



Inland Leaders Charter School (ILCS)

COVID-19 Prevention Program (CPP)

The COVID-19 Prevention Plan (CPP) is designed to control exposures to the SARS-CoV-2 virus that may occur at Inland Leaders Charter School (ILCS). This plan is subject to local county and state level requirements in regards to mitigating the spread of COVID-19. This plan is intended to follow the California Department of Public Health guidelines for K-12 schools and Cal-OSHA regulations.

Date: 1/27/21; Amended 8/2/21; 8/31/21

Authority and Responsibility

The **Executive Director** has overall authority and responsibility for implementing the provisions of this CPP in the workplace. In addition, all principals, 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

ILCS will implement the following in the 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.
- Students and adults are recommended to conduct health screenings through ParentSquare; here they will indicate if they have had possible COVID-19 exposures and/or are exhibiting symptoms prior to coming to school each day; of course, students who have either an exposure or symptoms are told to stay home until their case may be reviewed by the school nurse. Once the case is reviewed by the nurse, a plan for return is developed.
- Students' temperatures may be taken every day upon entering campus; if a student presents with a fever of 100.4 or greater, the student is isolated and excused from school. Students exhibiting symptoms after arriving at school are taken to an isolation area where the student will be further evaluated; if needed, parents will be called for pickup. Further contact tracing and possible cohort quarantine and closure will be considered.
- Staff exhibiting symptoms are moved into isolation and will be evaluated by school nurse; if determined to be a risk, the staff member will be excused from work and provided information for

testing if they choose to do so.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by promptly reporting any COVID related hazards to their immediate supervisor.

Employee Screening

Staff members are required to self-screen and complete daily temperature checks prior to coming to work. If staff members are experiencing symptoms, they won't attend work and will check in with the school nurse or other designated employee for further direction.

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:

School administration at ILCS will perform spot inspections looking for unhealthy work conditions or practices by staff, students, parents and subcontractors visiting sites. Infractions to any safe working conditions, practices and procedures observed and/or noted in the inspection will be addressed immediately. Hazards particularly assessed will include proper and safe practices when it comes to social distancing, use of PPE, cleanliness/sanitization protocols, and proper supply and stocking of washing and sanitation supplies. The severity of the hazard will always be assessed and the correction time frames will be assigned accordingly. Individuals will be identified as responsible for timely correction and administration will follow-up to ensure the correction occurs in an ample and timely manner.

Employees and families will be notified in the event that there is a potential COVID-19 exposure. Steps will be taken to insure an in-depth contact tracing procedure takes place that identifies all potential exposures. Furthermore, a thorough disinfection for all areas and surfaces exposed will take place. Staff, cohorts and/or individuals may be quarantined until deemed safe.

Physical Distancing

Where possible, ILCS will implement the social distancing recommendations of the California Department of Public Health and Local County Public Health Department.

- Utilizing zones and providing a structure where classes reduce the amount of mixing with other classes
- Reducing the number of persons in an area at one time.
- Visual cues such as signs and floor markings to indicate where staff and students should be located during their path of travel or while waiting to perform various tasks.
- Staggered recess, PE, and break times have been implemented to reduce potential exposure.
- Adjusted work processes or procedures, such as hybrid learning via Zoom platform allowing students to learn remotely from home as needed.
- Additional furniture has been purchased and existing furniture has been reconfigured to allow for physical distancing practices.
- Work meetings may take place via Zoom platform.
- Additional lunch eating areas created to "spread" students on the campus during lunch.

Face Coverings

ILCS will follow the current face covering guidance published by the CDPH and local county public health department. Although staff and students will typically supply their own face coverings, additional face coverings for adults and children will be available at the front gate or in the office. Classrooms will have additional masks available as well. In addition, students may have temperature checks performed on a daily basis prior to school entry, along with a daily health screening form completed by a parent. Stricter quarantine and testing protocols may also apply to students without masks in the event of exposure to COVID-19.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least three feet apart and outside air supply to the area.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- 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.
- While outdoors

Enforcement of Face Covering Mandates

Based on state regulations, ILCS will enforce face covering mandates when required by the state and county health department. Students and staff may provide a written medical exemption for cloth face coverings to allow for an alternative face shield approved by a physician as allowed by CDPH. Students will be checked for masks prior to entering class in the morning. The following steps describe the process for enforcing the mask mandate in detail.

Students:

Step 1: Students without a face covering will be reminded to wear their face covering and provided a face covering in the event the student does not have one.

Step 2: Counsel student in regards to consequences for not wearing a face covering.

Step 3: Students that refuse to wear a mask will be sent to the office and administration will contact parent for their support in the student wearing a mask. If parent is not supportive, they will be directed to pick up student up from school.

Step 4: After 3 trips to the school office for non-mask compliance the parent will be recommended to enroll their student into independent study until the mask mandate is removed or they are able to comply. Parent to be referred to Student Contract Accountability Team.

Staff:

Staff that are not compliant with the mask mandate will be provided with a verbal warning after the 1st infraction, written warning for the 2nd infraction, and will be removed from their duties if non-compliance continues.

Volunteers/Visitors

All volunteers and visitors will be required to follow mask mandates to remain on campus. Volunteers and visitors who are non-compliant will not be allowed on campus.

Cleaning and Disinfecting

ILCS implements the following cleaning and disinfection measures for frequently touched surfaces based on guidance from CDPH. ILCS recognizes the CSC guidance in regards to the over-use of disinfectant products and the need for more regular cleaning to limit exposure to harmful materials.

- All desks, chairs, tables, and other common touching surfaces (door handles, sink faucets) are cleaned daily.

- Electrostatic cleaning sprayers are used on a weekly basis for desks, chairs, common touch points and countertops.
- Cleaning supplies are frequently monitored to ensure ample product is available at all times.
- Proper PPE for cleaning/disinfecting will be provided for staff.
- All employees have been trained in the proper use of disinfectants through the CA Department of Pesticide Regulation.
- Plans, routines and schedules have been developed to maximize sanitation and cleanliness efforts.
- Cleaning and disinfecting kits have been placed in all classrooms and offices.
- All playground equipment and eating areas will be cleaned and disinfected after each use.

Should ILCS have a COVID-19 case in the workplace the following procedures will be implemented:

- Areas of exposure will be identified.
- Thorough contact tracing will be carried out.
- Trained custodial staff will conduct intensive cleaning and disinfecting of all surfaces.
- Area may remain closed for an extended period of time.
- Class or cohort closure for distance learning will be considered.
- Additional quarantines for other staff and students who had exposure to the individual will likely be administered.
- Immediate report to the county public health department for further guidance

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared at any time, 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 utilizing cleaning and disinfecting products provided. All employees received training for safe and effective practices for disinfection and cleaning.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Installed handwashing stations to accommodate a greater number of students and staff.
- Hand washing times embedded in the daily schedule for all students and staff.
- Hand washing times staggered to minimize exposure for students and staff.
- Stations checked daily for ample stock supply such as soap and paper towels.
- Social distance lanes with appropriate markings set up to accommodate students who are waiting in line awaiting use of the handwashing station.
- All staff are encouraged to and allowed time for handwashing for at least 20 seconds at a time.
- Hand sanitizing stations have been placed throughout the campus including placement in all classrooms.

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 **Staff COVID Contact Tracing Spreadsheet**.

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

- Notified within 24 hours of possible exposure.
- Offered COVID-19 testing at no cost during their working hours.
- Allowed to work from home if not sick and able to work remotely.
- Information on benefits, eligibility and accommodation for COVID-19 cases will be provided.
- Plans will be developed for safe return.

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 will report COVID-19 symptoms and possible hazards to their immediate supervisor or school nurse. This will take place via email or phone call.
- Employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies will accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Employees will be encouraged to receive a COVID-19 test; they will further be given guidance on nearby locations.
- In the event ILCS 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 not be responsible for testing fees.
- 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 will be sent out on an as needed basis through bulletins and/or emails.
- Provide continued information in regards to vaccinations.

Training and Instruction

ILCS will provide effective training and instruction that includes:

- 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 and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel indoors, so physical distancing 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.
- Methods of handling a student who is or is possibly infected with the virus including proper use of PPE.
- Inland Leaders will have rosters available for all mandatory training regarding COVID-19 information and safety.

Exclusion of Staff COVID-19 Cases

When ILCS has a COVID-19 case in its workplace, transmission will be minimized by:

- Ensuring that COVID-19 cases or exposures are excluded from the workplace until return-to-work requirements are met.
- 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.
- Providing employees at the time of exclusion with information on available benefits.

Quarantine process

Quarantine protocols follow the CDC guidelines listed below.

Vaccinated close contacts

- For those who are vaccinated, follow the [CDPH Fully Vaccinated People Guidance](#) regarding quarantine.
- Refrain from quarantine and testing following a known exposure if asymptomatic [2].
 - Following a known exposure at work, fully vaccinated workers do not need to quarantine if asymptomatic.
 - In the workplace, employers subject to the [Cal/OSHA COVID-19 Prevention Emergency Temporary Standards \(ETS\)](#) must ensure that employees are following the current ETS face covering and testing requirements.

Unvaccinated students/staff for exposures when both parties were wearing a mask, as required in K-12 indoor settings. These are adapted from the [CDC K-12 guidance](#) and [CDC definition of a close contact](#).

When both parties were wearing a mask in the indoor classroom setting, unvaccinated students who are close contacts (more than 15 minutes over a 24-hour period within 0-6 feet indoors) may undergo a modified 10-day quarantine as follows. They may continue to attend school for in-person instruction if they:

- Are asymptomatic;
- Continue to appropriately mask, as required;
- Undergo at least twice weekly testing during the 10-day quarantine; and
- Continue to quarantine for all extracurricular activities at school, including sports, and activities within the community setting.

Quarantine for unvaccinated [close contacts](#) who were not wearing masks or for whom the infected individual was not wearing a mask during the indoor exposure continue a 14 day quarantine protocol as per CDC guidance.

For these contacts, those who remain asymptomatic, meaning they have NOT had any symptoms, may

discontinue self-quarantine under the following conditions:

- Quarantine can end after Day 10 from the date of last exposure without testing; OR
- Quarantine can end after Day 7 if a diagnostic specimen is collected after Day 5 from the date of last exposure and tests negative.

To discontinue quarantine before 14 days following last known exposure, asymptomatic close contacts must:

- Continue daily self-monitoring for symptoms through Day 14 from last known exposure; AND
- Follow all recommended non-pharmaceutical interventions (e.g., wearing a mask when around others, hand washing, avoiding crowds) through Day 14 from last known exposure.
- If any symptoms develop during this 14-day period, the exposed person must immediately isolate, get tested and contact their healthcare provider with any questions regarding their care.

TESTING

ILCS will follow current state mandates that require vaccinations of volunteers and workers at the school sites or required weekly testing.

CDPH has a robust school testing program and subject matter experts available to support school decision-making, including free testing resources to support screening testing programs (software, test kits, shipping, testing, etc.).

Resources for schools interested in testing include: California's Testing Task Force [K-12 Schools Testing Program](#) and [K-12 school-based COVID-19 testing strategies](#); The Safe Schools for [All state technical assistance \(TA\)](#) portal; and the [CDC K-12 School Guidance](#) screening testing considerations that are specific to the school setting.

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. This can be found at https://dphsbcountry.co1.qualtrics.com/jfe/form/SV_1KPbjRQPDXXOjDD
- 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.
- Utilize internal Staff COVID Contact Tracing Spreadsheet.
- Monitor and maintain Student Health Screening Form data.

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; if the case develops symptoms, the return date will include a minimum of 10 days passed starting when symptoms first develop.

- 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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*This safety plan may need to be amended based on new guidance from the CDPH or local county public health department.

Appendix B: COVID-19 Inspections

Date: []

Name of person conducting the inspection: []

Work location/s 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			
Administrative			
Physical distancing (Staff)			
Physical distancing (Students)			
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			
Signs Posted			
Barriers and safety zones adequately marked			
PPE (not shared, available and being worn)			
Face coverings worn properly			
Gloves			
Face shields/goggles			
Respiratory protection			

Appendix C: Investigating COVID-19 Cases

ILCS will investigate and track all COVID-19 related cases through its Staff and Student COVID Contact Tracing Spreadsheets 2020-2021. 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.

Information Collected in the Spreadsheet for Investigation will Include:

- **Employee/Student Name**
- **Date**
- **Date of Symptoms**
- **Locations Occupied**
- **Testing Information/Outcome**
- **Exposure Date**
- **Date of Return to Work/School**
- **Others in Contact**
- **Documentation of Alerting Other Employees for Potential Exposure**
- **Notes to Investigation and Actions Taken**

Additional Consideration #1

Multiple COVID-19 Infections and 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 14-day period.

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 a 14-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 14-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**.

All sections of this plan will be subject to the California Department of Public Health and California Occupational Safety and Health Administration requirements.