

COVID-19 Prevention Program (CPP) for BASIS Independent Fremont

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

Date: January 26, 2020

Authority and Responsibility

Associate Head of Operations 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.
- 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

All employees are encouraged to participate in identification and evaluation of COVID-19 hazards.

Employee screening

Employees self-screen before arriving on campus. Upon arrival, we measure temperature with contactless thermometers. Employees may enter only after they have a temperature reading that is below 100°F. All employees are required to wear face covering during the screening process. In addition, a Plexiglas barrier has already been installed at the Front Office Lobby between the screener and the employee.

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 by the Associate Head of Operations (AHOPs), who will create a corrections plan by the end of the next day. Furthermore, steps toward correcting the hazard will begin by the end of next day, and the AHOPs will follow-up weekly until the problem has been resolved. Afterwards, we will follow-up a week after the resolution to ensure that standards are still being followed, and to identify any other hazards that may have been introduced from the correction.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we always ensure at least six feet of physical distancing in our workplace by:

- Eliminating the need for workers to be in the workplace wherever possible – e.g., telework or other remote work arrangements.
- Monitoring and restricting the number of employees on campus at any given time. Outside of a core group of employees who are required to be on campus regularly (at least once a week, over a four-week period), we will allow no more than three extra employees on campus at any time.
- Restrict number of employees in the Break Area to two.
- Restrict number of employees in the Front Lobby area to three.
- Restrict number of employees in Work Room to one.
- Desks, chairs, and other miscellaneous furniture have been removed to ensure all staff work areas are at least six feet apart.
- Visual cues, such as signs and floor markings, have been posted all around campus to indicate where employees and others should be located, or their direction and path of travel.
- Approximately half of our restroom stalls and sinks have been cordoned off to help maintain 6 feet 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

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. Employees will also be asked to carry extra masks for themselves at work. Disposable masks, and face shields are also available upon request from the front office area.

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

- While eating and drinking at the workplace, provided employees are at least six feet apart, and if indoors, outside air supply to the area 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 alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

Masks must be worn in any situation where the six feet physical distancing might be compromised between individuals and only in situations where stable cohorts can be maintained.

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

- Circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke. Merv13 filters will be installed with charcoal carbon filters.
- An Air quality measuring device is available onsite.
- Our HVAC units are maintained and tested by a professional qualified vendor.
 - Filters and units periodical maintenance are done every quarter (4x Year).
 - MERV13 filters will be used for the foreseeable future.
 - Coils are cleaned annually (1x year).
- The units are running at maximum efficiency for the installed MERV13 filters. With these filters, the units can pull in 25% fresh air.

Cleaning and disinfecting

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

- Day porter has been hired to clean all public areas about twice a day. Public areas include: Front Lobby, Hallways, Cafeteria, Bathrooms, and Classrooms.
 - In addition, all high touch areas wiped with disinfectant:
 - 36" circle of clean around all doors, door handles, and light switches.
 - Push bar and panic bar hardware on doors.
 - Soap and sanitizing dispensers.
 - All rooms not in use are cleaned periodically to keep them fresh and clean.
 - Regular janitorial vendor also cleans and disinfects every weeknight.
 - Our facilities team also follows up each morning with an Electro-static spray in all spaces that are being used daily.
- **Should we have a COVID-19 case in our workplace, we will implement the following procedures:**
 - (a) The classroom or affected space will be closed for 24 hours.
 - (b) The room will be cleaned and disinfected by onsite by staff the following day.
 - (c) Electro-static application of disinfectant is applied in the room.
 - (d) A final clean will be performed by janitorial staff.

Onsite personnel will be provided with the following PPE's for the clean:

- Coveralls/Bunny suits
- Vinyl, latex, nitrile gloves
- Masks
- Face shields

Shared tools, equipment and personal protective equipment (PPE)

PPE will 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 will not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the last person to use the item. The item in question will be wiped down with sanitary wipes that will be provided by the school. In addition, high touch objects like hallway-facing doorknobs are wiped down regularly with disinfectant by our day-porter, at least twice a day.

Hand sanitizing

To implement effective hand sanitizing procedures, we:

- Evaluated handwashing facilities.
- Encourage and allow time for employee handwashing.
- Provide 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.
- Provide training on handwashing.
- Placed hand sanitizer stations near all areas where staff and student may enter or leave campus.
- Placed hand sanitizer stations at entrances where staff and student may leave one area on campus and enter another area.

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.

We 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 C: Investigating COVID-19 Cases** form.

Employees who had potential COVID-19 exposure in our workplace will be:

- School will offer COVID-19 testing at no cost during their working hours. Our staff insurance will cover the cost of COVID-19 testing at most major testing facility.
- School will also provide the employee with information on benefits described in **Training and Instruction, and Exclusion of COVID-19 Cases**.

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:

- All employees will be trained and encouraged to report COVID-19 symptoms and possible hazards to the Associate Head of Operations, via any means necessary.
- All employees can report symptoms and hazards without fear of reprisal.
- Where testing is not required, employees can access COVID-19 testing at the Bay Area Community Health Center Tri-City Health Center located across the street from the Lower Campus or use the testing provider of their choice. Our health insurance will cover the cost of testing at most testing facilities:

BACH
39500 Liberty St
Fremont, CA 94538

- 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.
- Updated guidance about COVID-19 hazards that employees may be exposed to, and information on what is being done to control those hazards will be provided to employees as they become available during the regular all staff-meeting or via all staff email announcements.

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 hand washing technique.
- 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.

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 offering employees the ability to work from home, ALSQ leave, and standard PTO. Additional needs will be addressed on a case-by-case basis.
- 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.
- 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.

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 degrees 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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Hoang Le
Operations Manager
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