



**Bayhill High School**  
COVID Prevention Plan  
Updated 9/2022

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

**Description of Workplace**

Bayhill High School occupies the school and annex buildings of the Calvary Presbyterian Church at 1940 Virginia Street, Berkeley, CA. The building is heated by radiant heat from the floors. There is no air conditioning. Every room has windows that open to the outside. The facility receives an annual fire inspection and elevator inspection. Any identified safety issues are corrected immediately, whether it is the responsibility of the School or the church. A Facilities Manager is employed full-time by the School.

Bayhill follows the directives from the City of Berkeley, the Alameda County Department of Public Health, and the California State Departments of Education, Public Health, and CAL-OSHA.

**Authority and Responsibility**

The Executive 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.

Bayhill will make every effort to prevent the spread of Covid on our campus and at any related activities or outings.



## I. PURPOSE:

The purpose of the Bayhill High School’s COVID-19 Prevention Program (“CPP”) is to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Lab. Code §§ 6300, et seq.) and associated regulations (8 C.C.R. § 3205).

Nothing in this CPP precludes the Bayhill High School from complying with federal, state, or local laws or public health order or guidance that may recommend or require measures that are more prescriptive and/or restrictive than those that are provided herein.

## II. SCOPE

Unless one of the exceptions provided below applies, this CPP shall apply to all Bayhill High School employees (hereinafter referred to as “employees”).

The following employees are exempt from coverage under the CPP: (1) Employees who are teleworking from home or a location of the employee’s choice that is not under the control of the [School]; (2) Employees who are working in or at a work location and do not have contact with any other individuals; and (3) Employees that because of their tasks, activities or work location have occupational exposure as defined by the Aerosol Transmissible Diseases (“ATD”) regulation (i.e., 8 C.C.R. § 5199).

## III. DEFINITIONS:

For the purposes of the CPP, the following definitions shall apply:

“Close contact COVID-19 exposure” means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the infectious period as defined here. This definition applies regardless of the use of face coverings, unless close contact is defined by regulation or order of the CDPH. If so, the CDPH definition shall apply. Employees who were wearing a respirator as required by the [School] and who used such respirator in compliance with Title 8 Section 5144 during contact with a COVID-19 case will be deemed not to have had close contact COVID-19 exposure.



“COVID-19” means the disease caused by severe acute respiratory syndrome coronavirus 2 (“SARS-CoV-2”).

“COVID-19 case” means a person who either: (1) Has a positive COVID-19 test; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; (3) Has a positive COVID-19 diagnosis from a licensed health care provider; or (4) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

“COVID-19 hazard” means potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, or sneezing, or from procedures performed on persons which may aerosolize saliva or respiratory tract fluids. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a test for SARS-CoV-2 that is:

- (1) Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the United States Food and Drug Administration (FDA) to detect current infection with the SARS-CoV-2 virus (e.g., a viral test); and
- (2) Administered in accordance with the authorized instructions;



“Exposed group” means all employees at a work location, working area, or a common area at work, where a COVID-19 case was present at any time during the infectious period. However, if the COVID-19 case visited a work location, working area, or a common area at work for less than 15 minutes during the infectious period, and all employees were wearing face coverings at the time the COVID-19 case was present, other people at the work location, working area, or common area would not constitute part of the exposed group. Common areas at work includes bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas. However, places where employees momentarily pass through while everyone is wearing face coverings, without congregating, is not a work location, working area, or a common area at work.

“Face covering” means a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers that completely covers the nose and mouth and is secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they shall have two layers of fabric or be folded to make two layers. A face covering is a solid piece of material without slits, visible holes, or punctures, and must fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face. A face covering does not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric. This definition includes clear face coverings or cloth face coverings with a clear plastic panel that otherwise meet this definition and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker’s mouth or facial expressions to understand speech or sign language respectively.

“Infectious period” means the following time period, unless otherwise defined by California Department of Public Health (“CDPH”) regulation or order, in which case the CDPH definition shall apply: For COVID-19 cases who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until each of the following are true: (1) it has been ten (10) days since symptoms first appeared; (2) 24 hours have passed with no fever, without the use of fever-reducing medications; and (3) symptoms have improved; or For COVID-19 cases who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

“Respirator” means a respiratory protection device approved by the National Institute for Occupational Safety and Health (“NIOSH”) to protect the wearer from particulate matter, such as an N95 filtering facepiece respirator.



“Returned case” means a COVID-19 case who returned to work pursuant to Section IV.(J) and did not develop any COVID-19 symptoms after returning. A person shall only be considered a returned case for 90 days after the initial onset of COVID-19 symptoms or, if the person never developed COVID-19 symptoms, for 90 days after the first positive test. If a period of other than 90 days is required by a CDPH regulation or order, that period shall apply.

“Worksite,” for the limited purposes of COVID-19 prevention regulations only, means the building, store, facility, agricultural field, or other location where a COVID-19 case was present during the infectious period. It does not apply to buildings, floors, or other locations of the employer that a COVID-19 case did not enter, locations where the worker worked by themselves without exposure to other employees, or to a worker's personal residence or alternative work location chosen by the worker when working remotely.

“Workplace Coordinator means the individual assigned by Bayhill High School who will be responsible for COVID-19 issues on Bayhill High School's behalf.

#### IV. PROGRAM

##### A. SYSTEM FOR COMMUNICATING WITH EMPLOYEES

###### 1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at [School] Worksites and Facilities

Bayhill High School requires that employees immediately report to their manager or supervisor or to the Executive Director any of the following: (1) the employee’s presentation of COVID-19 symptoms; (2) the employee’s possible COVID-19 close contact exposures; (3) possible COVID-19 hazards at Bayhill High School worksites or facilities.

Bayhill High School has not and will not discriminate or retaliate against any employee who makes such a report.

###### 2. Accommodations Process for Employees with Medical or Other Conditions that Put them at Increased Risk of Severe COVID-19 Illness



The [School] provides for an accommodation process for employees who have a medical or other condition identified by the Centers for Disease Control and Prevention (“CDC”) or the employees’ health care provider as placing or potentially placing the employees at increased risk of severe COVID-19 illness.

For all employees who request such an accommodation, including fully vaccinated employees, the [School] will require that the employee provide information from the employee’s health care provider explaining why the employee requires an accommodation.

The CDC identifies the following medical conditions and other conditions as placing or potentially placing individuals at an increased risk of severe COVID-19 illness

The CDC guidance provides that adults of any age with the following conditions are at increased risk of severe illness from the virus that causes COVID-19:

1. Cancer
2. Chronic kidney disease
3. COPD (chronic obstructive pulmonary disease)
4. Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
5. Immunocompromised state (weakened immune system) from solid organ transplant
6. Obesity (body mass index [BMI] of 30 kg/m<sup>2</sup> or higher but < 40 kg/m<sup>2</sup>)
7. Severe Obesity (BMI ≥ 40 kg/m<sup>2</sup>)
8. Pregnancy
9. Sickle cell disease
10. Smoking
11. Type 2 diabetes mellitus

The CDC guidance also provides that adults of any age with the following conditions might be at an increased risk for severe illness from the virus that causes COVID-19:

1. Asthma (moderate-to-severe)
2. Cerebrovascular disease (affects blood vessels and blood supply to the brain)
3. Cystic fibrosis
4. Hypertension or high blood pressure



5. Immunocompromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines
6. Neurologic conditions, such as dementia
7. Liver disease
8. Overweight (BMI > 25 kg/m<sup>2</sup>, but < 30 kg/m<sup>2</sup>)
9. Pulmonary fibrosis (having damaged or scarred lung tissues)
10. Thalassemia (a type of blood disorder)
11. Type 1 diabetes mellitus



Bayhill High School periodically reviews the following web address in order to account for any additional medical conditions and other conditions that the CDC has identified as placing or potentially placing individuals at an increased risk of severe COVID-19:

<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html> (Last updated on December 14, 2021).

Employees are encouraged to review the list of medical conditions and other condition provided above in order to determine whether they have such a condition.

To request accommodation, employees may make a request with the Executive Director.

### 3. COVID-19 Testing

The [School] possesses authority to require that employees who report to work at [School] worksites or facilities be tested for COVID-19.

Where Bayhill High School requires testing, the school has adopted policies and procedures that ensure the confidentiality of employees' medical information and comply with the Confidentiality of Medical Information Act ("CMIA"). Specifically, Bayhill High School will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, unless expressly authorized by the employee to disclose such information or as other permitted or required under the law.

### 4. COVID-19 Hazards

Bayhill High School will notify employees and subcontracted employees of any potential COVID-19 exposure at Bayhill High School worksite where a COVID-19 case and employees were present on the same day. TBayhill High School will notify employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

Bayhill High School will also notify employees of cleaning and disinfecting measures the Bayhill High School is undertaking in order to ensure the health and safety of Bayhill High School worksite where the potential exposure occurred.

B. Identification and evaluation of covid-19 hazards at Bayhill high school worksites and facilities





1. Screening Employees for COVID-19 Symptoms

Bayhill High School possesses the authority to screen employees or require that employees self-screen for COVID-19 symptoms.

Bayhill provides that either the School will screen employees for COVID-19 symptoms prior to their entering the School worksites and facilities or employees will self-screen for COVID-19 symptoms prior to reporting to any School worksite.

2. Responding to Employees with COVID-19 Symptoms

Should an employee present COVID-19 symptoms during a Bayhill High School -administered screening or a self-scrree], the employee must remain at or return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria in order to return to work (as discussed in Section IV.J. of this CPP).

Bayhill High School will advise employees of any leaves to which they may be entitled during this self-quarantine period.

Further, the [School] has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA, and the [School] will not disclose to other employees the fact that the employees presented COVID-19 symptoms.

3. Bayhill High School's Response to COVID-19 Cases

In the event that an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, the [School] will instruct the employee to remain at or return to their home or place of residence and not report to work until such time as they satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

Bayhill High School will advise employees of any leaves to which they may be entitled during this self-isolation period.



The [School] complies fully and faithfully with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and entities as required based on the individual circumstances: (1) The local health department; (2) Cal/OSHA; (3) Employees who were present at a [School] worksite when a COVID-19 case was present; (4) Employee organizations that represent employees at the [School] worksite; (4) Employers of any subcontracted employees who were present at the [School] worksite; and (5) The [School]’s workers’ compensation plan administrator.

If possible, the [School] will interview the COVID-19 case(s) in order to ascertain the nature and circumstances of any contact that the employee(s) had or may have had with other employees during the infectious exposure period. If the [School] determines that there were any close contact COVID-19 exposures, the [School] will, as necessary, instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

The [School] has adopted policies and procedures that will ensure the confidentiality of employees and comply with the CMIA. Specifically, the [School] will not disclose to other employees, except for those who need to know, the fact that the employee(s) tested positive for or were diagnosed with COVID-19. Further, the [School] will keep confidential all personal identifying information of COVID-19 cases or persons, unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

#### 4. Workplace-Specific Identification of COVID-19 Hazards

The [School] will periodically conduct workplace-specific assessments of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the [School] identified places (work locations, work areas, and common areas) and times when employees and individuals congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.



Bayhill High School will provide notice of any such potential workplace exposure to all persons at Bayhill High School worksites and facilities, including employees, employees of other entities, and independent contractors. Bayhill High School considered how employees and other persons enter, leave, and travel through Bayhill High School worksites and facilities, in addition to addressing employees' stationary workspaces or workstations.

Further, Bayhill High School will treat all persons, regardless of the presentation of COVID-19 symptoms or COVID-19 status, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

For indoor Bayhill High School worksites and facilities, Bayhill High School evaluates how to maximize the ventilation of outdoor air; provide the highest level of filtration efficiency compatible with the worksites and facilities' existing ventilation systems; and whether the use of portable or mounted High Efficiency Particulate Air ("HEPA") filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission.

6. Bayhill High School Compliance with Applicable State and Local Health Orders

Bayhill High School monitors applicable public health orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention.

Bayhill High School fully and faithfully complies with all applicable orders and guidance from the State of California and the local health department.

7. Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls

Periodically, Bayhill High School evaluates existing COVID-19 prevention controls at the workplace and assess whether different and/or additional controls may be needed.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment ("PPE") (as discussed at Section VI, subsections D, and F-H of this CPP).

8. Periodic Inspections



Bayhill High School conducts periodic inspections of School worksites and facilities as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the School's COVID-19 policies and procedures, including, but not limited to this CPP.

## C. INVESTIGATING AND RESPONDING TO COVID-19 CASES IN [SCHOOL] WORKSITES AND FACILITIES

### 1. Procedure to Investigate COVID-19 Cases

The [School] developed a procedure for investigating COVID-19 cases in the workplace, which provides for the following: (1) requesting information from employees regarding COVID-19 cases; (2) contact tracing of employees who may have had a close contact COVID-19 exposure; (3) requesting COVID-19 test results from employees who may have had a close contact COVID-19 exposure; (4) requesting information from employees regarding the presentation of COVID-19 symptoms; and (5) identifying and recording all COVID-19 cases.

### 2. Response to COVID-19 Cases

As provided above at Section IV.B.3., in the event that an employee tests positive for COVID-19 or is diagnosed with COVID-19 by a health care provider, Bayhill High School will instruct the employee to remain at or return to their home or place of residence and not report to an [School] worksite until such time as the employees satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP).

#### a. Contact Tracing

If possible, Bayhill High School will interview the COVID-19 case(s) in order to ascertain the following information: (1) the date on which the employee(s) tested positive, if asymptomatic, or the date on which the employee(s) first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 case(s) recent work history, including the day and time they were last present at a [School] worksite; and (3) the nature and circumstances of the COVID-19 case(s)' contact with other employees during the infectious exposure period, including whether any such contact qualifies as a close contact COVID-19 exposure.



If Bayhill High School determines that there was or were any close contact COVID-19 exposures, the School will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work (as discussed in Section IV.J. of this CPP). Further, the [School] will instruct those employees to be tested for COVID-19, and that the [School] will provide for such testing during paid time, as discussed in subsection c. below.

b. Reporting the Potential Exposure to Other Employees

The [School] fully and faithfully complies with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the individuals and entities described below.

Within one (1) business day of the time Bayhill High School knew or should have known of a COVID-19 case, the School will give written notice of a potential workplace exposure to the following individuals: (1) All employees on the premises at the same worksite as the COVID-19 case during the COVID-19 case's infectious period; (2) Independent contractors on the premises at the same worksite as the COVID-19 case during the COVID-19 case's infectious period; and (3) Other employers at the worksite during the COVID-19 case's infectious period. Bayhill High School will provide notice by either personal service, email, or text message.

Bayhill High School's notice(s) will not reveal any personal identifying information of the COVID-19 case. The notice will include information about the School's cleaning and disinfection plan.

Within one (1) business day of the time Bayhill High School knew or should have known of the COVID-19 case, the School will also provide the notice of the potential workplace exposure to the authorized representative of any employee who was on the premises at the same worksite as the COVID-19 case during the infectious period.

c. Offer of Free COVID-19 Testing Following a Close Contact COVID-19 Exposure



Bayhill High School makes COVID-19 testing available at no cost to employees to all employees who had a close contact COVID-19 exposure at a Bayhill High School worksite. The [School] will offer employees COVID-19 testing during paid time, whether during the employee's regular work schedule or otherwise, and will provide compensation for the time that the employee spends waiting for and being tested.

Bayhill High School will not provide free COVID-19 testing to returned cases.

d. Leave and Compensation Benefits for Close Contact Exposures

Bayhill High School provides employees that had a close contact COVID-19 exposure with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local law, the [School]'s own leave policies, and leave guaranteed by contract.

Bayhill High School will continue and maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employees' right to their former job status, as if the employees had not been removed from their jobs.

Bayhill High School may require that these employees use [School] -provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

e. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure

Bayhill High School will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what may be done to reduce exposure to such COVID-19 hazards, if any.

3. Confidential Medical Information

The [School] will protect the confidentiality of the COVID-19 cases, and will not disclose to other employees the fact that the employees tested positive for or were diagnosed with COVID-19.



The [School] will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

#### D. CORRECTION OF COVID-19 HAZARDS AT Bayhill High School WORKSITES AND FACILITIES

Bayhill High School will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to the identification and evaluation of COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This also includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and PPE.

#### E. TRAINING AND INSTRUCTION OF EMPLOYEES

##### 1. COVID-19 Symptoms

Bayhill High School provides employees training and instruction on COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

Bayhill High School monitors and adheres to guidance issued by the CDC concerning COVID-19 symptoms, including guidance provided at the following web address: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>. Bayhill High School will advise employees in the event that the CDC revises the symptoms that its associates with COVID-19.



In addition to providing training and instruction on COVID-19 symptoms, the [School] provides information and instruction on the importance of employees not coming to work if they have any COVID-19 symptoms. As discussed below, Bayhill High School provides information on paid leaves to which employees may be entitled if they are experiencing a COVID-19 symptom and would like to be tested for COVID-19.

## 2. COVID-19 Vaccinations

Bayhill High School provides employees information and instruction on the fact that COVID-19 vaccines are effective at both preventing the transmission of the virus that causes COVID-19 and preventing serious illness or death, and how employees may receive paid leave for reasons related to COVID-19 vaccinations.

As discussed below, Bayhill High School provides information on paid leaves to which employees may be entitled in order for them to be vaccinated and in the event that they experience any illness or adverse effects as a result of such vaccination.

## 3. Bayhill High School's COVID-19 Policies and Procedures

Bayhill High School provides regular updates to employees on the School's policies and procedures adopted in order to prevent COVID-19 hazards at Bayhill High School worksites and facilities, how such policies and procedures are intended to protect the health and safety of employees and Bayhill High School worksites and facilities, and how employees may participate in the identification and evaluation of COVID-19 hazards in order to make such worksites and facilities healthier and safer for themselves and others.

## 4. COVID-19 Related Benefits

Bayhill High School advises and provides updates to employees on the leaves to which employees may be entitled under applicable federal, state, or local laws as well as the School's own leave policies.





Further, when employees require leave in order to receive a COVID-19 test or to be vaccinated or are directed not to report to work by Bayhill High School for reasons related to the presentation of COVID-19 symptoms, a COVID-19 case, close contact COVID-19 exposure, the School will advise the employees of the leaves to which the employees may be entitled for that specific reason.

5. Spread and Transmission of the Virus that Causes COVID-19

Bayhill High School advises and provides updates to employees about the known spread and transmission of COVID-19. The [School] specifically advises employees of the following: (1) that COVID-19 is an infectious respiratory disease; (2) that the virus that causes COVID-19 can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; (3) that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including hand washing, in order to be effective; (4) that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and (5) that an infectious person may have no COVID-19 symptoms or be pre-symptomatic.

6. Hand Hygiene, and Face Coverings and Respirators

Bayhill High School advises employees of the importance of physical distancing, face coverings, and hand hygiene, including hand washing, and instructs employees that the combination of physical distancing, face coverings, increased ventilation indoors, and respiratory protection make such preventative measures most effective.



With respect to hand hygiene, the School provides employees information regarding the importance of frequent hand washing, that hand washing is most effective when soap and water are used and the employees washes for at least 20 seconds. Bayhill High School instructs employees to use hand sanitizer when employees do not have immediate access to a hand washing facility (i.e., a sink) and that hand sanitizer will not be effective if the employee's hands are soiled.

With respect to face coverings and respirators, Bayhill High School provides employees information on the benefits of face coverings, both to themselves and to others. The School also provides employees instructions on the proper use of face coverings and the differences between face coverings and respirators.

Upon request, Bayhill High School will provide employees respirators for their use at work. At such time as the School provides respirators to employees for their use, it will provide such employees training on the proper use of such respirators, including, but not limited to, how to properly wear the respirator and the method by which employees may check the seal of such respirator in conformance with the manufacturer's instructions.

Bayhill High School will provide training on the conditions under which face coverings must be worn at the workplace and that employees can request face coverings from the School at no cost to the employee and can wear them at work, regardless of vaccination status, without fear of retaliation.

## F. FACE COVERINGS

### 1. General Face Covering Requirements

Bayhill High School provides face coverings to all employees who are not fully vaccinated and requires that such face coverings are worn by employees when indoors or in vehicles, unless certain conditions are satisfied, as explained below.

Bayhill High School adheres to the most restrictive or prescriptive public health order provided by the CDC, CDPH or the local health department applicable to the School, and will provide face coverings and ensure they are worn by employees when required by orders from the CDPH.



Bayhill High School requires that employees face coverings be clean and undamaged. The School allows employees to use face shields to supplement, not supplant, face coverings.

2. Limited Exceptions

The [School] provides for the following exceptions to the face coverings requirement when face coverings are required by orders from the CDPH:

1. When an employee is alone in a room (e.g., alone in an office or another space with walls that extend from the floor to the ceiling and a door that may be closed in order to close the space to others) or vehicle;
2. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent feasible.
3. Employees wearing respirators required by tBayhill High School and being used in compliance with the regulatory requirements for the use of such respirators.
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.
5. 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.

3. Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement

When face coverings are required by orders from the CDPH, Bayhill High School requires that its employees who are exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

4. Weekly Testing Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative



Bayhill High School requires that any employees not wearing a face covering due to the exception identified in Subsection 2 above, and not wearing a face shield with a drape or other effective alternative as described in Subsection 3 above, shall be tested at least weekly for COVID-19 during paid time and at no cost to the employee or are fully vaccinated.

In situations where a face covering is otherwise required, face coverings must be worn, and the exceptions to face coverings contained in this section no longer apply.

However, Bayhill High School does not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

5. Prohibition on Preventing Employees from Wearing Face Covering

Bayhill High School does not prevent any employee from wearing a face covering when wearing a face covering is not required by this section, unless not wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

6. Communication to Non-Employees Regarding Face Covering Requirement

Bayhill High School posts signage to inform non-employees of Bayhill High School requirements concerning the use of face coverings at School worksites and facilities.

G. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Maximization of Outdoor Air

As provided above at Section IV.B.5., for indoor Bayhill High School worksites and facilities, the School evaluated how to maximize the quantity of outdoor air.



Further, for [School] worksites and facilities with mechanical or natural ventilation, or both, the [School] maximizes the quantity of outside air provided to the extent feasible, except when the Environmental Protection Agency (“EPA”) Air Quality Index (“AQI”) is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

2. Evaluation of Handwashing Facilities

In order to protect employees, Bayhill High School evaluates its handwashing facilities in order to determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

Bayhill High School encourages employees to wash their hands with soap and water for at least 20 seconds each time.

Bayhill High School does not provide hand sanitizers with methyl alcohol.

3. Personal Protective Equipment (“PPE”)

a. Evaluation of the Need for PPE

Bayhill High School evaluates the need for PPE in order to prevent employees from being exposed to COVID-19 hazards.

b. Provision of PPE When Necessary

Bayhill High School provides PPE, including, but not limited to, face coverings, respirators, gloves, goggles, and face shields, to and for employees who require such equipment in order to perform their job duties in a healthy and safe manner, including where employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.



Upon request, Bayhill High School shall provide respirators to employees for voluntary use to all employees who are working indoors or in vehicles with more than one person. Whenever the School makes respirators available for voluntary use, the School will ensure that employees receive a respirator of the correct size and will provide such employees training on the proper use of such respirators, including, but not limited, the method by which employees may check the seal of such respirator in conformance with the manufacturer's instructions, as discussed in Section IV.E.6.

4. Testing of Symptomatic Employees

Bayhill High School makes COVID-19 testing available at no cost to employees with COVID-19 symptoms. This testing will be made available during the employees' paid time.

H. REPORTING, RECORDKEEPING AND ACCESS

1. Reporting COVID-19 Cases to the Local Health Department

Bayhill High School reports COVID-19 cases and COVID-19 outbreaks at Bayhill High School worksites and facilities to the local health department. Further, Bayhill High School provides any related information requested by the local health department.

2. Maintenance of Records Related to the Adoption of the CPP

Bayhill High School maintains records of the steps it has taken to implement this provisions described in this CPP.

3. Availability of the CPP for Inspection

Bayhill High School makes this written CPP available to employees and employee organizations at School worksites or facilities. Further, the School makes this written CPP available to Cal/OSHA representatives immediately upon request.

4. Records Related to COVID-19 Cases



Bayhill High School keeps a record of and tracks all COVID-19 cases with the following information: (1) employee's name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.

Bayhill High School keeps employees' medical information confidential.

## I. EXCLUSION OF COVID-19 CASES AND EXCLUSION OF EMPLOYEES WHO HAD A CLOSE CONTACT COVID-19 EXPOSURE

### 1. Exclusion of COVID-19 Cases from Bayhill High School Worksites and Facilities

Bayhill High School ensures that COVID-19 cases are excluded from Bayhill High School worksites and facilities until the employee satisfies the minimum return to work criteria, as provided in Section IV.J.

### 2. Exclusion of Employees with Close Contact COVID-19 Exposures from [School] Worksites and Facilities

Using CDPH guidance, Bayhill High School develops, implements, and maintains effective policies to prevent transmission of COVID-19 by persons who had close contact.

### 3. Provision of Benefits to Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis

#### a. Employees Who Are Able to Telework during Isolation or Quarantine Period

Bayhill High School allows employees who are able to telework 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.

The School continues and maintains such an employee's earnings, wages, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job.



b. Employees Who Are Unable to Telework during Isolation or Quarantine Period

The following employees are not entitled to the benefits described below: (1) Employees for whom Bayhill High School can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) Employees who received disability payments or were covered by workers' compensation and received temporary disability. Such employees may still use paid sick leave for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.

For other employees, Bayhill High School requires that employees who are unable to telework, but are otherwise able and available to work, the School may use paid sick leave available to the employee for the purpose of continuing and maintaining the employee's earnings during the isolation or quarantine period. Bayhill High School may use the employee's paid sick leave in order to continue and maintain the employee's earnings during the isolation or quarantine period.

Employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. Bayhill High School may provide such employees who are unable to telework, but who do not have any paid sick leave available, paid administrative leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, Bayhill High School will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable law, [School] policy, or collective bargaining agreement that provides employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees





At the time of exclusion, Bayhill High School provides the excluded employees the information on paid leave benefits to which the employees may be entitled under applicable federal, state, or local laws.

This includes, but is not limited to, any paid leave benefits available under workers' compensation law, Labor Code sections 3212.86 through 3212.88, [any applicable local governmental requirements], the [School]'s own leave policies, and leave guaranteed by contract.

## J. RETURN TO WORK CRITERIA

### 1. Minimum Criteria to Return to Work for COVID-19 Cases

Bayhill High School requires that a COVID-19 case isolate and remain at their home or place of residence and not return to any School worksite following their diagnosis as a COVID-19 case.

A COVID-19 case may discontinue isolation and return to Bayhill High School worksites after satisfying either of the following two (2) return to work protocols:

#### a. Asymptomatic COVID-19 Cases or COVID-19 Cases with Resolving Symptoms

COVID-19 cases, regardless of the employee's vaccination status or previous infection, who do not develop COVID-19 symptoms or whose COVID-19 symptoms are resolving (i.e., improving), shall not return to work until satisfying the following conditions:

- (1) At least five days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test;
- (2) At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever reducing medications; and
- (3) A negative COVID-19 test from a specimen collected on the fifth day or later is obtained; or, if unable to test or the employer chooses not to require a test, 10 days have passed from the date that COVID-19 symptoms began or, if the person does not develop COVID-19 symptoms, from the date of first positive COVID-19 test.



b. COVID-19 Cases with Symptoms That Are Not Resolving

COVID-19 cases, regardless of the employee's vaccination status or previous infection, whose COVID-19 symptoms are not resolving, shall not return to work until the employee satisfies the following criteria:

(1) At least 24 hours have passed since a fever of 100.4 degrees Fahrenheit or higher has resolved without the use of fever-reducing medication; and

(2) Symptoms are resolving or 10 days have passed from when the symptoms began.

c. Face Covering Requirements

Regardless of vaccination status, previous infection, or lack of COVID-19 symptoms, a COVID-19 case shall wear a face covering in the workplace 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.

2. Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official

If employees are subject to an isolation or quarantine order issued by a state or local health official, Bayhill High School requires that the employees not report to any Bayhill High School worksite until the period of isolation or quarantine is completed or the order is lifted.

If the relevant order did not specify a definite isolation or quarantine period, then the School will require that employees isolate or quarantine according to the applicable periods and criteria provided for in this Section or as otherwise instructed by Bayhill High School.

3. Allowance by Cal/OSHA for an Employee to Return to Work

If no violations of state or local health officer orders related to the employee's isolation, quarantine, or exclusion would result, Bayhill High School may request that Cal/OSHA waive the quarantine or isolation requirement for essential employees and allow such employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.



Where the absence of an essential employee from the School's worksite would cause a staffing shortage that would have an adverse on a community's health and safety and pose an undue risk to the community's health and safety as a result, Cal/OSHA may grant such waiver.

In order to request a waiver under such circumstances, the [School] will submit the written request to [rs@dir.ca.gov](mailto:rs@dir.ca.gov). In the event of an emergency, the [School] may request a provisional waiver by contacting the local Cal/OSHA office while the [School] prepares the written waiver request.

The written waiver request must provide for the following information:

1. Employer name and business or service;
2. Employer point-of-contact name, address, email and phone number;
3. Statement that there are no local or state health officer orders for isolation or quarantine of the excluded employees;
4. Statement describing the way(s) in which excluding the exposed or COVID-19 positive employees from the workplace impacts the employer's operation in a way that creates an undue risk to the community's health and safety;
5. Number of employees required to be quarantined under the Cal/OSHA regulation, and whether each was exposed to COVID-19 or tested positive for COVID-19; and
6. The employer's control measures to prevent transmission of COVID-19 in the workplace if the employee(s) return or continue to work in the workplace, including the prevention of further exposures. These measures may include, but are not limited to, preventative steps such as isolating the returned employee(s) at the workplace and requiring that other employees use respirators in the workplace.

In addition to submitting a request for a Cal/OSHA waiver, Bayhill High School will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at Bayhill High School worksite and, if isolation is not feasible, the use of respirators in the workplace.

