

GRATTON SCHOOL DISTRICT

COVID-19 PREVENTION PLAN

AS MANDATED BY:

CCR Title 8 Sections 3205, 3205.1, 3205.2, 3205.3, 3205.4

**Gratton School District
COVID-19 Prevention Program (CPP)**

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

Authority and Responsibility

The Superintendent has the overall authority and responsibility for implementing the provisions of this CPP at the School District. The CPP Officer for the School District is:

Wendy Williams, Superintendent
wwilliams@grattonschool.net
209.632.0505

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

The School District will implement the following identification and evaluation strategies:

- 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, a school district facility
- 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 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 COVID-19 policies and procedures.

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by contacting the school/district office

Employee screening

- Each day each employee must record a written wellness check on the Daily Assessment form provided by the District. This wellness check will be used as a guide to determine if the employee continues to work or will be sent home based on the scenarios below.
- Employees will be required to check their own temperature each and every day prior to coming to work. **Any temperature of 100.4 degrees Fahrenheit or higher is defined as a fever**

The School District will maintain these confidential documents for one (1) year.

Correction of COVID-19 Hazards

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

- The severity of the hazard will be assessed. Appropriate work orders, procedures, or other mitigation strategies will be implemented within 3 working days.
- The CPP Officer is responsible for timely correction.
- Follow-up measures will be taken to determine if the mitigation strategies have been effective.

Control of COVID-19 Hazards

Physical Distancing

Where possible, the School District will ensure at least six feet of physical distancing at all times:

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- All the School District sub-contractors, vendors or anybody else making contact at the school site are required to be checked in to the office.
- **The School District requires a minimum of 6' of physical distancing at all times by all employees.**
- Provide single point of entrance to the site. Always maintain 6 ft minimum physical distancing.
- Conduct a daily health assessment.
- Any individual that appears to be unwell will NOT be granted access to the site or allowed to start work.
- Require sick workers/employees – and those displaying flu-like symptoms – to stay home. (“Worker/Employee” means worker or employee for the School District, subcontractors, designers, consultants, etc.)
- Send employees home immediately who show signs and symptoms of flu-like or acute respiratory illness symptoms
- Hand Sanitizer and appropriate protective gloves shall be made available throughout each site and office, as necessary.
- Encourage respiratory etiquette, including covering mouth and or nose when coughing and/or sneezing. Cover the mouth and nose with a tissue. If a tissue is not immediately available cough or sneeze into your sleeve, not your hands.
- Signage will be posted throughout District buildings and work areas to raise awareness.
- Minimize the number of employees working within a certain area of a (6' of physical distance to be maintained at all times).
- Encourage employees not to share tools or work areas; if this does take place ensure the tools/areas are disinfected after use.
- Ensure routine cleaning of frequently touched surfaces including the following: door handles, all surfaces, equipment, and tool handles.
- Use of shift-work to minimize the number of employees working within certain areas.
- Stagger break and lunch time to avoid employees from gathering in one location.
- As possible, only perform critical/essential activities.
- No gatherings of employee of more than 10 people, including: breaks, lunch, and meetings. If more than ten employees are involved in a meeting, procedures must be followed to minimize contact.
 - Seats placed at least 6' apart in all directions.
 - Handwipes be provided
 - Each employee will be assigned a place to sit.
 - Handwashing will be encouraged and sanitizer will be provided.
 - Gloves will be available.
 - Masks or faces shields be provided and will be required while inside the building.
- Rotating work schedules will be considered when appropriate. Appropriate schedules could include:
 - Staggered start and ending times
 - AM/PM schedule
 - Alternating days
- All meetings are encouraged to be call-in/video conference; this includes both office and field meetings. Any meeting or training session attended by employees must provide for physical distancing of 6'.
- Minimize number of employees at a work location based on the size of the work location. No more than five (5) people per 1000 square feet inside a building.
- Encourage employees not to carpool unless they are members of the same household.
- No physical greetings such as a handshake or hug.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

Face Coverings

Each site will 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

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Public Health (CDPH) or local health department. Employees may provide their own face coverings or use the disposable face coverings provided at the point of entry to the site.

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

- When an employee is alone in an office or workplace.
- 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 wearing respiratory protection in accordance with CCR Title 8 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.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

The following measures will be implemented for situations where the School District cannot maintain at least six feet between individuals:

- The use of partitions or barriers in classrooms and offices.

To the extent feasible, the school district will maximize the quantity of outside air for buildings with mechanical or natural ventilation systems by:

- For indoor locations, the District will evaluate how to maximize the quantity of outdoor air and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.
- If the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke, outside air vents and windows will be closed.
- For buildings with mechanical or natural ventilation, or both, the District 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, for instance from excessive heat or cold.
- The HVAC system will be properly maintained and adjusted by the District Maintenance staff and HVAC Technician(s).
- The highest MERV filters will be utilized to insure adequate air filtration.
- Employees are encouraged to open windows or doors with outside conditions are favorable.

Cleaning and disinfecting

The following cleaning and disinfection measures for frequently touched surfaces will be implemented:

- The Superintendent will ensure that adequate supplies and adequate time for disinfection/cleaning to be done properly.
- The Superintendent will direct the custodians in the frequency and scope of cleaning and disinfection.]

When a COVID-19 case is identified at a school site or workplace, the following procedures will be implemented:

PPE will be worn by employees performing disinfection tasks.

- Disposable gloves- Ex: Latex or Nitrile

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- Mask- Ex: Disposable face mask
- Eye covering- Ex: Safety glasses, Safety goggles, Face shield

Procedures

- Clean the surface first, and then disinfect.
- Body fluids must be thoroughly cleaned from surfaces/objects. Use soap and water to clean first.
- Apply the district approved disinfection product. The employees should review the SDS for the chemical to be used and follow all label directions.
- The surface must stay wet with for 10 minutes, or for the appropriate dwell time listed on the product. If the surface dries before the 10 minutes (or, label listed dwell time), reapply
- Dispose into the trash any paper towels, gloves, and other materials that came in contact with the surfaces during the cleaning and disinfection process.

Shared tools, equipment and personal protective equipment (PPE)

- PPE must not be shared, e.g., gloves, goggles and face shields.
- Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible.
- Where there must be sharing, the items will be disinfected between uses by the affected employee with the District approved disinfecting product.

Hand sanitizing

- To protect employees from COVID-19 hazards, the District will evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. Employers shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.
- Wash hands frequently with soap and water for a minimum of 20 seconds. If soap and water are not available, use hand sanitizer (70% alcohol content or greater). At a minimum, employees **MUST** wash hands at the beginning and end of each shift, after using the toilet, before and after each break.
- Encourage respiratory etiquette, including covering mouth and or nose when coughing and/or sneezing. Cover the mouth and nose with a tissue. If a tissue is not immediately available cough or sneeze into your sleeve, not your hands.
- Avoid touching your eyes, nose, and mouth especially with unwashed hands.

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

PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, will be provided, as needed.

The School District will evaluate the tasks or conditions in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained for the need to utilize N95 or other tight-fitting respirators. A Respiratory Protection Program will be implemented that includes Medical Evaluations, Fit-Testing, and Training.

The School District will provide and ensure use of eye protection and respiratory protection in accordance with CCR Title 8 section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

Investigating and Responding to COVID-19 Cases

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

Response to a COVID-19 case in the workplace:

The District will take all of the following steps in response to a COVID-19 case in the workplace.

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1. Determine the day and time the COVID-19 case was last present 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.
2. Determine who may have had a COVID-19 exposure. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the high-risk exposure period.
3. Give notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
 - a. All employees who may have had COVID-19 exposure and their authorized representatives.
 - b. Independent contractors and other employers present at the workplace during the high-risk exposure period.
4. 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 the COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This may include any benefits available under workers' compensation law, the 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, the employer's own leave policies, and leave guaranteed by contract.
5. 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.
6. All personally identifying information regarding COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by the employer under this section and sections 3205.1 through 3205.4 shall be provided in a manner that ensures the confidentiality of employees.

System for Communicating

The School District goal is to ensure that effective two-way communication with employees, is performed and includes the following information:

- Employees should report COVID-19 symptoms and possible hazards to the office personnel.
- Employees can report symptoms and hazards without fear of reprisal.
- School District procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- To give employees the tools to get tested when they have symptoms to reduce the likelihood of bringing the virus to work, employees may access COVID-19 voluntary testing available through health plans or local testing centers.
- In the event testing is required to be provided because of a workplace exposure or outbreak, the School District will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Information about COVID-19 hazards employees (including other employers and individuals in contact with the workplace) may be exposed to, what is being done to control those hazards, and the School District's COVID-19 policies and procedures.

Training and Instruction

The School District will provide effective training and instruction that includes:

- 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

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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.
- Training will be documented by a completed Training Verification Form provided during the training. Alternatively, a training log may be utilized.

Exclusion of COVID-19 Cases

When a COVID-19 case is identified in the workplace, the School District will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until 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 or as dictated by Public Health.
- 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.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

The School District's CPP Officer will:

- Report information about COVID-19 cases 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 the place of employment or in connection with any employment.
- Maintain records of the steps taken to implement the written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make the written COVID-19 Prevention Plan (CPP) 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 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.

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COVID-19 cases who tested positive but never developed COVID-19 symptoms

Shall 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 shall 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 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, as dictated by Public Health.

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 Appendix B: COVID-19 Inspections**

Work location evaluated: _____

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

Date: _____

Name of person conducting the inspection: _____

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 Appendix C: Investigating COVID-19 Cases**

Date: _____ **Name of person conducting the investigation:** _____

1. All personal identifying information of COVID-19 cases or symptoms will be kept confidential.
2. All COVID-19 testing or related medical services provided 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.
3. All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

Employee (or non-employee*) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or non-employee was present)		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			
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:	

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Multiple COVID-19 Infections and COVID-19 Outbreaks

If a school site workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period, this section of CPP will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

COVID-19 testing

- The School District will follow COVID-19 testing guidelines as dictated by Public Health.
- The School District will provide COVID-19 testing to all employees in the School District 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 the 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, the School District 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 the workplace for a 14-day period.
 - The School District will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

The School District will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with the 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

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

COVID-19 investigation, review and hazard correction

In addition to the CPP Identification and Evaluation of COVID-19 Hazards and Correction of COVID-19 Hazards, the School District 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:
 - Leave policies and practices and whether employees are discouraged from remaining home when sick.
 - 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. The following will be considered:

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- 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.

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in the workplace, the CCP Officer will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- The CPP Officer 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. The CPP Officer will continue to give notice to the local health department of any subsequent COVID-19 cases at the workplace.

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Major COVID-19 Outbreak

If a school site or School District workplace experiences 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 the workplace for a 14-day period.

COVID-19 testing

The School District will 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 will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illnesses

The School District will comply with the requirements of the CPP Investigating and Responding to COVID-19 Cases.

COVID-19 hazard correction

In addition to the requirements of the CPP Correction of COVID-19 Hazards, the School District will take the following actions:

- In buildings or structures with mechanical ventilation, the School District 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, the School District will use filters with the highest compatible filtering efficiency. The School District 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.
- The School District 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.
- The School District will 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 Cal/OSHA.

Notifications to the local health department

The School District will comply with the requirements of any Multiple COVID-19 Infections and COVID-19 Outbreaks-Notifications to the Local Health Department.