

Language Academy of Sacramento

CAL/OSHA COVID-19  
Prevention Plan (WCPP)

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# Health & Safety Policy Statement

Our Written Covid-19 Prevention Program (WCPP) has been created to save lives and prevent illnesses.

At Language Academy of Sacramento (LAS), we are committed to a successful COVID-19 prevention program that includes the identification and correction of hazards and training of employees specific to COVID-19. We strive to comply with all safety & health standards, and we expect the full cooperation of our employees. This program supports the philosophy that employees' safety is of the utmost importance, and at the end of each day, "no one gets hurt or ill."

Although safety is every person's responsibility, the ultimate responsibility for the safety program lies with the School Leadership of the Language Academy of Sacramento. However, the program cannot succeed without the cooperation of all employees, independent contractors, associates, and affiliates. Everyone must be one hundred percent safety conscious in everything they do while on the job. We expect that. We are confident that with a sincere and concentrated effort from everyone, our safety goals can be achieved.

We encourage active participation in our safety program at all levels of the organization and will honor and respect constructive thoughts and ideas. No one should fear reprisal of any kind by doing the right thing to communicate safety concerns.

We want all employees to know that every reasonable step has been taken to reduce the potential exposure and spread of COVID-19 in our workplace. That is why we have implemented this Written COVID-19 Prevention Plan, which is in compliance with the California Code of Regulations (CCR) Title 8, 3205 related to their employment at Language Academy of Sacramento.

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Eduardo de León, Executive Director

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Judy Morales, Director of Business and Operations

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Dated

## 0.0 Purpose / Scope / Responsibility

The purpose of our WCPP is to evaluate, identify, and implement control measures and communicate to staff regarding the potential exposures to COVID-19 that may be present in our workplace. It also provides a framework to return employees back to work who may have tested positive to COVID-19, have symptoms of COVID-19 but tested negative, or be asymptomatic but may still be infectious.

The protocols outlined in this document will be modified based on the ongoing and updated guidance from the CDC, state and local public health agencies, and Cal / OSHA. It is the intent of this document to follow the highest levels of controls to protect our employees.

This policy applies to all our employees that may be exposed to the coronavirus as a result of the performance of their duties. This policy does not apply to remote workers who work remotely on behalf of our Language Academy of Sacramento.

The LAS Executive Director, Director of Business and Operations, and COVID-19 Coordinator are the WCPP program administrator and has overall authority and day to day responsibility for implementing the provisions of this WCPP in our workplace.

### **Supervisors:**

In addition, program supervisors are responsible for implementing and maintaining the WCPP in their assigned work areas and ensuring employees receive answers to the program's questions in a language they readily understand.

### **Employees:**

All employees are responsible for using safe and healthy work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment. Employees should feel comfortable at all times to clearly state either directly or anonymously their COVID-19 concerns to management without any fear of reprisal. Employees shall:

- Practice physical distancing using video or telephonic meetings as much as practicable and maintaining a distance of at least six (6) feet between persons at the workplace whenever possible, including but not limited to, grade-level meetings and staff meetings.
- Avoid shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) whenever possible. If employees must share workspaces, clean and disinfect shared workspaces and work items before and after use. Approved disinfections will we provide for in shared work

spaces.

- Wash hands with soap and water for at least 20 seconds and/or use hand sanitizer after interacting with people, before and after meals, after bathroom use and after contacting shared surfaces or objects.
- Cover coughs and sneezes and avoid touching eyes, nose, and mouth with in general but especially with unwashed hands.
- Avoid sharing personal items with coworkers (i.e., dishes, cups, utensils, towels).
- Notify school administrator or supervisor if any washing facilities do not have an adequate supply of suitable cleansing agents, water, single-use towels, or hand sanitizer.

No employee shall bring cleaning products and/or disinfectants into the workplace that have not been approved by the WCPP program administrator.

## 1.0 SYSTEM OF COMMUNICATION REGARDING COVID-19

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

- Employees should immediately report, via phone or in-person (if already at work), symptoms of or possible COVID -19 exposure or hazards at the workplace they may feel exposes them or others to COVID-19. They may do so without any fear of reprisal. Reports should be made to Judy Morales or Eduardo de León.

Contact Information: Judy Morales at (916) 753-5221 or [jmorales@lasac.info](mailto:jmorales@lasac.info)  
Eduardo de León at (916) 402-1139 or [edeleon@lasac.info](mailto:edeleon@lasac.info)

- Employees who have medical or other conditions that put them at increased risk of severe COVID-19 illness will be consulted as to alternative work arrangements that may include remote work opportunities or isolating their work environment using engineering, administrative, or personal protective equipment; or a combination of all these controls to reduce the chance of exposure.
- Employees shall be directed to their medical provider or to Sacramento Department of Public Health at no-cost to employee, including reimbursing employees for travel costs to the testing site (e.g., mileage or public transportation costs).
- 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 outcomes of a positive test.
- When this program is first established, and as circumstances change, we will provide information about COVID-19 hazards to our employees, including other individuals in contact with our workplaces, such as temporary staff and contractors. We will advise as to what is being done to control those hazards and our COVID-19 policies and procedures. (See Section 8, "other engineering controls, administrative controls, and personal protective equipment).

Information regarding engineering, administrative, and personal protective equipment controls may be communicated via emails, posters in common areas, written policies accessible on the Language Academy of Sacramento website, and group/individual training; in person or via remote learning.

Parents and visitors are will not be allowed beyond the main office during the first two months of implementation.

- The confidentiality of all employees who test positive for COVID-19 or who may

be potentially be exposed to COVID-19 will be kept with the utmost confidence.

- Language Academy of Sacramento will place signs and/or instructions in common areas (e.g., classrooms, main office, bathrooms, lounge, common public areas, etc.) to communicate physical distancing requirements and provide other COVID-19 infection prevention information to the general public entering the worksite and buildings.

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## 2.0 IDENTIFICATION OF COVID-19 HAZARDS

Language Academy of Sacramento shall allow for employees and authorized employee representative participation in identifying and evaluating COVID-19 hazards in the workplace. The method and system used shall be as follows: COVID-19 Reopening meeting, via email to [jmorales@lasac.info](mailto:jmorales@lasac.info) or [edeleon@lasac.info](mailto:edeleon@lasac.info) and during regularly scheduled weekly staff meetings.

- Employees shall screen themselves for COVID-19 symptoms prior to arriving at work. Any employee who has one or more symptoms shall contact their supervisor before arriving and advise they are not feeling well. They will not be allowed in the workplace. Employees must follow the CDC guidelines for self-screening at <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>
- Employees shall arrive to campus via the main office entrance and work shall complete an employee self-assessment of health **FORM -1** on paper or via the school check in system prior to starting their day. In addition, employees shall have temperature and mask check before entering the campus
- Employees may be screened at work by a trained and authorized individual. The process may include 1) a review of the self-assessment of health completed by the employee, 2) the use of non-contact thermal thermometers and 3) Face covering verification. All documented screenings shall be kept confidential and will only be shared with appropriate staff or health officials.
- Should an employee while at work state that they are feeling ill, or if symptoms are identified via screening of staff at the start of the workday, the Language Academy of Sacramento shall follow the most current and most stringent guidelines as set forth by CAL / OSHA, state and local governments and the CDC to provide support to the COVID-19 case and exposures in the workplace.
- The employee experiencing symptoms shall immediately be sent to a testing facility. All employees, temporary staff, or contractors will be notified and evaluated for exposure levels (i.e., within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" defined by this section. This definition applies regardless of the use of face coverings).
- Language Academy of Sacramento shall treat all employees, visitors, clients, and guests as potentially infectious regardless of symptoms of COVID-19 or negative COVID-19 test results. This includes conducting workplace-specific identification of all potential interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

This identification process is done initially when the program is first established and

annually thereafter or, as our school phasing evolves. See [FORM -2](#)

- All entry to the campus must be through the main office check in only. Multiple entry ways will be strictly prohibited. Employees should follow the path of travel designated throughout the campus by following designated sign and/or floor markings.
- Our evaluation of worksite-specific identification of potential exposures includes:
  - Places and time people congregate or come in contact with one another, including, but not limited to:
    - Classrooms TK-5<sup>th</sup> grade – Monday-Thursday (7am – 5pm)
    - Classrooms 6<sup>th</sup> -8<sup>th</sup> grade – Monday-Thursday (7am – 5pm)
    - SPED Classrooms – Monday-Thursday (7am – 5pm)
    - Staff Lounge and Copy Area – Monday-Friday (6am – 6pm)
    - Campus Entrances - Monday-Friday (6am – 6pm)
    - Bathrooms – Monday-Friday (6am – 6pm)
    - Hallways – Monday-Friday (6am – 6pm)
    - Front Office – Monday-Friday (6am – 6pm)
    - Elevators– Monday-Thursday (7am – 5pm)
    - Playground – Monday-Thursday (7am – 5pm)
    - Kitchen – Monday-Friday (6am – 5pm)
- For Language Academy of Sacramento indoor locations, we, in collaboration with Sacramento City Unified School District, will evaluate and implement the maximum quantity of outdoor air into the workplace and whether it is possible to increase the filtration efficiency to the highest level compatible with the existing ventilation system.
- Language Academy of Sacramento will review applicable guidance and orders from the State of California and the Sacramento County health department (LHD) related to COVID-19 hazards and prevention in general terms and specific to our industry. Resources may include; [COVID-19 and Reopening In-Person Instruction Framework & Public Health Guidance for K-12 Schools in California, 2020-2021 School Year](#), [US Department of Education Covid-19 Handbook, Volume-1, Strategies for Safely Reopening Elementary and Secondary Schools](#)
- Language Academy of Sacramento will evaluate our existing COVID-19 prevention controls and the need to implement different controls, at a minimum quarterly or when COVID-19 cases increase in the community where the business is located. This evaluation will include the evaluation of:

- Written COVID-19 policies and procedures, and the current approach to correcting unsafe or unhealthy conditions, or work practices
- Evaluation of our physical distancing procedures
- Use of face coverings, and where and how they are used
- Current engineering, administrative, and use of personal protective equipment
- At implementation of plan, the Language Academy of Sacramento will conduct weekly inspections for the first two months and bi-weekly thereafter. See [FORM -3](#)

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### 3.0 INVESTIGATING AND RESPONDING TO COVID - 19 CASES IN THE WORKPLACE

The Language Academy of Sacramento will implement an effective procedure to investigate COVID-19 cases in our workplace. See [FORM - 4](#), which will be used to initiate the investigation. This includes our procedures for verifying COVID-19 case status, receiving information regarding COVID-9 test results and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases.

When there has been a COVID-19 case in our workplace, Language Academy of Sacramento will:

- Determine the day and time the COVID-19 case was present last and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
- Determine who may have had a COVID-19 "exposure" based on staff location, daily schedule and findings from Form-4.
- Employees who had potential COVID-19 exposure in our workplace will be:
  - Employees with potential COVID -19 exposure will be given email notice within one (1) business day in a way that does not reveal any personal identifying information of the COVID-19 case; this includes their authorized representatives.
  - Includes independent contractors and other employers present in the workplace during the high-risk exposure event.
- Language Academy of Sacramento will offer COVID-19 testing at no cost to employees during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with the information on benefits described this manual.
- Continue to investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.
- Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by Language Academy of Sacramento shall be provided in a manner that ensures the confidentiality of employees. An exception may be to provide to the Sacramento Public Health Department, CDPH, the Division, and the National Institute for Occupational Safety and Health (NIOSH), or as otherwise

required by law immediately upon request.

- Language Academy of Sacramento shall ensure that all employee medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace. However, unredacted medical records shall be provided to the Sacramento Public Health Department, CDPH, the Division, NIOSH, or as otherwise required by law immediately upon request. This may not apply to records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

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## 4.0 CORRECTION OF COVID-19 HAZARDS

Language Academy of Sacramento either through our routine inspection process, COVID-19 case investigation, or via employee / other verbal or written notification processes of a COVID -19 hazard shall; implement an effective policy and procedure for correcting unsafe or unhealthy conditions, work practices, policies, and procedures. This will be done in a timely manner based on the severity of the hazard. See [FORM -5](#).

- The administrator/supervisor/manager/safety coordinator and WCPP will establish the correction based on the following:
  - **Imminent COVID-19 Hazard:** An Imminent Hazard is one that is immediately dangerous to all employees, guests, visitors, contractors etc. Employees should stop the activity and notify their supervisor/manager/safety coordinator to take immediate corrective action.

If the imminent hazard cannot be corrected immediately, the area shall be declared "off-limits" and/or secured until the hazard is corrected. Deep cleaning and disinfecting of the area will be completed before re-opening that area. COVID-19 testing may be mandatory.
  - **Serious COVID-19 Hazard:** A Serious Hazard is one that has substantial potential to cause high exposure to COVID -19. Employees, guests, visitors, contractors etc., will be protected and notified of potential exposure. COVID-19 testing may be mandatory.
  - **General COVID-19 Hazard:** A General Hazard is one, which may affect the safety and health of employees and should be investigated. Employees, guests, visitors, contractors etc., will be protected and notified of potential exposure.
- Employees will be protected from any identified serious hazards until corrected. Those employees responsible for correcting the hazard will be provided with the required safeguards.

## 5.0 TRAINING AND INSTRUCTION

Language Academy of Sacramento will provide training in the general description of COVID-19, symptoms, when to seek medical attention, how to prevent its spread, and Language Academy of Sacramento's procedures for preventing the spread of the disease at the workplace. The training may consist of reviewing written documentation, online video training and/or acknowledgment of receipt of LANGUAGE ACADEMY OF SACRAMENTO Written COVID-19 Prevention Plan (WCPP). FORM – 6 will be used unless there is an alternate training completion certificate.

We will provide effective training and instruction that includes:

- Policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which our employees may be entitled under applicable federal, state, or local laws such as; workers' compensation, Federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, and Language Academy of Sacramento leave policies, and leave as applicable to position.
- Information regarding COVID-19:
  - COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs or exhales.
  - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth (less common).
  - An infectious person may have no symptoms (asymptomatic).
  - Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
  - 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 handwashing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing facility, and that hand sanitizer does not work if the hands are soiled.
  - Proper use of face coverings and 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 not coming to work when feeling ill and obtaining a COVID-19 test if the employee has COVID-19 symptoms.
- No employee or visitor will be allowed on campus without a face covering unless a medical exemptions has been established.
- All employees are required to participate and complete COVID-19 training as assigned.

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## 6.0 PHYSICAL DISTANCING

All employees at Language Academy of Sacramento shall be separated from other persons by at least six feet, except where we can demonstrate that six feet of separation are not possible (see Section 8.0), and except for momentary exposure while persons are in movement.

Methods of physical distancing Language Academy of Sacramento may use include: telework or other remote work arrangements; reducing the number of persons in an area at one time, including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow a greater distance between employees

- Eliminating the need for workers to be in the workplace – e.g., telework or other remote work arrangements. Determination may vary based on position.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures to allow a greater distance between employees.

## • 7.0 FACE COVERINGS

Language Academy of Sacramento provides clean, undamaged face coverings and ensures 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 CDPH or SDPH department.

Employees will not be allowed to wear ONLY a face shield. If an employee chooses to wear a face shield, it must be worn together with a face covering for additional protection. The only exception will be when face shields are recommended for those with hearing impairments, or for communicating with a person who is hearing impaired, where the ability to see their mouth is essential for communication.

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 has been supplied to the area and has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with 8 C.C.R. section 5144 or other safety orders.

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. This may include effective non-restrictive alternatives such as a face shield with a drape on the bottom if their condition or disability permits it, video or telephonic conferencing, or outdoor meetings where 6 feet distance can be achieved.

- Specific tasks that cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons.

Employees conducting a student assessments or 1:1 instruction that requires a clear view of the employees face and/or mouth shall be allowed to wear a face shield, however, assessments must be conducted behind protection of plexi-glass.

- Any employee exempted from 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.

Language Academy of Sacramento shall not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required.

We shall not prevent an employee from wearing a face-covering when not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.

Language Academy of Sacramento shall communicate our face-covering policy with non-employees such as guests, clients, visitors, temporary staff, contractors, parents and students.

Language Academy of Sacramento has created procedures to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public.

Employees unwilling to meet with any person not wearing a face mask shall do so without fear of reprisal. The employee can create an alternative meeting solution (e.g. video or telephonic conferencing). In addition, the employee may seek the support of administration to generate a resolution.

## 8.0 OTHER ENGINEERING CONTROL, ADMINISTRATIVE CONTROLS, AND PERSONAL PROTECTIVE EQUIPMENT

### Engineering Controls

At Language Academy of Sacramento fixed work locations (where it is not possible to maintain the physical distancing requirement at all times), we shall install cleanable (non-porous) solid partitions that effectively reduce aerosol transmission between the employee and other persons.

Additional examples we may implement for situations where we cannot maintain at least six feet between individuals: plexi-glass partition and/or plastic sheeting

For our buildings with mechanical or natural ventilation, we will maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees; such as from excessive heat or cold or wildfire smoke.

Additional examples we may maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems:

- Classrooms will have an air purifier with a minimum of 1300 sq. ft. capacity to be used on days when natural air cannot be achieved due to hazards, such as heat and wildfire smoke.
- All HVAC systems and filters will be maintained by the Sacramento City Unified School District (SCUSD) Facilities Department. The school will maintain a 6 month filter rotation, unless a greater frequency is determined necessary.
- Any failure of HVAC systems should be reported immediately to the Plant Manager and administration.

### Administrative Procedures / Disinfecting Procedures

Language Academy of Sacramento has implemented the following additional controls along with having our written procedures. We will implement the following cleaning and disinfection measures for frequently touched surfaces.

General protocols are as follows since we recognize that high-traffic and high-touch common areas in the workplace need, to the extent possible, cleaning and disinfecting to limit the spread of the COVID-19 virus.

Language Academy of Sacramento will assign personnel and establish routine schedules to clean and disinfect common surfaces and objects in the workplace. This includes, but is not limited to, copy machines, containers, counters, tables, desks, chairs, benches, door handles, knobs, hydration stations, refrigerators, restroom and bathroom surfaces, and trash cans.

The disinfecting process includes providing disinfecting products that are EPA approved for use against the virus that causes COVID-19 and following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time.)

### **Cleaning and Disinfecting Following a Confirmed COVID-19 Case**

1. Temporarily close the general area where the infected employee or guest worked/visited until cleaning is completed.
2. If possible, open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before cleaning and disinfecting the area.
3. Conduct deep cleaning of the entire general area where the infected employee worked and may have been, including breakrooms, restrooms, and travel areas, with a cleaning agent approved for use by the EPA against the coronavirus.
4. Custodial personnel (or other designees) cleaning the area must be equipped with the proper personal protective equipment for COVID-19 disinfection (gloves, eye protection, mask and shield, if required).

We have:

- Identified and regularly clean and disinfect frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, and bathroom surfaces.
- Informed employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection. Ensuring adequate supplies and adequate time for it to be done properly.
- Prohibited the sharing of personal protective equipment and, to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools.

- Implemented procedures when it is not feasible to prevent sharing. Sharing shall be minimized, and such items and equipment shall be disinfected between uses by different people.
- Implemented procedures for the cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.
- Properly trained an employee(s) designated to perform a routine or deep cleaning on the hazards associated with the cleaning chemicals, provided appropriate PPE or their use, and comply with the Hazard Communication standard CCR Title 8, 5194. <https://www.dir.ca.gov/title8/5194.html>.
- To protect our employees from COVID-19 hazards, we shall evaluate our handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

We will post signage in bathroom areas, if feasible, to encourage employees to wash their hands for at least 20 seconds each time. We will not use hand sanitizers in lieu of handwashing facilities. The use of hand sanitizer with methyl alcohol is prohibited.

- Additional methods may also include:
  - Employees shall cover coughs and sneezes and avoid touching eyes, nose, and mouth with unwashed hands.
  - Employees must avoid sharing personal items with coworkers (i.e., dishes, cups, utensils, towels).
  - Employees shall notify their administrator or supervisor if any washing facilities do not have an adequate supply of suitable cleansing agents, water, single-use towels, or blowers.
- No employee shall bring cleaning products and/or disinfectants into the workplace that have not been approved by the WCPP program administrator.

### **Personal Protective Equipment (PPE) Used to Control the Exposure and Spread of COVID-19**

Language Academy of Sacramento shall evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as masks, gloves, goggles, and face shields, and provide such personal protective equipment as needed.

We shall:

- Evaluate the need for respiratory protection in accordance with the Cal/OSHA respiratory protection regulation CCR Title 8, 5144 (Respiratory Protection Program) when the physical distancing requirements in section 6.0 are not feasible or are not maintained.
- Provide and ensure the use of respirators in accordance with Title 8, 5144 when deemed necessary; in accordance with CCR Title 8, section 332.3. 4.

Items that employees come in regular physical contacts 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 using a cleaning/sanitizing crew or providing the employees with the materials and training to do it themselves.

## 9.0 REPORTING, RECORDKEEPING, AND ACCESS

It is Language Academy of Sacramento 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 connection with any employment.
- Maintain records of the steps taken to implement our (WCPP) in accordance with CCR Title 8 Section 3203(b).
- Make our WCPP available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
- We shall use our COVID-19 Investigation [FORM-4](#) as a log 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.

[FORM-4](#) shall include the employee's name, contact information, occupation, the location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. Medical information shall be kept confidential in accordance with subsections Section 3.0.

## 10.0 EXCLUSION OF COVID-19 CASES FOR THE PURPOSE TO LIMIT TRANSMISSION OF COVID-19 IN THE WORKPLACE.

Language Academy of Sacramento shall ensure that COVID-19 employee cases shall remain away from the workplace until the return to work requirements of Section 11.0 of this manual are met. Such as:

- We shall exclude employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- For employees excluded from work under this section and otherwise able and available to work, we shall continue and maintain an employee's earnings, seniority, and all other employee rights and benefits, including the employee's right to their former job status, as if the employee had not been removed from their job.
- We may choose to use our employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.
- This section does not limit other applicable laws or Language Academy of Sacramento policies that may provide greater protections.
- At the time of exclusion, we shall provide the employee with information on benefits described in Section 5.0 (training) and section 10.0.

Language Academy of Sacramento is not required to reassign workers who have not been excluded or isolated by the local health department. The Language Academy of Sacramento need not exclude them if they are temporarily reassigned to work where they do not have contact with other persons until the return to work requirements of section 11.0 of this manual are met.

## 11.0 RETURN TO WORK CRITERIA

Language Academy of Sacramento policy will comply with the following criteria, or the Centers for Disease Control (CDC) whichever is more stringent:

COVID-19 cases with COVID-19 symptoms shall not return to work until:

1. At least 24 hours have passed since a fever of 100.4, or higher has resolved without the use of fever-reducing medications;
2. COVID-19 symptoms have improved; **and**
3. At least 10 days have passed since COVID-19 symptoms first appeared.

COVID-19 cases that tested positive but never developed COVID-19 symptoms shall 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.

1. A negative COVID-19 test shall not be required for an employee to return to work. As long as the appropriate quarantine time has been met. A doctor's note may be require.
2. If an order to isolate or quarantine an employee is issued by a local or state health official, the employee shall not return to work until the period of isolation or quarantine is completed, or the order is lifted.
3. If no period was specified, then the period shall be 10 days from the time the order to isolate was effective or 14 days from the time the order to quarantine was effective.
4. If there are no violations of local or state health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety.

## 12.0 MULTIPLE COVID-19 INFECTIONS AND COVID-19 OUTBREAKS.

Language Academy of Sacramento will enforce this section of our WCPP if it has been identified by a local health department as the location of a COVID-19 outbreak or when there are three or more COVID-19 cases in an exposed workplace within a 14-day period.

This section shall apply until there are no new COVID-19 cases detected in our workplace for a 14-day period.

### **COVID-19 testing.**

- Language Academy of Sacramento shall provide COVID-19 testing to all employees at the 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(s).
- COVID-19 testing shall be provided at no cost to employees during employees' working hours.
- COVID-19 testing shall consist of the following:
  - All employees in the exposed workplace shall be tested and then tested again one week later.
  - Negative COVID-19 test results of employees with COVID-19 exposure shall 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, Language Academy of Sacramento shall provide continuous 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 this section no longer applies.
  - **LANGUAGE ACADEMY OF SACRAMENTO** shall provide additional testing when deemed necessary by the CAL/OSHA Division through the Issuance of Order to Take Special Action, in accordance with title 8 section 332.3. (c)

### **Exclusion of COVID-19 cases.**

Language Academy of Sacramento shall ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with Sections 10.0 and 11.0 of this manual and local health officer orders if applicable.

### **Investigation of workplace COVID-19 illness.**

Language Academy of Sacramento shall immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with section 3 of this manual.

### **COVID-19 Investigation, review, and hazard correction.**

In addition to the requirements of subsection Section 2.0 and 4.0, we shall immediately review potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent the further spread of COVID-19.

The investigation and review shall 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; and lack of physical distancing.
- An updated review shall take place every thirty days that the outbreak continues, in response to new information, to new or previously unrecognized COVID-19 hazards, or when otherwise necessary.
- Language Academy of Sacramento shall implement changes to reduce the transmission of COVID-19 based on the investigation and review. We shall 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, and other applicable controls.

### **Notifications to the local health department.**

Language Academy of Sacramento shall contact the local health department immediately but no longer than 48 hours after the employer knows, or with diligent inquiry would have known, of three or more COVID-19 cases for guidance on preventing the further spread of COVID-19 within the workplace.

Language Academy of Sacramento shall 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 shall continue to notify the local health department of any subsequent COVID-19 cases at the workplace.

Effective January 1, 2021, we shall provide the required information to the local health department according to Labor Code section 6409.6.

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## 13.0 MAJOR COVID-19 OUTBREAK

*If the Language Academy of Sacramento experience 20 or more COVID-19 cases within a 30-day period. This section shall apply until there are no new COVID-19 cases detected in our workplace for a 14-day period.*

### **COVID-19 testing.**

Language Academy of Sacramento shall provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at the exposed workplace during the relevant 30-day period(s) and who remain at the workplace.

COVID-19 testing shall be provided at no cost to employees during working hours.

### **Exclusion of COVID-19 cases.**

Language Academy of Sacramento shall ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with Section 10.0 and 11.0 and any relevant local health department orders.

### **Investigation of workplace COVID-19 illnesses.**

Language Academy of Sacramento shall comply with the requirements of Section 3.0

### **COVID-19 hazard correction.**

In addition to the requirements of Section 4.0, we shall take the following actions:

- In buildings or structures with mechanical ventilation, Language Academy of Sacramento shall 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, the Language Academy of Sacramento shall use filters with the highest compatible filtering efficiency.
- 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.
- Determine the need for a respiratory protection program or changes to our existing respiratory protection program under Title 8, 5144 <https://www.dir.ca.gov/title8/5144.html>, to address COVID-19 hazards.

- Evaluate whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Implement any other control measures deemed necessary by the CAL/OSHA Division through the Issuance of Order to Take Special Action, in accordance with title 8 section 332.3.

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## Appendix – B

**FORM -1** Team Members Self-Assessment of Health

**FORM -2** Identification of COVID-19 Hazards

**FORM -3** Weekly COVID-19 Inspection

**FORM -4** Investigation of COVID-19 Cases

**FORM –5** Correction of COVID-19 Hazards

**FORM -6** COVID-19 Training Roster

Sample Notification of a COVID Case

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## Team Member Coronavirus COVID-19) Self -Assessment FORM - 1

**Must be completed daily (Today's Date)** \_\_\_\_\_

Language Academy of Sacramento is taking precautionary measures of all individuals working in or performing work at our offices by completing a COVID Self -Assessment. Language Academy of Sacramento reserves the right to evaluate the potential for health and safety risks at our discretion and deny access to our premises. Thus:

I attest that the information below is accurate to the best of my knowledge.

- In the last 14 days, I have not traveled to or returned from a destination with a Travel Health Notice issued by the Centers for Disease Control and Prevention (CDC) with a **Level 2 OR Level 3 Warning** for COVID-19. <https://wwwnc.cdc.gov/travel/notices>
- In the last 14 days, I have not experienced a cough, shortness of breath or have had trouble breathing, had a fever, chills, repeated shaking with chills, muscle pain, headache, sore throat, or a new loss of taste or smell.
- In the last 14 days, to the best of my knowledge, I have not been in close contact with a **confirmed or suspected** COVID-19 case.

In addition, I agree to

- Practice social distancing and other acceptable pandemic hygiene practices. This includes remaining 6 feet away from coworkers and wearing a face covering at all times when away from my desk or office or in common areas.
- Use good hygiene if I cough or sneeze, not share office equipment or supplies, and will wipe down my work surfaces during my shift with a disinfectant if needed.
- Complete the Voluntary Respiratory Use form if I wear choose to wear a respirator.
- Not congregate at other team member's cubicles or in breakrooms. I will eat at my desk since I must wear face coverings in the breakrooms and cannot eat while wearing the face covering.
- To stay home and immediately notify my supervisor if I have **ANY** one of these symptoms. These symptoms may appear 2-14 days after exposure to the virus: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>, fever, cough, shortness of breath or difficulty breathing, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell

**Signature:** \_\_\_\_\_

**NOTE:** If the answer to **any question** above indicates possible COVID symptoms or exposure, the individual is **not cleared** to enter any Language Academy of Sacramento campus and is required to speak with their supervisor immediately. The Safety Assessment shall be forwarded to Human Resources.

**Identification of COVID-19 Hazards – [FORM 2](#)**

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, classrooms, 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)]

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

**Weekly COVID-19 Inspection FORM -3**

**Date:** [enter date]

**Name of person conducting the inspection:** [enter names]

**Work location evaluated:** [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
<b>Administrative</b>			
Physical distancing			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Handwashing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions used according to manufacturer instructions			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
<b>PPE (not shared, available, and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

**Investigation of Language Academy of Sacramento COVID-19 Cases [FORM -4](#)**

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. Language Academy of Sacramento will provide all COVID-19 testing or related medical services in a manner that ensures the confidentiality of employees, except for 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.

**Date:** [enter date]

**Name of person conducting the investigation:** [enter name(s)]

Employee or non-employee* name.		Job Title (if non-employee, state reason for being in the workplace	
The location where the employee worked (or where non-employee was present):		Date investigation was initiated:	
Was the COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was the last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
The date the case first had one or more COVID-19 symptoms:		Information received regarding COVID-19 test results and onset of symptoms (attach documentation):	
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):			

<b>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:</b>			
<b>All employees who may have had COVID-19 exposure and their authorized representatives.</b>	<b>Date:</b>		
	<b>Names of employees that were notified:</b>		
<b>Independent contractors and other employers present at the workplace during the high-risk exposure period.</b>	<b>Date:</b>		
	<b>Names of individuals that were notified:</b>		
<b>What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?</b>	<b>What could be done to reduce exposure to COVID-19?</b>		
<b>Was the local health department notified?</b>		<b>Date:</b>	

**Correction of COVID-19 Hazards – [FORM 5](#)**

The following form shall be used by Language Academy of Sacramento for the implementation of our system and method for correcting unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard regarding COVID-19.

**Person(s) responsible for correcting the COVID-19 hazards [enter name(s)]**

**Date: [enter date]**

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

What interaction, area, activity, work task, process, equipment, and material potentially exposed employee to COVID-19 hazards	Date Identified and person/department responsible for correcting	Type of Correction: Engineering (describe); Administration (describe), Personal protective Equipment( describe)	Date Corrected



## Appendix – C

### Return to Work Criteria (See Section 11.0)

The School Administrator will consult with state and local public health agencies for mitigation practices and response protocols.

The Language Academy of Sacramento will follow the Cal-OSHA Title 8, 3205 Section 11 Return to Work Criteria AND California Public Health Department strategies, listed below, for returning employees to work. Note that some variation may occur depending on our local public health department and unique circumstances. We will, to the best of our ability, use whatever criteria are more stringent.

Employees	Minimum Criteria for Returning to Work
<p><b>Symptomatic Positive</b> COVID -19 Cases with COVID -19 symptoms shall not return to work until.</p>	<ol style="list-style-type: none"> <li>1. At least 24 hours have passed since a fever of 100.4, or higher has resolved without the use of fever-reducing medications;</li> <li>2. COVID-19 symptoms have improved; and</li> <li>3. At least 10 days have passed since COVID-19 symptoms first appeared.</li> </ol>
<p><b>Asymptomatic Positive</b>  COVID-19 cases that tested positive but never developed COVID-19 symptoms shall 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.</p>	<ol style="list-style-type: none"> <li>1. A minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.</li> </ol>
<p><b>Note: A negative COVID-19 test shall not be required for an employee to return to work. (This is interesting)</b></p>	
<p><b>Order to isolate by State or Local Health Official.</b></p>	<p>The employee shall 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 shall be 10 days from the time the order to isolate was effective or 14 days from the time the order to quarantine was effective.</p>
<p>If there are no violations of local or state health officer orders for isolation or quarantine, the CAL/OSHA Division may, upon request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community's health and safety. In such cases, the employer shall develop, implement, and maintain effective control measures to prevent transmission in the workplace, including providing isolation for the employee at the workplace and, if isolation is not possible, the use of respiratory protection in the workplace.</p>	

<b>Employee Symptoms</b>	<b>California Playbook - Minimum Criteria for Return to Work</b> <a href="#">COVID-19 Employer Playbook Supporting Safer Environments for Workers and Customers (ca.gov)</a> (As of September 25, 2020) Consult the most recent CDC guidance prior to allowing the worker to return to work)
<b>Symptomatic Positive Workers with symptoms who are laboratory confirmed to have COVID-19</b>	At least 1 day (24 hours) has passed since last fever, defined as resolution of fever without the use of fever-reducing medications and improvement in symptoms (e.g., cough, shortness of breath); and at least 10 days have passed since symptoms first appeared.
<b>Asymptomatic Positive Workers who never had symptoms and are laboratory confirmed to have COVID-19</b>	A minimum of 10 days has passed since the date of their first positive COVID-19 test. If they develop symptoms, then the criteria for laboratory-confirmed cases with symptoms apply
<b>Symptomatic Negative Workers who had symptoms of COVID-19 but test result returned negative</b>	Use the same criteria for return to work as laboratory-confirmed cases.
<b>Asymptomatic Negative Workers who never had symptoms but were tested due to close contact with a laboratory-confirmed case-patient and were negative</b>	Workers should quarantine at home for 14 days after the last known close contact with the case-patient. Symptoms can develop even after testing negative within 14 days after exposure. The LHD may consider allowing an earlier return to work only for a worker in a critical infrastructure industry in which the essential operations of the workplace would be compromised by quarantine of the worker, and no alternate staff can perform the same role.*
<b>Symptomatic Untested Workers who had symptoms of COVID-19 but were not tested</b>	Testing is highly recommended. If the worker cannot be tested, use the same criteria for return to work as laboratory-confirmed cases.
<b>Asymptomatic Untested Workers who had close contact with a laboratory confirmed case patient at work, home, or in the community and do not have symptoms.</b>  <b>OR</b>  <b>Workers who refuse or are unable to be tested after close contact with a laboratory-confirmed case, despite a recommendation for testing from LHD or healthcare provider, and do not have symptoms</b>	Workers should be quarantined at home for 14 days after the last known close contact with the case-patient. Testing is highly recommended; if testing has not occurred, the LHD may consider allowing a worker who had close contact with a confirmed case to continue to work only in a critical infrastructure industry in which the essential operations of the workplace would be compromised by quarantine of the worker and no alternate staff can perform the same role. * Workers who develop symptoms of COVID-19 while in quarantine should contact their healthcare provider. Even if they are not tested, the same criteria for return to work should be used as laboratory-confirmed cases.

\* Regarding the following two groups of workers in a critical infrastructure workplace outbreak:

(a) asymptomatic workers who tested negative,

(b) workers who were close contacts to confirmed cases: Where 14-day quarantine would compromise essential operations, the LHD may determine that some workers in these two groups may return to work sooner than 14 days by considering certain criteria specific to the workplace and worker:

- The worker is able to wear a surgical mask throughout the workday, except while eating and comply with all infection prevention procedures. A cloth face-covering may also be used in the event of mask shortage.
- The facility has implemented all best practice infection prevention procedures, as determined by the Sacramento County Department of Public Health.
- Pre-screening to assess worker temperature and symptoms prior to starting work has been implemented, ideally before entering the facility.
- The worker is able to self-monitor for temperature and symptoms at home and work.
- The worker is able to maintain a minimum of six feet of distance from other workers in the workplace. Of note, six feet does not prevent all transmission of SARS-CoV-2.
- Physical barriers are in place between fixed worker work locations to supplement distancing.
- Cleaning and disinfection of all areas and shared equipment can be performed routinely in the workplace.