

COVID-19 Prevention Program



Employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). The following Cal/OSHA template has been used to develop the Citizens of the World Charter Schools - Los Angeles' ("Charter") plan. The Charter considered and incorporated Los Angeles Unified School District's CPP, as it is required.

Additional support documents and information specific to the Charter's COVID-19 Prevention Program are available upon request.

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COVID-19 Prevention Program

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COVID-19 PREVENTION PROGRAM

This COVID-19 Prevention Program ("CPP") is designed to control exposures to the SARS-CoV-2 virus that may occur in the workplace at Citizens of the World Charter Schools - Los Angeles ("Charter").

Authority and Responsibility

Mark Kleger Heine, Executive Director, and Dave Tassone, Director of Talent have the 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 (Los Angeles County Department of Public Health) related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by participating in safety meetings at both the regional and school-site level and being vigilant about identifying potential hazards and reporting them via email to their supervisor and the Charter's Talent/HR Team at talent-hr@cwcclosangeles.org.

Staff Education

The Charter is committed to train employees and provide educational materials, protocols and resources for employees in the following health and safety actions:

- Proper usage and care of face coverings
- Safe practices for the use of Personal Protective Equipment (PPE)
- Physical distancing guidelines
- Hand hygiene protocols
- Cleaning and disinfecting protocols
- COVID-19 specific symptom identification
- Information regarding COVID-19 leaves for staff (contact Talent/HR Team)

Correction of COVID-19 Hazards

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

- In the event that an inspection reveals any potential COVID-19 hazards:
 - The severity of the hazard will be assessed and correction time frames assigned.
 - Individuals will be identified as being responsible for timely correction.
 - Combinations of controls will be used from the hierarchy of controls used to limit the spread of COVID-19 in **Appendix C: Controls Table**.
 - Follow up measures and corrective actions to remediate any potential COVID-19 hazards will be taken including developing additional policies and practices related to health and safety, physical distancing, cleaning and disinfection, and any other action necessary to reduce the spread of COVID-19.
- When engineering and administrative controls are not fully protective:
 - Charter will determine what PPE is needed for each employees' specific job duties, consistent with CCR Title 8, section 2280.
 - Charter will select and provide appropriate PPE to staff at no cost.
 - Charter will train workers on its correct use.

Control of COVID-19 Hazards

Physical Distancing

Where possible and reasonable, we will alter workspaces to help staff and students maintain physical distancing and physically separate employees from each other and from students, such as:

- Adjusting school practices to reduce close contact with and among students and any other in-person interactions on the Charter campus - for example, by using larger formal spaces (e.g., auditoriums) or outdoor areas for instruction.
- Individuals maintain a distance as recommended by local, state and federal health authorities.
 - In this situation, the Charter will evaluate the need for additional eye protection and respiratory protection, consistent with CCR Title 8, section 5144. Implementing flexible worksites (e.g., telework).

- Implementing flexible work hours (e.g., rotate or stagger shifts to limit the number of employees in the workplace at the same time).
- Increasing physical space between employees at the worksite by modifying the workspace.
- Increasing physical space between employees and students (e.g., physical barriers such as partitions) when necessary.
- Using signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.
- Implementing flexible meeting and travel options (e.g., postpone non-essential meetings or events in accordance with state and local regulations and guidance).

Classroom/Instructional/Academic Learning Spaces

- Staff shall make every reasonable effort to create physical distance when doing so will not interfere with the full time attendance of all enrolled students.
- The Charter shall ensure a minimum physical distance as recommended by local, state and federal health authorities.
- The Charter will implement measures to reduce crowding as students and parents enter and move through the school building.
- The Charter shall calculate the maximum capacity of all workspaces while maintaining physical distancing requirements prior to the start of in-person learning. This capacity will include the teacher, assigned support staff and students.
- The Charter will implement measures that allow for recommended physical distancing within classrooms when possible without interfering with essential operations.
- The Charter will adopt a school-wide approach to attempt to create and maintain stable groups in which adults and children stay together for as many activities as possible and avoid intermingling with people outside their group in the setting throughout the school day.
- The Charter will implement measures to increase physical distancing during school meals when students will be unmasked including eating outdoors in their stable group, maintaining physical distancing and/or use of barriers between students.
- Schools will offer a limited number of Independent Study seats for families not ready to return.
- While indoors, students will be physically distanced as recommended by local, state and federal health authorities.
- Desks and/or workstations will face in the same direction as feasible.

Bathrooms

The Charter will endeavor to create physical distancing in communal bathrooms to the degree feasible. The Charter's bathroom protocols will be implemented at the Charter's private sites and coordinated with LAUSD for co-located sites. Signs or physical barriers may be placed on alternating bathroom stalls or sinks.

Entrance, Egress, and Movement Within the School

Movement of students, staff, and parents may be managed to avoid close contact and/or mixing of cohorts to the degree feasible.

Arrival Procedures

- Gates will open at a designated time.
- One-way directions/movements will be established in high potential traffic areas.

Dismissal Procedures

- At the end of the day, students will be dismissed in cohorts to be picked up by a parent/guardian. Students will be released on a staggered schedule.
- One-way directions/movement will be established in high potential traffic areas.

Main Office Procedures

- Office hours will have a designated start and end time.
- To ensure physical distancing, we ask that no more than one visitor enter the office at any time.
- Masks are strongly recommended for all visitors.
- Offices will have designated areas for visitors. We ask that all visitors remain within the designated areas.
- Deliveries to classrooms will not be permitted during the school day. This includes but is not limited to forgotten books/assignments, birthday treats, lunches, etc.

Visitors on Campus

- Visitors and volunteers will be allowed on campus in accordance with CWC and LAUSD's visitor and volunteer protocols, and visitors and volunteers must comply with all required COVID-19 safety protocols.

Face Coverings

We provide clean, undamaged face coverings for staff and students and ensure they are properly worn over the nose and mouth if required by orders from CDPH and LACDPH.

Face coverings should be properly worn by all individuals on a school campus when required. The Charter shall develop and share with staff a plan to redirect and instruct students and others who are not in compliance with the face covering requirements. A staff member or student with a medical condition who cannot wear a mask when required will be addressed on a case-by-case basis.

- Students at all grade levels and staff are strongly recommended to wear masks in accordance with LA County, LAUSD, and CWC protocols. Masks should be surgical grade masks (also referred to as medical procedure masks) or higher-level PPE (e.g.

KN95 or N95 respirator masks).

- Staff and families will be trained on the correct use of masks. If a face mask appears soiled, damaged or visibly contaminated, it will be replaced immediately by using the face mask inventory at the school.
- For 10 days after a positive test, students and staff are required to wear an upgraded mask indoors & outdoors at all times outside of eating and drinking.
- For 10 days after an exposure to a positive case, staff are required to wear an upgraded mask indoors & outdoors at all times outside of eating and drinking. Students are strongly recommended to mask.

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

- When an employee is alone in a room or when working alone in a larger open workspace.
- While actively eating and drinking at the workplace, provided employees are implementing physical distancing 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, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis. Employees who are exempt from face coverings will develop a more frequent testing protocol with the Charter.
 - Any employee who is unable to wear a face covering (face shield with a drape or other effective alternative, or respiratory protection) shall use all other measures to protect against COVID-19 infection as outlined in this CPP.

Engineering Controls

The Charter operates schools on both private sites and co-located sites within the Los Angeles Unified School District ("LAUSD"). Site-specific measures will be taken by the Charter on private sites where the Charter has full authority to make adjustments to engineering controls, and the Charter will work closely with LAUSD to ensure appropriate measures are taken on sites co-located on district property in compliance with CDPH and LACDPH guidelines.

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

Air Ventilation and Filtration

Public health officials indicate that proper ventilation is necessary to minimize the transmission and infection from COVID-19, especially for individuals in a closed space for extended periods of time by reducing the airborne concentration of the virus and thus the risk of transmission and infection of COVID-19 through the air. All locations with

functioning windows shall be encouraged to keep them open depending on weather, temperature, or air quality conditions.

The Charter shall operate all HVAC systems on the mode which delivers the freshest air changes per hour, including disabling demand-controlled ventilation, and opening outdoor air dampers to 100% as indoor and outdoor conditions safely permit. The Charter will regularly change air filters. Classrooms will be equipped with air purifier systems.

Healthy Hygiene Practices

- The Charter aims to ensure adequate supplies are available to support healthy hygiene behaviors. School sites will have the following available:
 - ❖ Soap
 - ❖ Tissues
 - ❖ Face coverings (student and staff)
 - ❖ Face shields (student and staff)
 - ❖ Hand sanitizer
 - ❖ EPA-approved cleaning supplies
 - ❖ Plexiglass dividers
- Hand sanitizing stations will be installed in high traffic areas, and hand sanitizer dispensers will be available at all classroom points of entry. Students will be required to regularly sanitize hands.
- Soap dispensers will be in all staff and student restrooms; students and staff will be encouraged to wash hands frequently.

Cleaning and Disinfecting

We will directly implement on our private sites and partner with LAUSD on our co-located sites to ensure the following cleaning and disinfection measures for frequently touched surfaces:

- Cleaning schedules, training, and adequate supplies will be provided to all custodial staff.
- Regular monitoring will take place at the school sites to ensure that both the frequency and scope of cleaning and disinfection is taking place.

We will be using cleaning products approved for use against COVID-19 by the Environmental Protection Agency ("EPA").

- Use of cleaning products approved for use against COVID-19 on the Environmental Protection Agency (EPA) approved list "N" and following of product instructions
- Third-party custodial employees who are responsible for cleaning and disinfecting school sites will be equipped with proper protective equipment including gloves, eye protection, respiratory protection and other appropriate protective equipment

The Charter has plans in place to maximize custodial staff and are implementing daily

schedules for practicable cleaning and disinfecting at school sites.

- All classroom spaces, restrooms, common spaces, offices and other used facilities at the school site will be cleaned and disinfected regularly per CDC guidelines, including but not limited to desks, doorknobs, light switches, faucets, and other high touch fixtures, using the safest and most effective disinfectant necessary, as recommended by federal, state, and/or local health officials.
- All bathrooms will be serviced regularly. Full cleaning and disinfecting using electrostatic equipment will be conducted by the night cleaning crew between cohorts.
- Cleaning schedules will ensure cleaning/sanitization is occurring regularly throughout the day. Cleaning and disinfecting guidelines will be established to ensure safe and correct application of disinfectant by trained custodial staff and to keep products away from children's reach (stored in a space with restricted access).
- All classrooms have hand sanitizer dispensers by the entry door and other locations in the classroom.
- Cleaning and sanitation supplies will be made available in the event a teacher desires to perform additional classroom cleaning/sanitization.

Should we have a COVID-19 case in our workplace, those areas trafficked by infected students or staff, and all associated furnishings and equipment, will be thoroughly cleaned and disinfected with our outside custodial service provider as per CDC guidance.

Shared Tools, Equipment and Personal Protective Equipment (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Sharing of objects and equipment, such as toys, games and art supplies will be limited to the extent practicable. Items will be cleaned and disinfected between uses as practicable. Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools should not be shared, to the extent feasible.

Hand Sanitizing

The Charter is committed to teaching, reinforcing, and developing regular hand washing routines throughout campuses. Education will include best practices on avoiding contact with one's eyes, nose, and mouth, as well as washing or sanitizing hands before and after eating, using the restroom, being outside, and coughing or sneezing. Time will be set aside for teachers to develop a regular schedule for routine hand hygiene.

Additional hand sanitizing dispensers are available in all classrooms and additional supplies are available for school sites.

- Hand sanitizing dispensers will be available in all classroom points of entry.
- Soap dispensers are in all staff and student restrooms; students and staff will be encouraged to wash hands frequently.
- Employees and students are encouraged to wash their hands for at least 20 seconds each time.
- Every classroom and common space shall be provided with hand sanitizer with alcohol levels and types selected by the Charter based on the recommendation of the CDC, CDPH and LACDPH.

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 and shall provide and ensure use of respirators in accordance with section 5144 when deemed necessary by the Division through the Issuance of Order to Take Special Action.

Personal Protective Equipment – this refers to equipment that is used to limit or prohibit the transmission or infection of COVID-19 from person to person. It includes face coverings, masks, face shields, barriers, gloves, etc.

- The Charter shall provide PPE to all staff members and students, if needed, for every day that staff members or students are required to report to school sites.
- In-lieu of using Charter-provided PPE, staff members and students may bring their own PPE so long as the PPE complies with public health guidelines and provides equivalent protection to the PPE provided by the Charter.

Material Sharing

Protocols have been developed to minimize the need to have multiple students sharing high touch materials to the greatest extent possible. These materials include, but are not limited to books, computers, calculators, writing utensils, computer keyboards/headphones, hall passes, art supplies, and learning aids. Single-use disposable materials are encouraged when feasible. Each school will try to supply each student with their own materials when feasible. If a student is assigned a specific cubby or locker to store his or her personal belongings, it should only be accessed while socially distant and within their primary cohort. Cubbies and lockers may not be shared.

Signs, Messaging and Training Protocols

Signs and messages explaining protocols and expectations to stop the spread of disease will be posted throughout our schools. These signs are age-appropriate and in languages representative of our community. Staff members will all be provided with

Personal Protective Equipment (PPE) supplies and will have in-service training for ensuring health and safety in the workplace.

- Signs will be posted in highly visible locations, such as school entrances and restrooms that describe how to stop the spread of germs (i.e. handwashing, face masks).
- Regular announcements will be made on reducing the spread of COVID-19 through the school's PA system or parent newsletters.
- When communicating with families (school website, social media) messages will include health hygiene, mask wearing and social distancing habits to stop the spread of COVID-19.
- Signs and messages related to disease transmission will be accessible for students with disabilities and in languages appropriate for the school population.
- School reopening safety signage from LAUSD Reprographics is available for schools at <https://www.lausdrepro.net/category/SchoolReopeningCOVID19Items>.
- Staff members will attend mandatory training on health and safety protocols before in person instruction begins. All staff members, including substitutes, who are hired after this date will be required to complete training before their first day of work. Topics covered in the training will include physical distancing, cleaning protocols, office visits and hygiene practices. Additional video training may be provided to students and families so they can practice before the start of school. In-person student instruction on new school protocols will include topics regarding expectations in health and safety practices.

Cohort Groups (Daily Operations)

According to the CDC, cohorting may help prevent the spread of COVID-19 by:

- decreasing opportunities for exposure or transmission of SARS-CoV-2,
- reducing contact with shared surfaces,
- facilitating more efficient contact tracing in the event of a positive case, and allowing for targeted testing, quarantine, and/or isolation of a single cohort instead of school-wide measures in the event of a positive case or cluster of cases.

Implementation of this strategy can vary, depending on the setting and resources.

Cohorts are small groups of students and staff that are as stable as possible (i.e.,

keeping the group together as much as possible without mixing with any other groups) and that vary in size. Where possible, students can stay together in their respective classrooms throughout the day to reduce exposure that might occur during period switches and hallway passing, and/or classroom groups may move together in staggered passing schedules to other rooms they need to use. Different cohorts may exist outside of the school day, such as in before or after school programs. Each cohort will be maintained in a supervised environment in which supervising adults and children stay together for activities (such as meals, recreation, etc.) and avoid contact with people outside of their group.

Students who are part of a cohort may leave the cohort to receive specialized services in other locations on campus and grouped with other students requiring similar services as needed to provide appropriate level of instruction or care. Specialized services may include but are not limited to occupational therapy, speech and language services, behavioral services, intervention, and/or assessments.

Specialized staff who serve students with IEPs or 504 plans and/or provide specialized services will need to work with different stable groups during the day and this will be accommodated. Staff that are not fully vaccinated should consider wearing goggles and a face shield in addition to the required mask if entering multiple classrooms for this purpose. All staff will be encouraged to wash/sanitize hands after leaving a classroom and entering another.

Pre-K - Grade 5: The primary cohort group for students Pre-K through Grade 5 is their classroom. Class groups will be as consistent as feasible, with the same class group remaining with the same staff for the day when practical. Mixing of groups will be limited to the greatest extent possible. Students will remain in their cohort group in their classrooms, as well as during Physical Education, Library, Art, Music, lunch and recess.

Communal Spaces: Communal spaces such as cafeterias, playgrounds, auditoriums, and libraries will be assessed to allow for physical distancing between cohorts.

Elevator capacity will be limited to the number of people that can be accommodated while maintaining 6-foot distance between riders.

Outside Organizations: Use of the school facilities by outside organizations will not be permitted and will be limited in all ways possible. However, in some cases, outside organizations will be necessary to provide critical services to children (e.g., for providing special education services). In these instances, outside organizations will be required to follow all of the safety protocols required of all Charter staff.

Visitors: Visits to the school by individuals other than students and staff shall be minimized whenever feasible. Approved visitors are required to follow all COVID-19 safety protocols as outlined by LA County, LAUSD, and CWC LA. Parents of enrolled

students are encouraged to conduct business with school personnel remotely. All visitors must check-in and provide their name and contact information, so that they can be contacted if there is an exposure during their visit. Visitors will be encouraged to come by appointment and alone. If a visitor must be accompanied by another person (e.g. for translation, visitor is a minor or has minor students), then their information needs to be captured in the visitor log as well.

Movement of visitors within the school may be limited to designated areas such as the main office, conference rooms, lobby and public restroom. Visitors are not permitted to interact with any cohorts unless they are part of an outside organization providing a critical service to students, as described above. All visitors are strongly recommended to wear a face mask upon entering a CWC campus. This applies to all adults and to children 2 years of age or older. Any parent/guardian picking up a student who has been placed in isolation or quarantine, must stay outside campus and the student will be brought to them for dismissal.

COVID-19 Health, Symptoms and Exposure Screening

All employees and students (or their parents or guardians) may be asked to perform a self-assessment prior to leaving for school or on campus to identify fever or other COVID-19 symptoms. If the answer to the question, "Do you agree to the statements below" is NO, employees and students must remain home and notify the school of the absence.

Adult visitors and staff who report symptoms at any point during the school day are instructed to return home, self-isolate and keep away from others until further instructions are given by the school or COVID-19 Compliance Officer.

Students who have a temperature of 100.4° F and above or who experience symptoms at any point during the school day will be given a mask and accompanied to the designated isolation area where they can remain while arrangements are made for their return home. The school COVID-19 Compliance Officer is informed of any positive screening results in school and will then coordinate response with the COVID Response team. Screening questions may change, based on updates from the LA County Department of Public Health.

How are you feeling this morning?
If student says "great" or "fine" then allow entry (temperature check optional)
If the student doesn't directly answer the question, you can ask them "Health-wise, how are you feeling this morning?"

If student looks ill or says “ok,” “not well” or anything similar then ask:

Have you had any of the following symptoms in the last 14 days?

- Fever of 100.4° or greater
- Chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea
- Vomiting
- Diarrhea

If the student has any of these symptoms, they must move to the isolation area and be picked up immediately.

COVID-19 Testing Process

CWC has shifted from weekly testing to response testing in accordance with LAUSD and the Los Angeles Department of Public Health. Only those who are experiencing COVID-19 symptoms, or who have been in close contact with a person who has tested positive, will be required to test. All testing will be conducted with take-home rapid antigen tests, which are available for students and employees at each school site.

If an employee or student becomes symptomatic or tests positive, the employee or student who may have been exposed are given instructions to isolate according to the Charter's protocols.

Baseline testing is conducted to inform a safe re-opening of in-person instruction. Staff and students are required to participate in CWC's COVID-19 testing program and receive a negative result prior to entering a CWC site. Within the 7 days prior to accessing an LAUSD campus, all CWC students and staff who will be returning to the school campus will be provided with a back-to-school baseline test and can only access the campus following a negative result. Prior to commencing instruction, all CWC students and staff at private sites will also receive a baseline test and cannot commence instruction without a negative test. Students who participate in Independent Study are not required to participate in this testing program.

Additionally, if an outbreak occurs within a cohort, cohort members may be required to quarantine to limit the spread of the virus, based on the latest requirements from LA County public health officials, LAUSD, and CWC.

Students with Disabilities

Individuals with Disabilities Education Act /Americans with Disabilities Act

CWC is prepared for opening and to provide FAPE in the least restrictive environment (LRE) for each child, where possible. All students with disabilities will receive services according to their IEP. In accordance with IDEA it is critical to reinforce the understanding that students receiving special education services, or 504 accommodations, are general education students first. Balancing the educational needs with the health and well-being of students and staff is our top priority. Every child and adolescent with a disability is entitled to FAPE, and is entitled to special education services based on their individualized education program (IEP). It will require ongoing review and problem solving to balance safety and service needs. In order to provide the required level of safety, systems, processes and service, delivery models have been, and will continue to be, reviewed. Adherence to physical distancing guidelines will be followed as feasible except for instances when the services outlined in a specific IEP call for closer proximity. This will be evaluated on a case-by-case basis. For example, additional provision of PPE supplies to staff (gloves, face shields and Plexiglas dividers) who are required to deliver hand-over-hand instruction or hygiene services to students.

Timelines and Evaluations

All IDEA/ADA compliance timelines will be followed on schedule and in accordance with IDEA/ADA regulations. IEP Team meetings and 504 meetings that were missed due to school facility closures will be rescheduled and conducted as soon as possible, if not already conducted. All IEP team meetings and 504 meetings will be conducted virtually until allowed by public health guidelines.

Service Provision

Students attending in-person instruction, and students who opt for continued distance learning, will receive services as outlined in their IEP.

- For students attending in-person instruction, where possible, each student will be included into the Least Restrictive Environment. Special education teachers supporting students in the general education setting will provide services either remotely, or in person, or on a one to one in-person basis via a pull-out service delivery model. The chosen model of service delivery will be selected by the school site in consideration of all safety measures.
- Related service providers will provide services to students remotely via distance learning platforms, or on a one to one in-person basis as appropriate. The chosen model of service delivery will be selected by the school site in consideration of all safety measures.
- Students from different cohorts may be able to be grouped together for pull-out services in accordance with state and local guidelines.

- The IDEA allows for flexibility in determining how to meet the individualized needs of students receiving special education services. State guidelines for the delivery of special education and related services will be implemented while protecting the health and safety of students as well as the individuals providing the services.
- In the event that the Department of Public Health requires the level of mitigation that would require the Charter to return to a full Distance Learning Model, each student will have an Individualized Distance Learning Plan reinstated that is in accordance with the IEP. FAPE will continue to be provided.
- CWC will provide appropriate protective equipment relative to the responsibilities of all Support Service Staff and student specific disability needs.
- If a student receiving special education services is unable to wear a face covering when it is required, the student must apply for a mask exemption and that exemption must be approved by the school site. Mask exemptions are rare yet may include:
 - Those with a medical condition, mental health condition, or disability that prevents wearing a face covering. This includes persons with a medical condition for whom wearing a face covering could obstruct breathing or who are unconscious, incapacitated, or otherwise unable to remove a face covering without assistance. Such conditions are rare.
 - Those who are hearing impaired, or communicating with a person who is hearing impaired, where the ability to see the mouth is essential for communication. Those with communication disabilities or caregivers of those with communication disabilities can consider wearing a clear mask or cloth mask with a clear panel when appropriate.
 - Those exempted from wearing a face covering due to a medical condition must wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it. Students who cannot wear a mask should not be placed with a cohort or group of students in the classroom. They may be able to tolerate a face shield with drape at the bottom which does not provide the same extent of source control or personal protection as use of a properly fitted, multi-layered face mask, therefore a student who cannot wear a mask can receive necessary services in a one-to-one setting with staff wearing appropriate PPE. They may also need to be accommodated via Independent Study.
- Staff will be supplied with protective equipment as appropriate, including masks, shields, gloves and/or goggles.
- All Staff and students will receive training on the appropriate use of PPE and healthy hygiene practices that are proven to mitigate the spread of COVID-19.

504 Accommodations

The 504 Plan is developed to ensure that a child who has a disability identified under ADA receives appropriate accommodations that provides equitable access to the learning environment. All accommodations within the 504 Plan will be followed, where possible. The team may need to provide other accommodations to meet specific criteria under the reopening school plan. Case managers will review 504 Plans to make sure that students receiving accommodations have equitable access to their education under the reopening plan. When required a 504 meeting will be held to provide appropriate added accommodations.

Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix D: Investigating COVID-19 Cases** form as well as the **Appendix E: CWC COVID-19 Standard Operating Procedure (SOP): Exposure Management Plan (EMP)**.

Students or staff who are present with symptoms while at school:

- Students will go to a designated isolation area until they can be picked up by a parent or guardian.
- Staff must leave campus/facility and inform their supervisor prior to leaving.
- Per State guidelines, the Charter should recommend the individual experiencing symptoms take a COVID-19 test.
- If a student or staff member tests negative, they may return to school after 24 hours of being fever-free without fever-reducing medication and symptoms having improved.

Students or staff who have had **close contact** with a confirmed COVID-19 case:

- Under guidance from the [LA County Department of Public Health](#), if an individual is a close contact to someone with COVID-19, they are not required to quarantine if they have no symptoms.
- Per State guidelines, the Charter should recommend the individual experiencing symptoms take a COVID-19 test. CWC accepts FDA-authorized viral COVID-19 tests, including a Nucleic Acid Amplification Test (NAAT, such as PCR) or Antigen tests collected and performed in a healthcare setting or certified testing site. FDA-authorized over-the-counter tests (also known as at-home/rapid tests) are also accepted.
- Staff should contact their supervisor immediately.

Students or staff who have a **confirmed** COVID-19 case:

- Individuals cannot come onto campus per CDPH/LACDPH isolation guidelines. Individuals must isolate at home and are eligible to return on day 6 if they have a negative test, after 24 hours with no fever without fever-reducing medication and symptoms having improved.

- Site administrators will notify the Charter's Talent/HR Team, identify school site contacts and quarantine per CDPH/LACDPH quarantine guidelines. School work will be provided to students during this time.
- Disinfection and deep cleaning of classroom and primary spaces where the case spent significant time will be conducted.
- Families and staff will receive notification if there is a known **positive case** that occurs at their school site.

Staff who have potential COVID-19 exposure in the workplace will be provided with information regarding the COVID-19-related benefits to which they may be entitled under applicable federal, state, or local laws and as an employee of the Charter.

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 symptoms to their supervisor, who will inform the COVID-19 Compliance Officer (CCO) and/or Principal.
- Employees can report symptoms and hazards without fear of reprisal.
- According to the [County of Los Angeles](#), all LA County residents who want a test should first call their Primary Care Provider or Healthcare Center to get a test. If an employee does not have access to care or cannot access care through their provider, free testing is offered in the County of Los Angeles.
- In the event Charter is required to provide testing because of a workplace exposure or outbreak, Charter will communicate the plan for providing testing and inform affected employees of the reason for testing and possible consequences of a positive test.
- Information will be available 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.
- Charter has established a COVID-19 Compliance Task Force ("CCTF") to coordinate communication, including communications with staff and any potentially exposed individuals and families. The CCTF in collaboration with the COVID-19 Compliance Officer, communicates to the LACDPH if positive cases and exposures occur. The CCTF is also responsible for communicating to the entire school community about cases and exposures, while maintaining confidentiality in alignment with applicable state and federal laws.

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 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.

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.
- 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 the provision of a telework assignment, provided the employee is well enough to telework, and/or an Emergency Sick Leave time-off accrual that would cover the mandated time off that an employee is excluded from the worksite and otherwise unable to work.
- Providing employees at the time of exclusion with information on available benefits.
- Employees who test positive for COVID-19 and meet criteria for potential exposure at the workplace will be provided with documentation and information regarding applying for workers' compensation.

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 D: 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 5 days have passed since COVID-19 symptoms first appeared, if the individual tests negative via an FDA-authorized COVID-19 test on or after Day 5. If the individual tests positive, they are required to remain at home for 10 days.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 5 days have passed since the date of specimen collection of their first positive COVID-19 test, if the individual tests negative via an FDA-authorized COVID-19 test on or after Day 5. If the individual tests positive, they are required to remain at home for 10 days.
 - A negative COVID-19 test will not be required for an employee to return to work, if they complete the full 10 day isolation period.
 - 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.
-

Mark Kleger-Heine, Executive Director

Date

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 for all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, parents, students, 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:

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

APPENDIX B: COVID-19 INSPECTIONS

Date:

Name of person conducting the inspection:

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			
Classroom air purifiers and filters			
Other			
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			
Other			
PPE (not shared, available and being worn)			
Face masks (cleaned/replaced sufficiently often)			
Gloves			
Face shields/goggles			
Other			

APPENDIX C: CONTROL TABLE

The following table presents examples of controls the Charter will implement in the workplace, in collaboration with LAUSD for co-located sites:

Engineering (Facilities and Equipment)
<ul style="list-style-type: none"> ● Assess job hazards for feasibility of engineering controls ● Ensure ventilation and water systems operate properly ● Alter office workspaces to facilitate physical distancing. Examples include: <ul style="list-style-type: none"> ○ Configure partitions as a barrier shield ○ Move electronic payment reader away from cashier in cafeteria, if applicable ○ Use verbal announcements, signage, and visual cues to promote physical distancing ○ Remove/rearrange furniture
Administrative
<p>Management and Communications</p> <ul style="list-style-type: none"> ● Monitor state and local public health communications about COVID-19 ● Require students who are ill to stay home ● Encourage sick workers to report symptoms, stay home, and follow CDC guidance ● Develop strategies to: <ul style="list-style-type: none"> ○ communicate with staff ○ manage staff concerns ● Remind staff of available support services ● Communicate to partners, suppliers, other contractors regarding policies and practices ● Encourage physical distancing and the use of face coverings (when required) in the workplace ● Use technology to promote physical distancing (e.g., telework and virtual meetings) ● Cancel group events ● Close/limit use of shared spaces ● Consider policies that encourage flexible sick leave and alternative work schedules <p>Cleaning and Disinfection</p> <ul style="list-style-type: none"> ● Clean and disinfect frequently touched surfaces, (e.g., counters, shelving, displays) ● Provide employees with disposable disinfectant wipes, cleaner, or sprays that are effective against the virus that causes COVID-19 <p>Training</p> <p>Provide employees with training on:</p> <ul style="list-style-type: none"> ● Symptoms, emergency warning signs, and high-factors for COVID-19 ● Policies and procedures to reduce the spread of COVID-19 ● Information regarding COVID-19 transmission, including that COVID-19 “is an infectious disease that can be spread through the air when an infectious person talks, vocalizes, sneezes, coughs, or exhales; as well as that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth; as well as that infectious people may have no symptoms.” ● Information regarding the fact that particles containing the virus can travel more than six (6) feet, especially indoors; and thus, why physical distancing, proper hygiene, and PPE are so important

- General hygiene
- Cleaning and disinfection
- Face masks
- Physical distancing
- Use of PPE
- Safe work practices
- Stress management
- COVID-19 related benefits under federal, state, and local law, including any potential benefits under current workers' compensation laws, the Families First Coronavirus Response Act ("FFCRA"), the Charter School's leave policies, and any other relevant rights.

Personal Protective Equipment (PPE)

- Conduct workplace hazard assessment
- Determine what PPE is needed for their workers' specific job duties based on hazards and other controls present
- Select and provide appropriate PPE to the workers at no cost, and train employees in the use of the PPE

APPENDIX D: 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:

Employee (or 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):	

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

*Should an employer be made aware of a non-employee infection source COVID-19 status.

APPENDIX E: CWC COVID-19 Standard Operating Procedure (SOP): Exposure Management Plan (EMP)

The Charter has drafted detailed and compliant Standard Operating Procedures in an Exposure Management Plan. This plan can be found at this link:

<https://docs.google.com/document/d/185tuUOdpspFiHmELXUS3Bh-YQyS5CDnHPPT7Z8g9H3w/edit>