



Delphi Academy[®]
of Los Angeles

COVID-19
Prevention
Program (CPP)

COVID-19 Prevention Program (CPP) ***for Delphi Academy of Los Angeles***

Purpose

The purpose of this CPP is to provide employees with a healthy and safe workplace, and to control exposures to the SARS-CoV-2 virus that may occur.

Authority and Responsibility

Head of School, Karen Dale, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all Directors 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.

SYSTEM FOR COMMUNICATING

Our goal is to ensure that we have effective two-way communication with staff in a form they can readily understand, and that it includes the following information:

- Staff should report COVID-19 symptoms and possible hazards to the Head of School.
- Staff can report symptoms and hazards without fear of reprisal.
- We make every effort to accommodate employees with medical or other conditions that put them at increased risk of severe COVID-19 illness
- The school does not provide COVID-19 testing, staff should access it through health plans or local testing centers.
- 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 staff the reason for the testing and the possible consequences of a positive test. This plan will include how this will be accomplished at no cost to the employee during working hours.

ROUTINE PREVENTION

Employee screening

All staff perform a symptoms check upon arrival each day. This includes taking their temperature with a no-touch thermometer and checking for COVID-19 symptoms.

Should a staff member present COVID-19 symptoms during this screening, they will be instructed to return home and not report to work until they satisfy the minimum Return-to-Work Criteria (noted in program below).

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times by:

- Reducing the number of persons in an area at one time.
- Signs and floor markings that indicate where staff and others should be located.
- Staggered break times.

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 if needed, 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.

Violations are addressed when observed, and reported to the Head of School to determine whether or not additional corrective measures are needed.

The following are exceptions to the use of face coverings:

- When a staff member is alone in a room.
- While eating and drinking at the workplace provided staff are at least six feet apart, and if inside, an outside air supply to the area has been maximized to the extent possible.
- If the staff member has a medical reason not to wear a mask, in which case they must wear a face shield with a protective drape along the bottom front.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.
- Encourage and allow time for handwashing.

Cleaning and disinfecting

Office and classroom surfaces and high touch areas in the classroom are disinfected several times throughout the day with non-toxic EPA approved disinfectants, which are provided to all staff.

Student bathrooms are disinfected 3 times each day.

Each classroom (surfaces, furniture, and toys) is cleaned and disinfected at the end of each day.

Outdoor play equipment is cleaned once a week

The classrooms are fogged with a non-toxic EPA-approved cleaner at least once a week, to supplement the daily cleaning and disinfecting regimen.

In the event of a positive case of COVID-19 on campus, the affected room(s) will be closed off for 24 hours. The area and materials will then be thoroughly cleaned and disinfected.

Shared tools, equipment and personal protective equipment (PPE)

PPE (face masks, face shields, gloves) must not be shared.

Items that staff 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.

Other engineering controls

We implement the use of plastic barriers for situations where we cannot maintain at least six feet between individuals.

We maximize, to the extent feasible, the quantity of outside air for our buildings by keeping doors and windows open, weather permitting.

Outdoor learning is encouraged as much as feasible.

The school has installed an air purifying device in our air duct system that destroys viruses, bacteria, mold, allergens and other particles, to ensure the classroom air is exceptionally clean and to promote an overall healthier environment.

INVESTIGATING AND RESPONDING TO 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 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.

Exclusion of COVID-19 Cases

In the event of COVID-19 case on campus:

- The COVID-19 case is excluded from the workplace until the return-to-work criteria are met (see Return-to-Work Criteria below)
- They will continue and maintain employee earnings, seniority, and all other employee rights and benefits whenever it's been demonstrated that the COVID-19 exposure is work related.
- If possible, the school will interview the positive case to determine the nature and circumstance of any contact they had with other employees. If it is determined there was any close-contact, those individuals will be asked to remain at home and not return to work until they satisfy the minimum criteria to return to work as noted below.

In the event of a staff member who has had potential COVID-19 exposure:

- The close-contact is excluded from the workplace until the return-to-work criteria are met (see Return-to-Work Criteria below).

Information on COVID cases will be kept updated on the [Investigating COVID-19 Cases](#) form.

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

Return-to-Work Criteria

Positive 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.

Positive COVID-19 cases with no 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.

Close-contact exposure to a positive COVID-19 case will not return to work until:

- ten days have passed since the last exposure.

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.

Employees Who Are Able to Telework During Isolation or Quarantine

The School will allow employees who are able to telework, and are able and available to work, to telework during the isolation or quarantine period. The School will provide these employees their normal compensation for the work that they perform for the School during the isolation or quarantine period.

Reporting, Recordkeeping, and Access

It is our policy to:

Report information about COVID-19 cases on campus to the local health department whenever required by law, and provide any related information requested by the local health department.

Make our written COVID-19 Prevention Program available to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request

Use the 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.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

Inspection for COVID-19 Hazards

- Workplace-specific evaluations using the Identification of COVID-19 Hazards form.
- Evaluate employees' potential workplace exposures to all persons at 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 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.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **COVID-19 Inspections** form. The severity of the hazard will be assessed, and the correction frame will be assigned accordingly. Follow-up measures will be taken to ensure timely correction.

TRAINING AND INSTRUCTION

We 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 there is not 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.

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 on campus for a 14-day period.

COVID-19 testing

- COVID-19 testing will be provided to all staff 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. The testing provided will be at no cost to employees and may be done during employees' working hours.
- COVID-19 testing consists of the following:
 - All staff in our exposed workplace will be 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, weekly tests will be provided for staff who remain at the workplace, 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.
 - Additional testing will be provided when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and staff who had exposure to COVID-19 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.

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 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.

COVID-19 Inspections

Name of person conducting the inspection: _____ Date: _____

Work location evaluated: _____

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Barriers/partitions in classrooms and reception			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
Individual student material kits available and used			
Office materials and equipment (not shared)			
Number of people per room limited			
Physical distancing adhered to			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Masks worn consistently and properly			
Bathroom disinfecting done daily			
Surface cleaning and disinfection (includes doors, windows, high-touch areas)			
Classroom materials (including toys) cleaning and disinfection			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
Disinfectant fogging weekly			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields with fabric drape			

Investigating COVID-19 Cases

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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.

Name of person conducting the investigation: _____ Date: _____

Employee name:		Employee name:	
Position:		Position:	
Date investigation was initiated:		Date investigation was initiated:	
Location where employee works:		Location where employee works:	
Date the case first had one or more COVID-19 symptoms:		Date the case first had one or more COVID-19 symptoms:	
Date and time last present in the workplace:		Date and time last present in the workplace:	
Date of test (note positive or negative)		Date of test (note positive or negative)	
Employees who were exposed:		Employees who were exposed:	

What workplace conditions 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:	

