

COVID-19 PREVENTION PROGRAM (CPP) FOR STEM Prep Schools

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

Date: last updated on **August 19, 2021**

AUTHORITY AND RESPONSIBILITY

Eric Barlow, Chief Operating Officer, has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

EMPLOYEE PARTICIPATION

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

- Notifying their principal, direct manager, or COO right away about any concerns or emailing covid19@stem-prep.org

EMPLOYEE SCREENING

We screen our employees by:

- STEM Prep [COVID-19 Screening Procedures](#)

CORRECTION OF COVID-19 HAZARDS

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

- The School Operations Manager or HR Manager will conduct monthly 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.

- Hazards will be communicated to Eric Barlow and addressed as soon as possible. The School Operations Manager or COO will address physical infrastructure hazards; if the hazard is related to an employee's noncompliance with procedures, the COO and Human Resources Manager will address the hazard with the employee directly.
- Once a hazard is corrected, that information should be communicated to the COO.

CONTROL OF COVID-19 HAZARDS

PHYSICAL DISTANCING

To the extent possible, we will encourage physical distancing in our workplace by:

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements when possible.
- Reducing the number of persons in an area at one time to the extent possible, including visitors.
- Spacing tables and chairs apart from one another to the extent possible, including in classrooms, offices, and meal service areas.
- Using outdoor spaces to the extent possible.

Particular care will be taken to physically distance when masks are off, such as when eating or drinking.

FACE COVERINGS

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

- Anyone entering school property who has contact with others (students, parents or other employees) is required to wear a cloth face covering.
 - Employees are provided, at no cost, a cloth face covering. The covering is to be worn by the employee at all times while on-site when in contact or likely to come into contact with others. Employees need not wear a cloth face covering when alone in a private office.
 - A medical grade mask is provided to any employee who cares for sick children or who has close contact with any child with a medical condition that precludes the child's use of a cloth face covering.
 - Employees must wash their face coverings daily. Parents are instructed to ensure that children have clean face coverings.
- Schools will provide one reusable cloth face covering to each staff member and student.
- Any individual who arrives without a mask will be provided a disposable mask.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Students or staff members who are unable to wear a cloth face covering according to written doctors' orders may wear a face shield with a tucked in drape underneath. People with documented conditions that do not accommodate the face shield and drape may request a reasonable accommodation from the school. All such determinations must be approved by a physician, nurse practitioner, or other licensed medical professional practicing under the license of a physician.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is

tested at least twice weekly for COVID-19.

ENGINEERING CONTROLS

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

- Replacing all existing filters with MERV-13 filters per EPA recommendations.
- Setting all thermostats to fan in “ON” position (not “AUTO”) to increase air flow.
- As temperatures and conditions allow, keeping windows open in classrooms to increase air flow. Students and staff should wear extra layers to allow this to happen.
- Classroom doors should stay open during instruction to increase airflow throughout building.
- To the extent possible and where it doesn’t cause safety concerns, main doors to buildings should remain open.

CLEANING AND DISINFECTING

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

- Generally, rooms and surfaces will be cleaned and disinfected daily.
- Schools will maintain sufficient supplies of the following:
 - Disposable masks - Waxie #799351
 - Reusable Face Shields - Waxie #88SUNHGASSY16
 - Vinyl Gloves (Waxie)
 - M - 791249
 - L - 791251
 - XL - 791252
 - Hand Sanitizer Dispensers - Waxie #38460400
 - Cleaning and Disinfecting Chemicals
 - Solsta 764 Lemon Quat Disinfectant - Waxie #170700
 - Solsta 120 XHD Degreaser - Waxie #410099
 - Solsta 443 Citrus Hydroxyclean - Waxie #410061
 - Solsta 320 Disinfectant - Waxie #170200

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

- If possible, close room for 24 hours with no access. If not possible, wait as long as is realistic.
- After 24 hours, the custodial team will clean/disinfect.
- The room will sit empty for 24 hours after cleaning.

SHARED TOOLS, EQUIPMENT AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by the teacher or an instructional assistant. They will be trained and provided the proper supplies.

HAND SANITIZING

In order to implement effective hand sanitizing procedures:

- At a minimum, students and adults should wash hands at the beginning and end of the day, before every meal, after outdoor play, and after cough/sneeze (in addition to bathroom visits). Students and adults are encouraged to wash their hands for at least 20 seconds each time.
- Students and staff should use hand sanitizer approximately once an hour. Schools should ensure one (preferably

wall-mounted) hand sanitizer dispenser is maintained and filled in every room that is in use. Hand sanitizers that contain methanol (methyl alcohol) will not be used.

- We have placed posters in hallways and bathrooms reminding students and staff to cleanse hands throughout the school day.

PERSONAL PROTECTIVE EQUIPMENT (PPE) USED TO CONTROL EMPLOYEES' EXPOSURE TO COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

COVID TESTING

COVID-19 testing of all employees and students is conducted on a regular basis in accordance with California Department of Public Health recommendations and, for the site operating on a co-located campus, the requirements of the Los Angeles Unified School District.

STEM Prep sites are utilizing a PCR test that is lab-based through the testing provider Innovative Health Diagnostic Medical lab (IHDlabs), which is a CLIA-certified lab. Test kits have been procured from labs that are able to provide most test results within 24-36 hours. The samples collected are scanned, packaged and sent to the lab. Test results and demographic data collected during the testing process are shared with public health authorities in accordance with the law. All test results and data collected is stored in a secure database and kept private. Testing is provided to all at no charge to anyone receiving a test.

If an employee or student becomes symptomatic or tests positive, the employee or student and household members who may have been exposed are given instructions to quarantine by the COVID-19 Compliance team and are referred for testing.

In the 14 days prior to reopening on an LAUSD campus, all STEM Prep students and staff who will be returning to the campus will be required to provide a negative COVID baseline test results.

Students and staff who return to school campuses will participate in symptomatic and response testing offered on the school campus. The cadence of testing will align with the cadence recommended by the California Department of Public Health and, for the co-located campus, the requirements of the Los Angeles Unified School District (currently, weekly testing of all individuals is required).

Staff and students may be asked to test based on Community Engagement requirements.

INVESTIGATING AND RESPONDING TO COVID-19 CASES

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

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

- Notified of their potential exposure over the phone and notified in writing of the benefits available to them within 24 hours
- Offered COVID-19 testing at no cost during their working hours

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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how - Employees can communicate symptoms and possible hazards to their School Operations Manager, Principal, COO, or Human Resources Manager
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- 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.

TRAINING AND INSTRUCTION

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing to the extent possible and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Appendix D: COVID-19 Training Roster will be used to document this training.

EXCLUSION OF COVID-19 CASES

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

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 10 days after the last known COVID-19 exposure to a COVID-19 case, unless the employee has provided proof of being fully vaccinated against COVID-19.
- Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. Per STEM Prep's policy, eligible employees may use COVID-Paid Sick Leave to take paid time off if an employee is unable to work (or telework)

due to any of the six qualifying reasons set forth below:

- 1. The employee is subject to a Federal, State, or local quarantine or isolation order related to COVID–19.
- 2. The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID–19. This includes situations in which the employee has been advised to self-quarantine because the employee has COVID-19, it is believed the employee may have COVID-19 due to known exposure or symptoms or the employee is deemed particularly vulnerable to COVID-19.
- 3. The employee is experiencing symptoms of COVID–19 and seeking a medical diagnosis.
- 4. The employee is caring for an individual who is subject to an order as described in subparagraph (1) or has been advised as described in subparagraph (2).
- 5. The employee is caring for a son or daughter of such an employee if the school or place of care of the son or daughter has been closed, or the child care provider of such son or daughter is unavailable, due to COVID–19 precautions. This may be taken if no other suitable person is available to care for the child during the period of the leave.
- 6. The employee is experiencing any other substantially similar condition specified by the Secretary of Health and Human Services in consultation with the Secretary of the Treasury and the Secretary of Labor.
- Providing employees at the time of exclusion with information on available benefits.

REPORTING, RECORDKEEPING, AND ACCESS

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Report immediately to the co-located school principal all cases on the co-located campus.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

RETURN-TO-WORK CRITERIA

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 10 days from the time the order to quarantine was effective.
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Eric Barlow, Chief Operating Officer

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, elevators, break or eating areas, cool-down 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, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: Eric Barlow

Date: August 2021

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

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
Main entrance	Arrival	Screening	Screening processes faithfully implemented for all students, staff, and visitors
School Main Offices	Throughout the day	Cleanliness	Minimize touching shared objects to the extent possible and disinfect objects touched by visitors between uses (i.e. pens)
School Main Offices	Throughout the day	Ventilation	Thermostats set to fan in "ON" position (not "AUTO") to increase air flow Doors and windows open to the extent possible
School Main Offices	Throughout the day	Proximity to other people	Desks spaced so that individuals are spaced as far apart as possible
School Hallways and Stairwells	Throughout the day	Proximity to other people	Staff members monitor hallway traffic and promote social distancing to the extent possible
Classrooms	Throughout the day	Shared supplies	No-touch systems for turning in work (i.e. Google Classroom) to the extent possible

Classrooms	Throughout the day	Proximity to other people	Desks spaced so that individuals are spaced as far apart as possible
Classrooms	Throughout the day	Ventilation	Thermostats set to fan in "ON" position (not "AUTO") to increase air flow Doors and windows open to the extent possible
School Bathrooms	Throughout the day	Cleanliness	Bathrooms cleaned and disinfected at least daily
School Offices, Kitchens, Teacher Work Rooms	Throughout the day	Shared supplies	Shared machines wiped down with disinfectant wipes if available
School Offices, Kitchens, Teacher Work Rooms	Throughout the day	Proximity to other people	Staff maintain 3 feet distance, to the extent possible, from one another in offices/kitchens/teacher work rooms
Water Fountains	Throughout the day	Cleanliness	Water fountains cleaned and disinfected at least daily
STEM Prep Home Office	Throughout the day	Cleanliness	Minimize touching shared objects to the extent possible and disinfect objects touched by visitors between uses (i.e. pens)
STEM Prep Home Office	Throughout the day	Ventilation	Thermostats set to fan in "ON" position (not "AUTO") to increase air flow Doors and windows open to the extent possible
STEM Prep Home Office	Throughout the day	Proximity to other people	Desks spaced so that individuals are spaced as far apart as possible

APPENDIX B: COVID-19 INSPECTIONS

See [Appendix B: COVID-19 Inspections Template](#)

APPENDIX C: INVESTIGATING COVID-19 CASES

See [Appendix C: Investigating COVID-19 Cases Template](#)

APPENDIX D: COVID-19 TRAINING ROSTER

Training will be provided through the SafeSchools online platform. Completion records can be downloaded from the platform as necessary.

ADDITIONAL CONSIDERATION #1: MULTIPLE COVID-19 INFECTIONS AND COVID-19 OUTBREAKS

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 TESTING

- We will provide COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

EXCLUSION OF COVID-19 CASES

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

INVESTIGATION OF WORKPLACE COVID-19 ILLNESS

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 INVESTIGATION, REVIEW AND HAZARD CORRECTION

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- [describe other applicable controls].

NOTIFICATIONS TO THE LOCAL HEALTH DEPARTMENT

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

ADDITIONAL CONSIDERATION #2: MAJOR COVID-19 OUTBREAKS

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 TESTING

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

EXCLUSION OF COVID-19 CASES

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria**, and any relevant local health department orders.

INVESTIGATION OF WORKPLACE COVID-19 ILLNESSES

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

COVID-19 HAZARD CORRECTION

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

NOTIFICATIONS TO THE LOCAL HEALTH DEPARTMENT

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.