



BESANT HILL SCHOOL

Cal/OSHA COVID-19 Prevention Program

Besant Hill School of Happy Valley

2021-2022

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

Date: 8/1/2021

Authority and Responsibility

Alex Smith, CEO 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, being fully vaccinated, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

1. Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
2. Document the vaccination status of our employees by using **Appendix E: Documentation of Employee COVID-19 Vaccination Status**, which is maintained as a confidential medical record
3. Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
4. Develop COVID-19 policies and procedures to respond effectively and immediately to individuals at the workplace who are a COVID-19 case to prevent or reduce the risk of transmission in the workplace, such as:
 - a. Cleaning and Disinfecting:
 - i. Depending on where the COVID-19 case is on campus, will determine the cleaning and disinfecting requirements. For example, we would utilize the services of an outside company if the positive case is part of the kitchen staff since that area has strict cleaning and disinfecting requirements.
 - b. Employees that have had a close contact and/or are symptomatic are offered Covid-19 testing at no cost during their working hours.

- c. For any positive COVID-19 test result, an investigation and contact tracing will be started by members of the Health and Wellness Committee and reported to Ventura County Public Health using the appropriate methodology.
 - d. Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met, and they have received a return to work document from the Ventura County Health Department
 - e. Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions.
 - i. Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - ii. COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
 - f. **COVID-19 cases with COVID-19 symptoms** will not return to work until all the following have occurred:
 - i. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications, AND
 - ii. COVID-19 symptoms have improved, AND
 - iii. At least 10 days have passed since COVID-19 symptoms first appeared.
 - g. **COVID-19 cases who tested positive but never developed COVID-19 symptoms** will not return to work until a minimum of 10 days has passed since the date of specimen collection of their first positive COVID-19 test.
 - i. A negative COVID-19 test will not be required for an employee to return to work once the requirements for “cases with symptoms” or “cases who tested positive but never developed symptoms” (above) have been met.
 - h. Persons who had a close contact may return to work as follows:
 - i. Close contact but never developed symptoms: when 10 days have passed since the last known close contact
 - ii. Close contact with symptoms: when the “cases with symptoms” criteria (above) have been met, unless the following are true:
 - 1. The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms, and
 - 2. At least 10 days have passed since the last known close contact, and
 - 3. The person has been symptom-free for at least 24 hours, without using fever-reducing medications
 - i. 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.
5. 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.
 6. Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.

7. 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.
8. Collection of laboratory specimens for surveillance and response to incident SARS CoV-2 testing

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

1. Bringing their concerns to any member of the Besant Hill of Happy Valley Health and Wellness Committee.

Employee screening: we screen our employees and respond to those with COVID-19 symptoms by:

1. Instructing all staff members to self-screen each morning for the following symptoms:
 - a. Fever or chills
 - b. Cough
 - c. Shortness of breath or difficulty breathing
 - d. Fatigue
 - e. Muscle or body aches
 - f. Headache
 - g. New loss of taste or smell
 - h. Sore throat
 - i. Congestion or runny nose
 - j. Nausea or vomiting
 - k. Diarrhea
2. All employees have been instructed that if they are not feeling well they are to stay at home and notify Health Services Staff or their immediate supervisor, PRIOR to reporting for work

Correction of COVID-19 Hazards

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

1. The severity of the hazard will be assessed and a remedy, as well as the time frame for correcting the issue, will be determined.
2. Individuals are identified as being responsible for the corrective action plan.
3. Responsible individual(s) will notify the Reopening Committee when the corrective action is complete.

Control of COVID-19 Hazards

Face Coverings

Employees may use their own face masks (no bandanas or gaiters), or we will provide clean, undamaged face masks to anyone who requests them. We ensure they are properly worn by

employees over the nose and mouth when required, such as indoors when students are present. Employees have been informed that face masks must be in clean and undamaged condition.

Any employee who encounters an individual not wearing an appropriate face covering will immediately inform the individual that it is the policy that a face mask be worn at all times indoors when students are present, except when eating or drinking. If the individual does not have a face mask, a clean, undamaged face mask will be provided.

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

1. Since our employees are 100% vaccinated, they are not required to wear a face covering unless they are in the presence of a student and are indoors.
2. While eating and drinking at the workplace. If indoors, ventilation has been maximized to the extent possible.
3. 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, such as a face shield with a drape.

Engineering controls

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

1. Having air conditioning systems set to "Fan on" at all times
2. Allow windows to be open to bring in fresh air
3. Replacing ventilation filters with MERV-13 filters
4. Outside HVAC consultant brought in to assist in the review of HVAC systems
5. Systems maintained as per State of California requirements for schools

Cleaning and disinfecting

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

1. New shared responsibility by all staff at Besant Hill School. Reducing the risk of exposure to COVID-19 by cleaning and disinfection is an important part of our Covid 19 Protection Plan at Besant Hill School. Everyone has a role in making sure our community is as safe as possible.
2. The virus that causes COVID-19 can be killed if you use the right products. EPA has compiled a list of disinfectant products that can be used against COVID-19, including ready-to-use sprays, concentrates, and wipes. Each product has been shown to be effective against viruses that are harder to kill than viruses like the one that causes COVID-19.
3. Normal routine cleaning with soap and water will decrease how much of the virus is on surfaces and objects, which reduces the risk of exposure.
4. Disinfection using EPA - approved disinfectants can also help reduce the risk. Frequent disinfection of surfaces and objects touched by multiple people is important.
 - a. When EPA-approved disinfectants are not available, alternative disinfectants can be used safely and effectively.
 - b. PPE:
 - i. Gloves:

- ii. Wear disposable gloves when cleaning and disinfecting. Gloves are discarded after each use.
 - iii. Clean hands immediately after gloves are removed.
 - 1. Soap and Water are preferable, hand sanitizer otherwise.
 - iv. Eye Protection:
 - 1. When there is potential for splash or splatter in the face
5. Cleaning kit:
- a. This is a tote that is placed in each space (classrooms, main office) where cleaning is performed routinely during the day
 - i. 32oz bottle of disinfectant with a spray nozzle
 - ii. One roll of shop towels
 - iii. One box of gloves
 - iv. One Ziplock baggie of face masks (in case someone does not have one)
 - v. One Ziplock baggie of wipes specifically for electronic devices
 - b. The Maintenance Department is the keeper of supplies and is responsible for keeping the Cleaning Kit adequately stocked.
6. Cleaning/Disinfecting Procedures:
- a. Indoor areas, hard surfaces:
 - i. Faculty: as needed for obviously dirty surfaces
 - ii. Maintenance: at end of the day
 - 1. Clean obviously dirty surfaces using soap and water
 - 2. Disinfect high touch surfaces
 - 3. High touch surfaces include:
 - a. Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.
 - b. Disinfectant Procedures:
 - i. We are using Magic Wand disinfectant which is an EPA-registered household disinfectant, reconstituted and filled into 32oz. spray bottles
 - ii. Maintenance is responsible for keeping containers filled
 - iii. Follow the instructions on the label to ensure safe and effective use of the product
 - 1. Keeping the surface wet for approximately 10 minutes (see product label).
 - 2. Wearing gloves and good ventilation during the use of the product.
 - 3. Use no more than the amount recommended on the label.
 - 4. Use water at room temperature for dilution (unless stated otherwise on the label).
 - 5. Avoid mixing chemical products.
 - 6. Label diluted cleaning solutions.
 - 7. Store and use chemicals out of the reach of children.

8. You should never eat, drink, breathe or inject these products into your body or apply them directly to your skin as they can cause serious harm.
- iv. Alternative disinfectants:
 1. These products are only to be used in case of emergency or our inability to procure supplies.
 2. Diluted household bleach solutions may also be used if appropriate for the surface.
 - a. Check the label to see if your bleach is intended for disinfection and has a sodium hypochlorite concentration of 5%–6%.
 - b. Ensure the product is not past its expiration date.
 - c. Follow the manufacturer's instructions for application and proper ventilation.
 - d. Never mix household bleach with ammonia or any other cleanser.
 - e. Leave the solution on the surface for at least 1 minute.
 - f. To make a bleach solution, mix:
 - g. 5 tablespoons (1/3rd cup) bleach per gallon of room temperature water OR
 - h. 4 teaspoons bleach per quart of room temperature water
 - i. (iii) Bleach solutions will be effective for disinfection for up to 24 hours.
 3. Alcohol solutions with at least 70% alcohol may also be used.
 4. Vacuum as usual.
 - a. Use a vacuum equipped with a high-efficiency particulate air (HEPA) filter.
 - b. Do not vacuum in space that is occupied.
 - c. When students vacuum, they should wear a mask
 5. Electronics
 - a. For electronics, such as tablets, touch screens, keyboards, AND remote controls, clean/disinfect prior to use.
 - b. Follow the manufacturer's instructions for cleaning and disinfecting.
 - i. If no guidance, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly.
 6. Laundry:
 - a. Routine:
 - i. Provide disposable gloves, and hand sanitizer in each laundry space.

- ii. Signage:
 - 1. Guidance on proper laundry procedures
 - 2. For clothing, towels, linens, and other items
 - 3. Launder items according to the manufacturer's instructions. Use the warmest appropriate water setting and dry items completely.
- 7. Cleaning and disinfecting outdoor areas.
 - a. Outdoor areas generally require normal routine cleaning but do not require disinfection.
 - b. High touch surfaces made of plastic or metal, such as grab bars and railings, should be cleaned routinely.
 - c. Cleaning and disinfection of wooden surfaces or groundcovers are not recommended.
 - d. Sidewalks and roads should not be disinfected.
 - e. Alternative disinfection methods
 - i. The efficacy of alternative disinfection methods, such as ultrasonic waves, high-intensity UV radiation, and LED blue light against COVID-19 virus is not known.
 - ii. EPA does not routinely review the safety or efficacy of pesticidal devices, such as UV lights, LED lights, or ultrasonic devices. Therefore, EPA cannot confirm whether, or under what circumstances, such products might be effective against the spread of COVID-19.
 - iii. CDC does not recommend the use of sanitizing tunnels. There is no evidence that they are effective in reducing the spread of COVID-19. Chemicals used in sanitizing tunnels could cause skin, eye, or respiratory irritation or damage.
 - iv. CDC only recommends the use of the [surface disinfectants identified on List N](#) against the virus that causes COVID-19.

7. Cleaning and Disinfecting Schedules

- a. Schedule: Reopening
 - i. If the space has been cleaned, and unoccupied for 7 days or more, it will only need normal routine cleaning to reopen the area.
 - 1. Maintenance responsibility
- b. Schedule: Routine/Daily
 - i. Faculty/Staff:
 - 1. Clean frequently touched surfaces using EPA-registered disinfectants as needed for obviously dirty surfaces.
 - ii. Maintenance:
 - 1. Clean obviously dirty surfaces. Disinfect all high-touch surfaces using EPA-registered disinfectant as needed.
 - 2. Bathrooms: cleaned daily
 - 3. Continue regular Maintenance cleaning schedules.

- iii. Kitchen Staff:
 - 1. Continue existing practices for Cleaning, Disinfecting, and Sanitizing.
- 8. Signage:
 - a. Signage supporting the cleaning and disinfecting policies will be distributed across campus.

Should we have a COVID-19 case in our workplace, we will implement the following procedures:

- 1. Cleaning and Disinfecting:
 - a. Depending on where the COVID-19 case is on campus, will determine the cleaning and disinfecting requirements. For example, we would utilize the services of an outside company if the positive case is part of the kitchen staff since that area has strict cleaning and disinfecting requirements.
 - b. Products used for routine cleaning are to be used with a COVID-19 positive case.
 - i. Initial training provided to Maintenance staff. If the need arises, prior to beginning the cleaning/disinfecting process for a COVID-19 case, Health Services staff will meet with the Maintenance team to review processes and procedures.
 - c. Someone is sick (non-quarantine/isolation location)
 - i. Close off areas used by the person who is sick.
 - ii. Open outside doors and windows to increase air circulation in the area.
 - iii. Wait 24 hours before you clean or disinfect. If 24 hours is not feasible, wait as long as possible.
 - iv. Once an area has been appropriately disinfected, it can be opened for use.
 - 1. Persons without close contact with the person who is sick can return to work immediately after disinfection.
 - v. If more than 7 days since the person who is sick visited or used the facility, additional cleaning and disinfection is not necessary
 - 1. Continue routine cleaning and disinfection.
 - 2. Vacuum the space if needed.
 - 3. Use a vacuum equipped with a high-efficiency particulate air (HEPA) filter.
 - 4. Do not vacuum a room or space that has people in it. Wait until the room or space is empty to vacuum, such as at night, for common spaces, or during the day for private rooms.
 - d. Quarantine and Isolation Areas
 - i. The person who is in quarantine/isolation will stay separated from other people and be responsible for cleaning their space.
 - 1. Separate bedroom and bathroom
 - a. Clean the area around the person who is sick when needed.
 - 2. Shared bathroom
 - a. Clean and disinfect after each use, done by the sick individuals.
 - ii. Once quarantine/isolation is vacated, wait 24 hours (if possible) and then clean/disinfect the entire space.

1. Maintenance responsibility:
 - a. Cleaning will be done wearing disposable coveralls, gloves, and a mask
 - b. Follow Cleaning/Disinfecting guidelines outlined for Cleaning and Disinfecting hard and soft surfaces, electronics, and laundry.
2. Laundry
 - a. Sick Individual:
 - i. Wear disposable gloves when handling dirty laundry from a person who is sick.
 - ii. Dirty laundry from a person who is sick can be washed with other people's items
 1. Do not shake dirty laundry
 2. Clean and disinfect clothes hampers
 3. Remove gloves, wash hands immediately.

Shared tools, equipment, and personal protective equipment (PPE)

1. Personal Protective Equipment (gloves, goggles, masks, face shields) must not be shared.
2. Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. Recommended to not share to the extent feasible. Where there must be sharing, the items will be disinfected between uses by using the products supplied in the cleaning kit for each work area.
3. Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seat belt buckles, armrests, shifter, etc.) will be disinfected between users using the cleaning supplies in the cleaning kit in the workspace.

Hand sanitizing

Implementation of effective hand sanitizing procedures:

1. Community-wide promotion and enforcement for washing hands, avoiding contact with one's eyes, nose, and mouth, and covering coughs and sneezes. Proper Handwashing technique discussed and demonstrated. In-person education has occurred which has been reinforced with written and recorded materials. Continuing in-person education with all new hires during orientation by Health Services staff.
2. Touchless soap dispensers in all bathrooms.
3. Increased the number of hand sanitizer stations throughout campus. Outside of every classroom, dining commons, dorms, theatre, and main office. Only using hand sanitizer that is at least 60% ethyl alcohol, no methyl alcohol based hand sanitizers.

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

1. 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.

2. 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.
3. We provide and ensure the 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.
4. **Testing of symptomatic employees:**
 - a. We make COVID-19 testing available at no cost to employees with COVID-19 symptoms during employees' paid time

Investigating and Responding to COVID-19 Cases

We have developed effective procedures to investigate COVID-19 cases that include seeking information from our employees regarding COVID-19 cases, close contacts, test results and onset of symptoms. This is accomplished by using our internal Besant Hill COVID-19 investigation tool (see Appendix C)

We also ensure the following is implemented:

1. Employees that have had a close contact and/or are symptomatic are offered Covid-19 testing at no cost during their working hours.
2. For any positive COVID-19 test result, an investigation and contact tracing will be started by members of the Health and Wellness Committee and reported to Ventura County Public Health using the appropriate methodology.

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:

1. The current system for communicating with employees may take one of several forms, depending upon the severity of the situation and the requirements for keeping information confidential.:
 - a. Face to face communication
 - b. Telephone call or text messaging
 - c. Email - either individual or group
 - d. Group face-to-face communication either in person or by web conference
2. Employees will report COVID-19 symptoms or potential close contacts to their immediate supervisor. If the immediate supervisor is not available, they may report to the Health Services Office or Administration
 - a. Testing of these individuals may be done on campus, by a personal physician or at a Ventura County Health Department testing site location
 - b. Information about these options will be given to the employee. If they are not on campus, it is best to have the employee go to an outside location so as to not expose any members of the Besant Hill community.
 - c. Employees will be informed by the Health Services Office about the ramifications of symptoms, or close contact with a positive individual, including potential quarantine and isolation.
3. Employees should report any COVID -19 potential hazards to their immediate supervisor or any member of the Besant Hill Reopening Committee.

4. Communicating COVID-19 symptoms, contact, or potential hazards will always be without reprisal to the employee.
5. Any employee with a medical or other condition that puts them at increased risk of severe COVID-19 will report this to the Administration without fear of reprisal. When possible, given the type of job the employee performs, accommodations will be made.
6. The Besant Hill Covid-19 Safety Plan is available to all employees by request or on the Besant Hill School website.

In the event we 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.

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 provided to the exposed employees

Training and Instruction

We have provided effective training and instruction that includes:

1. Written, recorded, and in-person training
2. What SARS-CoV2 and Covid-019 is, how the virus is transmitted (including asymptomatic spread), mitigation strategies, the school protection plan, use of PPE, hand Hygiene, use of face masks, cleaning/disinfecting responsibilities, procedures, and schedules
 - a. Topics:
 - i. COVID-19 is an infectious disease that can be spread through the air
 - ii. COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose or mouth
 - iii. An infectious person may have no symptoms
 - iv. COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
 - v. Particles containing the virus can travel more than 6 feet, especially indoors, so physical distancing, face coverings, increased ventilation indoors and respiratory protection decrease the spread of COVID-19 and are most effective when used in combination.
 - vi. 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 hands are soiled.
 - vii. Proper use of face coverings and the fact that face coverings are NOT respiratory protective equipment. Since COVID-19 is an airborne disease, N95s and more protective respirators protect the users from airborne disease, while face coverings primarily protect people around the user.
 1. See the Face Coverings section for a discussion regarding when face coverings are required

2. Employees can request face coverings and can wear them at work regardless of vaccination status and without fear of retaliation
- viii. Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
3. Encouraged staff to come forward regarding concerns they have regarding engaging in the school community. If an employee comes forward, information on employer and government-sponsored leave benefits staff may be entitled to will be made available and discussed.
4. Any community member who has symptoms of COVID-19 has been educated NOT to come to work. Any community member who is not feeling well must contact their immediate supervisor, the Health Office, or Administrator on Duty.

Appendix D: Covid Training Roster will be used to document this training

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

1. Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met and they have received a return to work document from the Ventura County Health Department
2. Excluding employees that had a close contact from the workplace until our return-to-work criteria have been met, with the following exceptions.
 - a. Employees who were fully vaccinated before the close contact and who do not develop COVID-19 symptoms.
 - b. COVID-19 cases who returned to work per our return-to-work criteria and have remained free of COVID-19 symptoms, for 90 days after the initial onset of COVID-19 symptoms, or for COVID-19 cases who never developed COVID-19 symptoms, for 90 days after the first positive test.
3. Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that there is a COVID-19 exposure whether work-related or not. This will be accomplished by paying employees their normally scheduled wages, currently exceeding the provisions of the FFCRA.
4. Providing employees at the time of exclusion with information on available benefits. All employee notices have been clearly communicated and we have posted these provisions in writing in three locations on campus, the main office, kitchen, and maintenance office. These employee rights are posted in both English and Spanish.
5. Providing employees at the time of exclusion with information on available benefits

Reporting, Recordkeeping, and Access

It is our policy to:

1. 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.
2. 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.
3. Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
4. Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
5. Use State of California's SPOT tool to record and keep track of all COVID-19 cases as required.
 - a. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.
6. Using an internal tracking tool for all issues surrounding Covid -- staff who call in sick and what transpired, community contact that has not impacted school, etc.

Return-to-Work Criteria

1. **COVID-19 cases with COVID-19 symptoms** will not return to work until all the following have occurred:
 - a. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications, AND
 - b. COVID-19 symptoms have improved, AND
 - c. At least 10 days have passed since COVID-19 symptoms first appeared.
2. **COVID-19 cases who tested positive but never developed COVID-19 symptoms** will not return to work until a minimum of 10 days has passed since the date of specimen collection of their first positive COVID-19 test.
 - a. A negative COVID-19 test will not be required for an employee to return to work once the requirements for "cases with symptoms" or "cases who tested positive but never developed symptoms" (above) have been met.
3. Persons who had a close contact may return to work as follows:
 - a. Close contact but never developed symptoms: when 10 days have passed since the last known close contact
 - b. Close contact with symptoms: when the "cases with symptoms" criteria (above) have been met, unless the following are true:
 - i. The person tested negative for COVID-19 using a polymerase chain reaction (PCR) COVID-19 test with specimen taken after the onset of symptoms, and
 - ii. At least 10 days have passed since the last known close contact, and

- iii. The person has been symptom-free for at least 24 hours, without using fever-reducing medications
- 4. 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.

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example meetings, entrances, bathrooms, hallways, aisles, walkways, dining commons, common areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, visitors, members of the public, students, and families. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person(s) conducting the initial evaluation:

2021-2022 Besant Hill Health and Wellness Committee Members

Date:

June - August 2021

Name(s) of employee and authorized employee representative that participated:

Alex Smith, Portia Johnson, Megan Walton, Cindy Gagnon, Claire Lowndes, Juana Juarez

| Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards | Places and times | Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers | Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation |
|--|-------------------------|---|--|
| Dormitory Common Space | All days, varying times | Intermittent potential for interaction | <ul style="list-style-type: none"> ● PPE readily available ● MERV-13 filters installed in Dormitory HV/AC system |
| Dining Spaces (Cafeteria & Outdoor dining tables) | All days, varying times | Intermittent potential for interaction | <ul style="list-style-type: none"> ● Masks required at all times other than while eating ● Temperature check with hands free device taken at the entrance for each breakfast meal ● Hand sanitization prior to each meal ● Tables disinfected after each use |
| Student Affairs Offices | All days, varying time | Intermittent potential for interaction | <ul style="list-style-type: none"> ● Face covering when students present ● Hand sanitizer readily available |
| Classrooms | All days, varying time | Intermittent potential for interaction | <ul style="list-style-type: none"> ● PPE required and readily available ● Cleaning tote in each classroom ● Cleaning at the end of each day |

| | | | |
|-------------|--------------------------------------|--|---|
| | | | <ul style="list-style-type: none"> • Disinfecting on an as needed basis |
| Theater | All days, varying time | Intermittent potential for interaction | <ul style="list-style-type: none"> • PPE required and readily available • MERV-13 filters installed in theater HV/AC system • Disinfectant solution, gloves, disposable masks and paper towels are available to be used as needed between activities |
| Weight Room | All days, varying time | Intermittent potential for interaction | <ul style="list-style-type: none"> • Masks required • Hand sanitizing station prior to entering and upon exiting • Disinfectant solution, gloves, disposable masks and paper towels are available |
| Signage | Varying locations, permanent posting | N/A | <ul style="list-style-type: none"> • We identified the need for educational signage to support hygiene practices including hand washing procedure, and hand sanitization |

Appendix B: COVID-19 Inspections

Date: Summer 2021

Name of person conducting the inspection:

- Alex Smith
- Portia Johnson
- Megan Walton
- Claire Lowndes
- Sarah Stevens
- Jesse Johnson
- Wade Lyle

Work location evaluated: Entire Physical Campus

| Exposure Controls | Status | Person Assigned to Correct | Date Corrected |
|--|---|-----------------------------|----------------|
| Engineering | | | |
| Ventilation (amount of fresh air and filtration maximized) | Filters replaced with MERV-13 filters. | Jesse Johnson and Wade Lyle | Summer 2021 |
| Transportation | | | |
| Barriers/Partitions | Partitions remain in two vans that may be used to transport students to appointments, or the airport in order to protect the driver from aerosols | Cindy Gagnon | Summer 2021 |

| | | | |
|---|---|------------------------|------------------------|
| Vehicle Usage | All occupants of a multi-person vehicle must wear masks. | Megan Walton | Summer 2021 |
| Administrative | | | |
| Surface cleaning and disinfection (frequently enough and adequate supplies) | All classrooms, Main Office, Student Affairs, Theatre are equipped with cleaning kits for cleaning and disinfecting at the end of each day. . Maintenance staff continues routine cleaning schedule | Cindy Gagnon | Summer 2021 |
| Handwashing facilities | Updated to non-touch dispensers in most shared spaces | Maintenance Department | Summer 2021 |
| Disinfecting and hand sanitizing solutions | Added hand sanitizer stations throughout campus, outside of each classroom, each office building, outside each dorm, inside and outside of dining commons | Maintenance Department | Summer 2021 |
| Mandatory Covid-19 and Highly Encouraged Influenza vaccine | All staff and students in order to decrease the incidence of Influenza on campus | Administration | Fall 2020 and on-going |

| | | | |
|--------------------------------------|--|----------------|-------------|
| Personal Protective Equipment | | | |
| Face coverings | <p>Employees may wear their own face masks which must be cleaned often and in good condition, or the school will provide them for free. Only well-fitting, face masks may be worn, no gaiters or bandanas. Face masks are to be worn indoors when in the presence of students. .</p> | Administration | Summer 2021 |
| Gloves | <p>Gloves are to be worn whenever there is a chance of having hands come in contact with bodily fluids or disinfectants where the label states gloves are to be used</p> | Administration | Summer 2021 |
| Face shields/goggles | <p>(1)Face Shields are available for staff requesting them. However, they are to be worn in addition to face masks. If an employee cannot use a face mask secondary to a medical condition,</p> | Administration | Summer 2021 |

| | | | |
|-------------------------------------|---|----------------|--------------|
| | <p>Face Shields with a drape must be used</p> <p>(2)Face Shields are to be worn when performing test collection Goggles are to be used when handling disinfectants where the manufacturers label states goggles must be worn</p> | | |
| Respiratory protection | <p>(1)N95 masks are available for staff performing test collection activities or when in circumstances where 6 foot physical distancing cannot be observed for more than 15 minutes.</p> <p>(2)Employees with Health Conditions requiring N95 masks will be provided the masks at no cost to the employee</p> | Administration | Summer 20201 |
| Gowns, Coveralls and Foot Coverings | <p>(1)Gowns must be worn by staff collecting test specimens or when caring for a COVID-19 positive individual</p> <p>(2)Coveralls and foot coverings to be used by staff when deep</p> | Administration | Summer 2021 |

| | | | |
|--|---|--|--|
| | cleaning and disinfecting in a space where a confirmed case was residing | | |
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Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

As of January 14, 2021, we are required to do case investigation in the SPOT tool created by the State of California to assist with contract tracing and case investigation activities.

Besant Hill School has created our own Covid case investigation tool. Covid Investigation forms are located in the Besant Hill Health Office:

Appendix D: COVID-19 Training:

A mandatory All Staff meeting was held on 8/19/2021. Covid-19 training was provided using this slide presentation ([August 19 Covid training](#)). The sign in sheet for the All - Staff training is found at the end of the CPP Appendices.

Cal/OSHA COVID-19 Prevention Program

Besant Hill School of Happy Valley

Additional Consideration #1: Multiple COVID-19 Infections

This section of CPP will be added to Besant Hill School CPP if our school is identified by Ventura County Health Department as the location of a COVID-19 outbreak or if there are 3 or more COVID-19 cases in the school within a 14-day period. This plan will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

1. 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.
2. COVID-19 testing consists of the following:
 - a. 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.
 - b. 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.
 - c. We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

1. 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

1. 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

1. 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:

- a. Investigation of new or unabated COVID-19 hazards including:
- b. Our leave policies and practices and whether employees are discouraged from remaining home when sick.
- c. Our COVID-19 testing policies.
- d. Insufficient outdoor air.
- e. Insufficient air filtration.
- f. Lack of physical distancing.

Updating the review:

- a. Every thirty days that the outbreak continues.
- b. In response to new information or to new or previously unrecognized COVID-19 hazards.
- c. When otherwise necessary.

Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:

1. Moving indoor tasks outdoors or having them performed remotely.
2. Increasing outdoor air supply when work is done indoors.
3. Improving air filtration.
4. Increasing physical distancing as much as possible.
5. Respiratory protection.

Notifications to the local health department

1. 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.
2. 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.

Cal/OSHA COVID-19 Prevention Program

Besant Hill School of Happy Valley

Additional Consideration #2:

Major COVID-19 Outbreaks

This section of CPP will be added to the Besant Hill School CPP if we experience 20 or more COVID-19 cases within a 30 day period. This will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

1. We will provide twice a week COVID-19 testing, or more frequently if recommended by the Ventura County 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

1. 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

1. We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

1. In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:
2. 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.
3. 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.
4. We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected.
5. 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**.

Additional Consideration #3 COVID-19 Prevention in Employer-Provided Housing

This section is not applicable to Besant Hill School of Happy Valley

Additional Consideration #4 COVID-19 Prevention in Employer-Provided Transportation

This section is not applicable to Besant Hill School of Happy Valley