

AACA COVID19 Prevention Program – CCP

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

Date: rev. January 26, 2021

Authority and Responsibility

AACA COVID-19 Response Team has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

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

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Emailing, or speaking directly with a member of the COVID-19 Response Team**

Employee screening

We screen our employees by: **Designated Screeners approach AACA in their vehicles upon arrival for an active screening. Employees have their temperature taken, answer a covid19 screening questionnaire, and are asked to comply with PPE requirements prior to entering the building. If the employee fails any portion of the screening, they are respectfully asked to return home to seek medical assistance to obtain a medical clearance from an MD to return to work.**

Correction of COVID-19 Hazards

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

The severity of the hazard will be assessed, and correction time frames assigned, accordingly.

Individuals from the AACA Covid19 Response team are identified as being responsible for timely correction or any hazards or issues. They will follow up daily to ensure effectiveness of the correction.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we always ensure at least six feet of physical distancing in our workplace by:

- Eliminating the need for workers to be in the workplace – e.g., 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
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.
- Reference section 3205(c)(6) for details]

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

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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. **AACA provides both cloth and paper face coverings to all employees and visitors. AACA also provides face shields to its employees as an additional measure of safety. AACA Covid19 response team has trained and instructed employees in the proper wearing of face masks and requires employees to wash their masks daily to maintain good health. The AACA Covid19 response team walks the campus periodically throughout the day to insure employee compliance with mask wearing and social distancing.**

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- 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

We implement the following measures for situations where we cannot maintain at least six feet between individuals: e.g., during clinical treatment where para-professional hands-on support is needed.

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

Leaving doors and windows open, utilizing HEPA filters, and using an HVAC system designed for our facility.

- The HVAC system will be used during circumstances where the amount of outside air needs to be minimized due to other hazards, such as heat and wildfire smoke.
- While AACA does not own the building, it is responsible for the maintenance of the HVAC system and relies on the HVAC company to keep us on a maintenance schedule to keep the system operating an maximum efficiency and as clean as possible.

Cleaning and disinfecting

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

AACA also employs a cleaning team to do a deep manual cleaning at the end of each day and a fogging of the entire campus each evening to ensure a completely sanitized environment for the following day.

- AACA also purchases cleaning supplies which are approved by the CDC and EPA for the purposes of cleaning and disinfecting throughout the workday. Our COVID19 response team takes a weekly inventory and orders new supplies as needed. Additionally, staff can put in a purchase request for any items they think might improve their ability to comply with OSHA/DPH guidelines and if the items is approved, AACA will procure it.
- AACA has posted a copy of its COVID19 policies and procedures in the workplace in all its building so that employees may refer to it at any time. Common areas are cleaned and sanitized 3 times per 6 hour shifts and classrooms are cleaned hourly.

Should we have a COVID-19 case in our workplace, we will implement the following procedures: Should AACA become aware of a confirmed COVID19 case, the cohort is immediately closed for 2 weeks and the classroom is deep cleaned and sanitized by a professional cleaning team. If there is a confirmed COVID19 case of a member of management, their individual office is closed for 2 weeks, deep cleaned and sanitized. The common areas of the office continue to be cleaned and sanitized per the daily schedule and deep cleaned at night.

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 assigned members of the COVID19 response team who will disinfect shared items such as printer touch screen, doorknobs, faucets, etc. according to the posted cleaning schedule at least 3 times per 6 hours)

Hand sanitizing

To implement effective hand sanitizing procedures, we:

- AACA has soap dispensers, sanitizer dispensers, and air dryers in all its lavatories.
- We have conducted hygiene trainings and encourage employees to wash their hands hourly.
- All employees have an EPA/CDC approved bottle of hand sanitizer at their desk and AACA keeps a good supply on hand. There are mounted hand sanitizer dispensers posted outside all offices, classrooms, and main doors to the buildings.
- We have posted pictures of proper hand washing technique to ensure employee compliance.

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

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

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. AACA has N95 masks on site for use in a clinical setting. AACA also provides face shields to its employees.

We provide and ensure use of eye protection and respiratory protection in accordance with 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 form.

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

- Offered COVID-19 testing at no cost during their working hours.
- The 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:

- If an employee suspects that they have COVID19 symptoms or have been exposed to someone who has, they have been trained to reach out to a member of the COVID Response team. They will be offered repeated testing at no cost to them and asked to remain home to quarantine in accordance with the CDC guidelines.
- AACA guarantees 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, are to offer them the ability to work remotely, or sequestered from other people during their assigned shift (whichever is preferable to them)
- AACA offers free weekly PCR testing to all its employees.
- 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. We do this using a broadcast message system through our employee portal. We arrange drive through testing to minimize the risk of transmitting the virus. We toggle our business or cohort back to a virtual platform for 2 weeks. We report a cluster (3 or more positive tests) to the DPHS. We report any positive test to the DPHS and identify all possible contactees during the 10 days prior so that we can make the appropriate decision as to complete closure versus a partial closure.
- AACA Covid19 Response Team stays informed of all changing rules, regulations, and new information regarding COVID19 and its transmissibility. We consistently pump out new information to our staff as soon as we become aware of it. These updates are sent to them directly and added to our posted workplace material.

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:
 - o COVID-19 is an infectious disease that can be spread through the air.
 - o COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - o 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

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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.

AACA Keeps a training roster for all its employee trainings. Employees are required to sign as having received the trainings.

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 **following LADPHS guidelines in reporting and tracing contact exposure for the 10 days prior to the last known time a positive employee was on campus. If there have been no known cases on campus, then AACA COVID19 response team will ask the employee where he/she may have come into contact with someone who might be positive.**
- 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:
 - o At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - o COVID-19 symptoms have improved.
 - o 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.

[Type Title of owner or top management representative formally approving the program and have them sign and date]

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:

Date:

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

Observance of or Interaction, area, activity, work task, process, equipment, and material that potentially exposes employees to COVID-19 hazards	Date, Places, and times	Potential for COVID-19 exposures and employees affected, including visitors and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions, and ventilation

COVID 19 Inspections

Date:

Name of person conducting the inspection:

Work location evaluated:

Exposure Controls	Status- e.g. Defective, out of stock	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 (does not appear to be soiled or old)			
Gloves			
Face shields/goggles			
Respiratory protection			
Gowns as Needed			

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 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.

Date:

Name of person conducting the investigation:

COVID-19 Case Investigation Information			
Employee (or visitor's) name:		Occupation (if non-employee, why they were in the workplace):	
Location where employee worked (or visitor was present in the workplace):		Date investigation was initiated:	
Was COVID-19 test offered?		Name(s) of staff involved in the administration of same:	
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 (as it relates to more than 1 case):		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	Date:		
	Names of employees that were notified:		
Independent contractors, visitors, and staff 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



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COVID-19 Training Roster Example (All new and returning AACA staff must complete a covid19 training)

Date:

Person that conducted the training:

Employee Name	Signature

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 10-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - All employees in our exposed workplace will be immediately tested and then tested again 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.
 - Increasing frequency of sanitization schedule
 - Remaining/switching to a virtual working model

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

This section 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:

- We will 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.

should be used in accordance with state or local health officer orders or guidance.

Cleaning and disinfection

We will ensure that:

- Classrooms, Offices, , kitchens, bathrooms, and common areas are effectively cleaned and disinfected at least once a day to prevent the spread of COVID-19. Cleaning and disinfecting shall be done in a manner that protects the privacy of staff and students.
- Unwashed dishes, drinking glasses, cups, eating utensils, and similar items are not shared. AACA provides paper and plastic utensils to eliminate sharing.

Screening

We will encourage staff, visitors, students, and their families to report COVID-19 symptoms to AACA COVID19 Response Team and/or to the applicable local health department.

COVID-19 testing

We will establish, implement, and maintain effective policies and procedures for COVID-19 testing staff and students who had a COVID-19 exposure, who have COVID-19 symptoms, or as recommended by the local health department.

Isolation of COVID-19 cases and persons with COVID-19 exposure

We will:

- Effectively isolate COVID-19 exposed students from all other persons except for their assigned Para-educator
- AACA shall maintain a dedicated isolations space where a symptomatic student can wait for parent pick up and be monitored.
- AACA shall offer a potentially exposed para-educator discharged with supervising a symptomatic student a sterile gown and gloves for additional protection