



Chancellor William McGill School of Success COVID-19 Prevention Program (CPP)

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

Date: March 18, 2021

Authority and Responsibility

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

All employees are responsible for using safe work practices, following all directives, policies and procedures, 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.
- Comply with the COVID19 Preventive Plan approved by the McGill Board October 15, 2020.

Employee participation

Staff met on Mar. 3, 2021. Feedback was provided via staff survey that was shared with Board on March 18, 2021. A copy of this plan was shared with staff via email. Opportunity to review will be given during April 5-9, 2021.

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: reviewing this plan, following cleaning protocols, reporting any concerns, making recommendations.

Employee screening

All employees, students, and parents shall wear a mask, get their temperature taken, and when available, sanitized with an air mist upon entering campus.

We screen our employees during school closure every two months for staff providing on-site small group support. Once school is reopened, McGill will adhere to the recommendations of the California Department of Education Public Health Guidelines (CDEP). The County of San Diego also provides free clinics throughout the county where our employees may go for screening.

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:

- To the extent possible, Principal will evaluate positive COVID19 exposure to determine origin of contact
- Principal and Health Clerk will evaluate the severity of the hazard
- After the Principal has determined who may have been exposed to COVID19 case, she will provide timely notification and information of COVID19 testing sites.
- When the hazard has deemed to be a credible threat, provide quarantine option via distance learning
- Obtain negative COVID19 test via guidelines of exposure/positive COVID19 result.

Control of COVID-19 Hazards

Physical Distancing

When possible, we ensure the CDPH recommended physical distancing at all times in our workplace by:

- Reducing the number of persons in an area at one time, including visitors.
- Creating cohorts of students and staff to avoid cross-contact with other cohorts. This shall include lunch & recess.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel. Door signs requiring face masks and health standards.
- Portable hand wash stations located throughout the school to minimize congregation of students in a single area.
- Restrooms use is limited to two female, two male students at a time to ensure social distancing guidelines
- Staggered arrival, departure, work, and break times.
- Separate pick-up drop-off areas for TK-2nd and 3rd-5th.
- Allowing telework or other remote work arrangements when a classroom/zone has been closed due to COVID-19 exposure to at least two individuals.
- Students will be kept at least three feet apart
- In situations where six feet of physical distancing cannot be achieved, staff and students shall separate to the extent possible in the given space.

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.

- McGill has cloth and disposable face coverings available for students, staff, and visitors.
- Cloth face coverings are to be washed every week.
- Face shields are also available for staff and students (upon request).

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

- When an employee is alone in a room or when teaching via distance learning.
- 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.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability. Alternatives will be considered on a case-by-case basis
- Specific tasks where mask impedes tasks and 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 implement the following measures for situations where we cannot maintain at least six feet between individuals: We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

- At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, McGill shall install cleanable solid partitions (plexiglass dividers) that effectively reduce aerosol transmission between the employee and other persons.
- For buildings with mechanical or natural ventilation, or both, McGill shall 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, for instance from excessive heat or cold.
- Employers shall implement cleaning and disinfecting procedures, which require:
 1. Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The employer shall inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
 2. Prohibiting 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. 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. High touch points (door knobs) shall be disinfected between users.
 3. Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

Cleaning and disinfecting

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

- Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, doorbells, equipment, tools, handrails, handles, controls, bathroom surfaces, school supplies, and laptops. The employer shall inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
- Prohibiting 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. 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. High touch points shall be disinfected between users.
- Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

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

Have McGill custodial clean/sanitize the area, materials, and equipment used by COVID19 case during the high-risk period. Site employees have been properly trained to sanitize according to COVID19 guidelines.

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 having sanitation wipes available, training staff on how to sanitize shared items, having custodian sanitize door knobs/stair rails, bathroom door handles, etc. cleaned periodically throughout the day.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Purchased 13 portable hand wash stations
- Have a 40-minute lunch segment for students and staff. Encourage and allow time for employee and student handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage on-site employees to wash their hands for at least 20 seconds each time.
- Provide employees with training and hand-washing video on effective technique

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.
- Allowed to work via distance learning upon a confirmed case of a COVID19 case in their teaching cohort.
- Information on benefits described in Training and Instruction, and Exclusion of COVID-19 Cases, below, will be provided to them.

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:

- Employees should report COVID-19 symptoms and possible hazards to Principal Sandoval and/or site secretary/health clerk via email or in person.
- 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, employees can access COVID-19 testing:
Via county testing sites, and/or their health plans
- 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. Employees will be referred to San Diego County free testing sites. A map will be given detailing the various locations throughout the county that provide free testing.
- 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 of at least six feet 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.
- Schedule time during April 5-9 to train staff on procedures and safety measures.
- Additional training may be required if a confirmed case is reported.

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 14 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 employer-provided employee sick leave benefits, legal statutes providing sick-time for COVID19 positive employees, rights and benefits, where permitted by law and when not covered by workers' compensation.
- 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.
- 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 14 days from the time the order to quarantine was effective.
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Norma Sandoval
Principal
McGill School of Success

Dated

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: Principal Norma Sandoval

Date: March 22, 2021

Name(s) of employee and authorized employee representative that participated: Joseph Mendoza (counselor), Roberto Sanchez (music teacher)

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
Classrooms	During school hours	Low-Medium - based on student COVID19 exposure	Air purifier, smogger, plexiglass barriers
Office	Work Hours	Medium-High - based on public/student COVID19 exposure	Air purifier, plexiglass barriers
Staff Lounge	Work Hours	Low-Medium - based on coworker COVID19 exposure	Air purifier, sanitizing wipes
Entryways	Work Hours	Medium-High - based on individuals with COVID19 exposure	Limit entry to students/staff, Temperature checks, 6ft markers, hand sanitizer, cleaning stations
Restrooms	Work Hours	Low-Medium - based on public/student COVID19 exposure	Limit number of users at a time, Sanitizing wipes, Lysol
Hallways	Work Hours	Low-Medium - based on staff/student COVID19 exposure	6ft markers

Appendix B: COVID-19 Inspections

Date: March 22, 2021

Name of person conducting the inspection: Principal Norma Sandoval

Work location evaluated: McGill School of Success 3025 Fir St. San Diego, CA 92102

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions	1:1 for students and Staff	Principal Sandoval & staff	February 2020
Ventilation (amount of fresh air and filtration maximized)	1 per classroom; 2 for Auditorium		March 2021
Administrative			
Physical distancing	Floor markers	M. Blevins secretary	Sept 2020
Surface cleaning and disinfection (frequently enough and adequate supplies)	Per class: Sanitation wipes, Lysol air spray Cleaning / disinfectant solutions in stock	Custodians & site secretaries	On-going
Hand washing facilities (adequate numbers and supplies)	13 additional portable stations K-2nd Grade classroom sinks	Principal Sandoval/ Custodian	March 2021
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions	1 per class: 1gal hand sanitizer 500ml sanitizer,		
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)	1:1 Masks for students, staff, & visitors		
Gloves	Available for staff	Secretary	Sept 2020
Face shields/goggles	1 per teacher	Health Clerk	Sept 2020
Respiratory protection	To be determined	Principal Sandoval	

Appendix C: Investigating COVID-19 Cases

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

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

Date: _____

Name of person conducting the investigation: _____

Employee/ non-employee name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the investigation:	
Date and time the COVID-19 case was last present in the workplace:		Date of the positive or negative test and/or diagnosis:	
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):			

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:		
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: April 5, 2021 (Upon return from Spring Break)

Person that conducted the training:

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

Should McGill be 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 (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

Should McGill experience 20 or more COVID-19 cases within a 30-day period (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**.

Additional Consideration #3

COVID-19 Prevention in Employer-Provided Housing

McGill does NOT have workers in employer-provided housing.

Additional Consideration #4

COVID-19 Prevention in Employer-Provided Transportation to and from Work

McGill does NOT provide employer-provided motor vehicle transportation to and from work.