher), new or worsening cough, new or worsening shortness of breath, muscle/body aches, diarrhea/vomiting, new loss of taste/smell, and feeling feverish.
 - Employee supervisors verify completion of the survey for each of their personnel at the beginning of the work shift.
 - The Assistant Director will receive an email alert indicating when the employee has not passed the Envoy Protect Health Survey.
- While wearing a face covering, personnel are required to utilize the touchless Envoy Temporal Scanner, I which is located in the lobby, for a temperature screening.
 - A normal temperature reading will unlock the school door and permit the staff gain entry.
 - If an elevated temperature is detected an alarm will sound and an alert will be emailed to the Assistant Director and the corresponding supervisor. The personnel is required to wait in the lobby until a supervisor can conduct a secondary touchless thermometer.
 - The Assistant Director or corresponding supervisor will meet the personnel in the lobby for a secondary temperature scan. If an elevated temperature (100.3 or higher) is registered the employee will not be permitted on campus and permitted to work remotely.

Correction of COVID-19 Hazards

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

- Conduct periodic inspections of the school campus and correct potential hazards that exist in common areas, high traffic areas, and other areas frequented by personnel and students.
- CLU has a COVID-19 Containment, Response and Control Plan that describes the school's approach to preventing and containing the spread of COVID-19 on campus.

- CLU has developed a COVID-19 Compliance Task Force that is responsible for establishing and reinforcing all COVID-19 safety protocols.

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:
 - Unnecessary tables and chairs have been removed from work and common areas.
 - Lunch tables have been marked with tape to indicate a distance of at least 6 feet between seats.
 - Workspaces have been arranged to be at least 6 feet apart.
 - Nonessential visitors will be restricted to the lobby and not permitted to access classrooms, offices, or restrooms.
 - Occupancy is reduced in and space between employees has been maximized in all work spaces and break areas.
 - Visual cues such as signs and floor markings have been used to indicate where employees and visitors should be located or their direction and path of travel.
 - Use of common areas will be scheduled in advance.
 - Personnel are encouraged to work outside when weather and work tasks permit.
 - Personnel have been provided a personal workstation.
 - All personnel and visitors have been provided instructions regarding maintaining physical distancing.
 - Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

- Anyone entering school property who has contact with others is required to wear an appropriate face covering.
- CLU provides 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. CLU will replace any damaged or soiled face coverings.
- The following are exceptions to the use of face coverings in our workplace:
 - When personnel 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 have been instructed by their medical provider 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, such as a face shield with a drape on the bottom edge, will be determined. All alternative face coverings must be in compliance with State directives.

Engineering Controls

- The following measures have been implemented to promote optimal ventilation:

- The HVAC systems are in good working order.
- Portable, high-efficiency air cleaners have been placed in shared spaces. Air filters will be replaced according to manufacturer's directions.
- If weather permits, doors and windows to be left open.

Cleaning and Disinfecting

- We implement the following cleaning and disinfection measures for frequently touched surfaces:
 - CLU will assign personnel and establish routine schedules to clean and disinfect common areas and objects in the workplace. This includes but is not limited to doorknobs, light switches, desks, tables, benches, chairs, counters, copy machines, microwaves, and snack area.
 - Disinfecting will be conducted by EPA approved disinfectants.
 - Adequate supplies have been made available to non-custodial staff.
 - Individuals are encouraged to report to the CLU assistant director if they have any questions or concerns regarding the implementation of any of the above protocols.
- Should we have a COVID-19 case in our workplace, we will implement the following procedures:
 - The CLU Assistant Director will conduct an investigation to determine the areas in need of additional disinfecting and cleaning.
 - CLU will temporarily close the identified areas where the infected person worked/visited until cleaning has been completed.
 - If possible, open the windows and the doors with outside access to increase circulation in that area for as long as practical prior to cleaning and disinfecting the area.
 - Cleaning personnel and custodial personnel cleaning the area must be equipped with proper personal protective equipment (PPE) for COVID-19 disinfection (disposable gown, gloves, eye protection, or mask).

Shared Tools, Equipment, and Personal Protective Equipment (PPE)

- PPE (e.g., gloves, goggles and face shields) must not be shared.
- 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
- Sharing of vehicles will not be permitted at this time.

Hand sanitizing

- Handwashing
 - All personnel and students will have access to soap, water, and paper towels.
 - Students and personnel are provided frequent opportunities to wash their hands for 20 seconds with soap, rubbing thoroughly after application, and use paper towels to dry hands thoroughly.
- Hand sanitizer
 - Ethyl alcohol-based (contains at least 60% ethanol) hand sanitizer is effective against COVID-19 and available to all employees in or near the following locations:
 - Front desk

- Lobby
- Classrooms
- Administration offices
- Staff workstations
- Hand sanitizers with isopropyl alcohol as the main active ingredient are not to be used on campus, as they can be more irritating and can be absorbed through the skin.
- Swallowing alcohol-based hand sanitizers can cause alcohol poisoning. Hand sanitizer should not be left out in the open or used without supervision for under 9 years old. If there is reason to believe that a student has consumed hand sanitizer, call Poison Control at 1-800-222-1222.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

- Personal protective equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. PPE is effective against COVID-19. The following PPE is stored in the Assistant Director's office and available all personnel:
 - Latex-Free medical gloves in various sizes
 - Face shields
 - Face coverings
 - Gowns
- PPE must not be shared.
- CLU will 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.
- When applicable, CLU will provide and ensure use of 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. Investigating and Responding to COVID-19 Cases
 - *This will be accomplished by using the **Appendix B: Investigating COVID-19 Cases form.***

Investigating and Responding to COVID-19 Confirmed Cases or Suspected Cases

CLU follows all protocols as outlines by the LACDPH Screening and Exposure Decision Pathways for Symptomatic Persons and Contacts of Potentially Infected Persons, Reopening School Protocols for K-12 Schools, and the Protocol for COVID-19 Exposure Management Plan for K-12 Schools.

CLU maintains an Excel spreadsheet for the purpose of recording suspecting cases. This sheet is used to monitor, track and report symptomatic and positive cases.

CLU maintains an Excel spreadsheet recording positive cases and their corresponding 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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how
 - CLU has created a COVID-19 Compliance Task Force that is responsible for establishing and

enforcing all COVID-19 related protocols. The COVID-19 Compliance Task Force is also responsible for training students and staff on the related protocols and procedures.

- Personnel are encouraged to report any concerns to the COVID-19 Compliance Task Force.
- That employees can report symptoms and hazards without fear of reprisal.
 - Personnel are encouraged to report any concerns, hazards, violations or questions related to the LACDHP Protocols and/or orders as they relate to the safety of school personnel and students.
 - CLU adheres to all California Public Policy Laws as it relates to Whistleblower protections.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
 - Personnel with medical or other conditions that put them at increased risks of severe COVID-19 are encouraged to meet remotely with the CLU Assistant Director/COVID-19 Compliance Officer to review and discuss accommodations to support a safe and healthy workplace. Accommodations may include additional PPE, a workspace reassignment, reassignment of select work responsibilities and assignments, and may be permitted to work remotely when possible.
- Where testing is not required, how employees can access COVID-19 testing?
 - Personnel are encouraged to contact their medical provider for testing recommendations and options.
 - For testing locations in Los Angeles County CLU personnel are encouraged to visit <https://covid19.lacounty.gov/testing/>.
- 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.

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 infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

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 employer-provided sick leave benefits as per Worker's Compensation laws and procedures, Families First Corona Virus Response Act (expired December 31, 2020), Family Medical Leave Act/California Family Rights Act Leave.
- If the employee is required to quarantine due to a work-related exposure, is able to work from home, or if temporary work is unavailable, the employee may be entitled to earning and benefit continuation.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

CLU will follow all local and state law requiring reporting, record keeping and access to records. 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.
- 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, authorized employee representatives, 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.
- Follow Screening and Exposure Decision Pathways for Symptomatic Persons and Contacts of Potentially Infected Persons at Educational Institution (LACDPH) including Contract Tracing, quarantine, isolation, return to school/work protocols.

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.

Support by Senior Management

As the Director at The Center for Learning Unlimited, Inc., I both approve and support this COVID-19 Prevention Plan, 100%.

Virginia Erxleben

Dr. Virginia Erxleben, Director

2/23/2021

Date

Appendix A: COVID-19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Control of COVID-19 Hazards			
Physical distancing			
Face Coverings			
Engineering Controls			
Cleaning and Disinfecting			
Shared Tools, Equipment, and Personal Protective Equipment (PPE)			
Hand Sanitizing			
Personal Protective Equipment (PPE) used to control employees' exposure to COVID-19			

Appendix B: 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: *[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

Name(s) of staff involved in the investigation:

Was COVID-19 test offered?

Date of the positive or negative test and/or diagnosis:



Date and time the COVID-19 case was last present in the workplace:

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 local health department notified:

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