COVID-19 Prevention Program (CPP) for Para Los Niños

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

Authority and Responsibility

Gabriela Herrera, Covid-19 Compliance Officer 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:

- 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: Emailing the COVID-19 Task Force with suggestions on how to improve a process and/or reporting flaws in an already implemented process.

Employee screening

We screen our employees with a self-passive screening application, in accordance with CDPH guidelines.

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: In the event that there are any hazards identified and reported, the Operations Department will assess the severity and set a timeline for the repairs. Notifications to all those at the site will be sent in the event of temporary closures to the site in order to make repairs and or deep sanitizations.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we encourage physical distancing in our workplace by:

• Maintaining at least 3 feet distance from each other at all times;
• Employing measures to ease foot traffic during peak hours;
• Occupying workspaces that are at least 3 feet apart. Wherever possible, workstations and other furniture are arranged to best support physical distancing;
• Minimizing use of shared office supplies, tools, and equipment; and disinfecting all supplies frequently and in between use;
• Implementing and utilizing contactless doors and trash cans wherever possible;
• Being mindful of “traffic jams” and “high-risk areas” where visitors, clients, and staff tend to stand together, such as hallways, stairs, elevators, and break areas- remember to maintain social distance. Visitors and staff may need to stand back and wait for the area to clear;
  o Whenever possible program employees will be asked to be present in hallways as clients enter, exit, and other times throughout the day as needed to assure physical distancing;
• Following guidelines for one-directional hallways and stairwells when applicable to minimize traffic;
• If small groups (within the guidelines) need to meet, do so in an area with adequate space to maintain social distancing and open air if possible;
• Reminding visitors, clients and co-workers of this policy where necessary;

If you observe any violations of this policy, contact the Site/Program Director or Deanette Brewer in Human Resources immediately.

If you have any questions about any aspect of this policy, please contact Deanette Brewer immediately at 213.250.4800 ext. 508
Face Coverings

Since February 2022 and through the rest of the 2022 year, both the California State Department of Public Health and the Los Angeles Department of Public health have adjusted their guidance on indoor and outdoor masking requirements. Similarly, many school districts and charter schools have aligned with those requirements to eliminate the requirement for indoor masking. These changes were implemented as a result of the data collected on positive cases throughout the County of Los Angeles and the State.

Since the start of the 22-23 school year, the COVID-19 Taskforce has paid close attention to our own internal COVID positivity case data and moved to implement an outdoor masking optional protocol at our charter schools in October 2022. It is with that additional data point in mind, the downward trend of positive cases throughout the County, and to align with the guidance from federal and state public health authorities that Para Los Niños (PLN) will now remove the requirement of indoor and outdoor masking. Masking at PLN will now be optional, with some restrictions remaining in place for specific staff to continue following guidelines that are unchanged at the County and State level.

Effective February 27, 2023, **ALL** staff, students, clients, families, and visitors will NOT be required to wear a mask while indoors or outdoors. If you would still like to wear your mask we encourage you to do so.

Mitigation practices and guidelines set in place to better protect our staff, students, clients and families from COVID-19 will remain in place; such as staying home if you are feeling ill or someone at home is experiencing COVID-like symptoms; practicing frequent and proper hand washing. Despite making masks optional, we encourage you to use a mask when feeling ill, masks helped PLN stay healthy not only from COVID-19, but from all other viruses. Screening prior to entering any PLN building will remain in place and will be enforced.

**Face Covering Guidelines for the Unvaccinated and Quarantined Individuals**

If you have been granted a vaccine exemption by Human Resources, you are still required to wear a mask indoors and outdoors. Masks will continue to be provided to you upon request. Any staff or student that is placed on quarantine and/or on-site quarantine or has been placed in isolation will continue to follow the guidelines and requirements of the PLN Exposure Management Plan by wearing a mask as outlined in the plan. Please be advised that failure to follow PLN’s face covering policy if you are unvaccinated or on quarantine may result in disciplinary action.

Please note that the COVID-19 Task Force reserves the right to re-instate indoor and outdoor masking without prior notice if it is due to an outbreak or there is a high positivity rate in the community transmission data. Furthermore, any state or local mandate by CADPH or LADPH will also be followed by PLN.
Should we have a positive COVID-19 case in our workplace, we will implement the following procedures:

- Remain calm and objective;
- Isolate the potentially infected client from other individuals while information is being gathered and family is being contacted for pick-up (for students);
- Immediately notify the Program Director/Program Supervisor;
- Program Director/Program Supervisor should then immediately contact the COVID-19 Compliance Task Force;
- Program Director/Program Supervisor and HR will conduct an assessment as follows:
  - Focus on obtaining facts and making factual statements;
  - Gather and document as much information as possible regarding the students/staff/visitors that may have been exposed for contact tracing purposes.
- If a client/staff/visitor is confirmed to have COVID-19, PLN will inform all who may have come in close contact with the individual of their possible exposure to COVID-19 at the site. Confidentiality when sharing this information will always be upheld and no more facts than necessary will be shared;
- If you would like to be tested to confirm your possible exposure, you can make an appointment with your doctor or local testing center.
- For any suspected or confirmed COVID-19 infections, we will follow CDC and local public health guidance regarding cleaning and disinfection recommendations. [https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/](https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/);
- For confirmed cases of COVID-19, PLN will report it to CDPH, DPH and CalOSHA for recordability and reportability under recordkeeping rules.

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:

- Wearing proper PPE when cleaning, sanitizing with solution spray provided to each site, disinfecting copy machines with disinfectant wipes, wiping light switches thermostats, and high touch surfaces as tables and chairs etc.,

- Sharing of vehicles or carpooling is still discouraged. However, in the event that you do require to carpool with a colleague we highly encourage that you wear a mask at all times during the course of your travel.

Hand Sanitizing

- Hand sanitizer dispensers have been installed in or near all entrances to building, stairwells, elevators, biometric clocks, and any classroom that does not have a sink. We prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Setting and following a hand washing schedule for staff and visitors upon arrival, before and after going to the restroom, and regular intervals throughout the day.
- Reminders have been placed near all sinks encouraging employees, visitors, and students to wash their hands for at least 20 seconds each time.
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.

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:
- Offered COVID-19 testing at no cost during their working hours.
- Encouraged to see their healthcare provider if it is after 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 with the following information:
- Who employees should report COVID-19 symptoms and possible hazards to; employees should email Mayra Flores at mflores@paralosninos.org
- 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; employees can access COVID-19 testing at any local county testing locations or with their healthcare provider.
  - 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 quarantine of a positive test.

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.
- The fact that:
  - COVID-19 is an infectious disease that can be spread through the air.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
  - An infectious person may have no symptoms.
- Methods of physical distancing of at least 3 feet and the importance of combining physical distancing with the wearing of face coverings is still highly encouraged.
- 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.
- 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 5 days after the last known COVID-19 exposure to a COVID-19 case.
- 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. This will be accomplished by allowing staff to use their personal sick time.
- 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 Department of Public Health whenever required by law, and provide any related information requested by the Department of Public Health.
- Report immediately to Cal/OSHA, Department of Public Health, Licensing and other funding entities, any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the Appendix C: Investigating COVID-19 Cases form to keep a record of and track all COVID-19 cases. The information will be made available to 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 or you have been cleared by a physician
  - At least 5 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 5 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will 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 5 days from the time the order to isolate was effective, or 10 days from the time the order to quarantine was effective.

Plan Approved by Vice President and 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: [enter name(s)]

Date: [enter date]

Name(s) of employee and authorized employee representative that participated: [enter name(s)]

<table>
<thead>
<tr>
<th>Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards</th>
<th>Places and times</th>
<th>Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers</th>
<th>Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation</th>
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### Appendix B: COVID-19 Inspections [www.dir.ca.gov/dosh/coronavirus/](https://www.dir.ca.gov/dosh/coronavirus/)

Date: 
Name of person conducting the inspection: 
Work location evaluated: 

<table>
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<tr>
<th>Exposure Controls</th>
<th>Status</th>
<th>Person Assigned to Correct</th>
<th>Date Corrected</th>
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<tbody>
<tr>
<td><strong>Engineering</strong></td>
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<td>Barriers/partitions</td>
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<td>Ventilation (amount of fresh air and</td>
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<td>filtration maximized</td>
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<td>Additional room air filtration</td>
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<td><strong>Administrative</strong></td>
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<td>Physical distancing</td>
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<td>Surface cleaning and disinfection</td>
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<td>(frequently enough and adequate</td>
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<td>supplies)</td>
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<td>Hand washing facilities (adequate</td>
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<td>numbers and supplies</td>
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<td>Disinfecting and hand sanitizing</td>
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<td>solutions being used according to</td>
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<td>manufacturer instructions</td>
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<td><strong>PPE</strong> (not shared, available and</td>
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<td>being worn)</td>
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<td>Face coverings (cleaned sufficiently</td>
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<td>often)</td>
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<tr>
<td>Gloves</td>
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<td>Face shields/goggles</td>
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<td>Respiratory protection</td>
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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), and Licensing 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, and licensing 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.

Date:

Name of person conducting the investigation:

<table>
<thead>
<tr>
<th>Employee (or non-employee*) name:</th>
<th>Occupation (if non-employee, why they were in the workplace):</th>
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<tbody>
<tr>
<td>Location where employee worked (or non-employee was present in the workplace):</td>
<td>Date investigation was initiated:</td>
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<tr>
<td>Was COVID-19 test offered?</td>
<td>Name(s) of staff involved in the investigation:</td>
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<tr>
<td>Date and time the COVID-19 case was last present in the workplace:</td>
<td>Date of the positive or negative test and/or diagnosis:</td>
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<tr>
<td>Date the case first had one or more COVID-19 symptoms:</td>
<td>Information received regarding COVID-19 test results and onset of symptoms (attach documentation):</td>
</tr>
<tr>
<td>Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):</td>
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</table>
Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

| All employees who may have had COVID-19 exposure and their authorized representatives. | Date: |
| Names of employees that were notified: |

| Independent contractors and other employers present at the workplace during the high-risk exposure period. | Date: |
| Names of individuals that were notified: |

| What were the workplace conditions that could have contributed to the risk of COVID-19 exposure? | What could be done to reduce exposure to COVID-19? |

| Was local health department notified? | Date: |

*Should an employer be made aware of a non-employee infection source COVID-19 status.*
Appendix D: COVID-19 Training Roster

Date:

Person that conducted the training:

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
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Additional Consideration #1

Cluster COVID-19 Infections and/or COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 10-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 10-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 three days 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 10-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.