

## **COVID-19 Prevention Program (CPP) for Mills College Children's School**

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

**Date:** February 8, 2021

### **Authority and Responsibility**

On behalf of Mills College, MCCA Head of School, Debra Brown has overall authority and responsibility for implementing the provisions of this CPP at Mills College Children's School (MCCA). Head Teachers are responsible for implementing and maintaining the CPP in their assigned work areas. COVID Liaison, Jenny Bond, is responsible 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 the MCCA 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 MCCA.
- 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 at MCCA and the need for different or additional controls.
- Conduct weekly 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**

Head of School, Debra Brown, MCCA COVID-19 Liaison Jenny Bond, along with MCCA Office Manager Melissa Coveney, and Teresa Henry, Program Coordinator, who comprise the MCCA Admin team, (employees' representatives) will conduct weekly evaluations via walk through and observation, to identify and evaluate potential COVID-19 hazards. Results of hazards evaluations will be shared with the Dean of the School of Education, and Mills College Officers in order to address potential hazards.

## **Employee Screening**

MCCS employees are screened before coming to campus each day. Each employee must perform a daily wellness check to determine if they may have been exposed to COVID-19 or are experiencing COVID-19 symptoms. Mills employees are to download the free MillsGo app to access the COVID-19 Health Check and Pass to complete your daily wellness check. MCCS employees are required to answer health screening questions and submit answers to see if cleared to access campus for the day. If employees answer “yes” to any of the health check questions, they are not granted access to campus and must notify Employee Services and the immediate supervisor.

## **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:

Representatives of the Admin team will create a COVID-19 Hazard Protection Spreadsheet. The spreadsheet will document observations, questions, concerns, and potential hazards. The team will identify the level of risk and the immediacy of the corrective.

A weekly communication to the respective department representative, as appropriate will communicate questions, suggestions, requests for correction.

The COVID-19 Hazard Protection Spreadsheet will be monitored weekly to ensure protective measures are implemented.

## **Control of COVID-19 Hazards**

### **Physical Distancing**

MCCS will implement six feet of physical distancing by:

Creating physical distancing between seating assignments in both the indoor and outdoor classrooms following ACPHD guidelines to meet physical distancing requirements. Students and teachers within each stable “bubble group” will maintain physical distancing of no less than four-to-six feet where feasible. Students will mix with other students within their stable bubble group for classroom instruction, lunch, and recess periods.

Non-teaching staff will maintain six feet physical distancing while in the workplace. Non-teaching staff may work remotely when possible. While on campus work stations are separated by barriers.

### **Visitors**

Non-essential visitors will not be granted access to MCCS hallways, bathrooms, classrooms, or the office area.

## **Egress**

Schedules are adjusted to ensure that only one stable group is moving through common spaces at a given time. Classroom furniture is set up to ensure 4 feet between students at their desks/tables and between students and teachers.

Students will use assigned bathrooms located in their respective spaces on campus; no more than one student will be permitted in the bathroom at a time. Adults will use adult-designated bathrooms only.

The School will utilize the entry point located on the Elementary playground for entry and exit in order to maintain physical distancing and prevent large gatherings during drop-off and pick-up times. Students will be subject to health screening upon entry to the facilities. Students will line up 6 ft apart on the sidewalk, at the lower yard gate. Parents complete the health screening and sign-in using the Brightwheel app. An administrative rep will conduct a temperature check, completing the health screening protocol. Students will move to the designated waiting area, maintaining physical distancing, until escorted to the classroom area by the Head Teacher.

## **FACE COVERINGS**

In an effort to protect all members of the M CCS community, and mitigate potential transmission COVID-19 virus, pursuant to recommendations from public health officials, all members of the M CCS community must wear a face covering while at school, except during designated meal times. Face coverings must be made out of breathable cloth materials, cover the entire nose and mouth area, and be secured to the head with elastic ties or straps. Students and employees who have been instructed by their medical provider that they should not wear a face covering will be provided with accommodations, which may include wearing a face shield with a drape on the bottom edge, in compliance with State directives, as long as their condition permits. A drape that is form fitting under the chin is preferred. Masks with one-way valves should not be used. Employees need not wear a face covering when the employee is alone in a private office. This determination will be made on a case-by-case basis.

Face coverings are to be worn:

While waiting to enter the school campus.

While on school grounds (except when eating or drinking).

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.

## **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. Face masks, shields, gloves, and other PPE will be accessible and available for staff and students. Personal protective equipment (PPE) used to control employees' exposure to COVID-19.

## Engineering Controls

We will implement the following measures for situations where we cannot maintain at least six feet between individuals:

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

- Utilize the outdoor spaces for instruction
- Create well ventilated spaces by keeping windows and doors that lead to outside spaces open in order to increase outdoor air flow and dilution of indoor air. There is forced air in the corridors, and the filters in those units have been changed out to MRV 13.
- Each classroom has two indoor air (Blueair Pure 211 units). Air purification filters will be replaced on a regular tri-monthly schedule.
- Air quality due to fires/smoke – MCCS monitors the Air Quality Index using the Purple Air monitor (set on US EPA) located on the Mills College campus. The EPA ratings and descriptions inform the decisions regarding when to play freely outdoors, remain outside with low impact play, move indoors with windows and doors closed, and school closure. (see chart below)

Good (green zone): All outside activities ok – school will be open.

Moderate (yellow zone): Outside activities are ok, outside with low impact play.

Unhealthy for Sensitive Groups (orange zone)

101-130—Short periods of low impact outdoor play

Indoors with air filters on high, doors and windows open

130-150-Indoors with doors and windows closed—Air filters on high

130-Families notified of increasing AQI and school closure if AQI reaches Red - Unhealthy (red zone): school will be closed; observe day of force majeure.

Very Unhealthy (purple zone): school will be closed; observe day of force majeure.

## CLEANING, DISINFECTION

**Disinfecting:** Janitorial staff perform nightly cleaning and disinfecting of all occupied classrooms, restrooms, offices, and hallways, using EPA-approved disinfectants against COVID-19. MCCS Housekeeping staff clean and disinfect restrooms and all high touch surfaces throughout the school day. Electrostatic disinfecting machines with EPA-approved disinfectants are used daily. MCCS Staff will be informed of the daily cleaning and disinfecting schedule.

Each classroom and office will have safe and effective cleaning (disinfecting solution or wipes) supplies to sanitize surfaces and high-touch areas throughout the day. The faculty and housekeeping staff will clean and disinfect all frequently touched surfaces and objects students and employees come in contact with. MCCS Housekeeping staff will clean and disinfect throughout the day including

wiping down all high traffic areas and highly touched surfaces at regular intervals. Cleaning service conducts deep cleaning and disinfecting of all surfaces in highly touched areas such as classrooms, restrooms, offices and all interior surfaces after the end of the school day.

**Restrooms:** High touch areas are cleaned thoroughly each day, including:

- Faucet handles
- Toilet flush levers & toilet seats
- Counter tops
- Sinks
- Doorknobs
- Light switches

**Occupied Classrooms:** Thorough cleaning is done daily. High touch areas in classrooms include:

- Tables/desk
- Chairs
- Counter tops
- Sinks
- Doorknobs
- Light switches
- Handles

### **Shared tools, equipment and personal protective equipment (PPE)**

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.

Soft furnishings, including bean bags, area rugs, cushions, stuffed animals, etc. have been removed. Classroom windows and doors will remain open for fresh air circulation, and to reduce students and staff touching door knobs.

Curriculum and materials will not be shared. Students will have individual and personalized kits with learning materials, books, art supplies, and music equipment.

### **Outdoor Areas**

MCCS Housekeeping staff will clean outdoor areas of the School campus routinely. Playground equipment will be disinfected daily before and after each usage.

### **Hand Sanitizing**

- Hand sanitizer stations are mounted throughout the hallways and bathrooms.
- Soap dispensers are mounted in bathrooms and classrooms.

The MCCS Admin team will authorize additional hand sanitizing stations, based on a weekly needs assessment.

## **Investigating and Responding to COVID-19 Cases**

In the event a case of COVID-19 is detected within our school community, we will implement the following protocol:

- Notify Mills College COVID liaison
- Notify ACPHD
- Notify DSS CCCL
- Notify families
- Implement 10 day quarantine protocol
- Initiate cleaning of the exposed space(s)
- Implement contact tracing protocols

ACPHD contacts the family who tested positive to initiate contact tracing. School leadership will work with ACPHD to communicate the appropriate information to the school community. MCCS will close off areas used by any COVID-19 positive person, and will clean and disinfect the classroom spaces.

MCCS Admin will analyze the details of the positive COVID-19 case and support the identification of adults or children who may have had close contact with the positive case. Alameda County Public Health defines Close contact as: the exposed group includes all members of the case's stable cohort (students and staff) and any additional individuals known to have been in close contact with the case (within 6 feet for  $\geq 15$  minutes) during the case's infectious period.

The classroom bubble group associated with a positive diagnosis will need to quarantine for 10 days regardless of test results. Testing of the classroom bubble group associated with a positive diagnosis is recommended.

A child/staff member can return to school once they have met all three criteria:

- Respiratory symptoms are improving
- Fever free for 24 hours without the use of fever reducing medicines AND
- At least 10-day isolation period has passed since illness onset

MCCS will provide via contracted COVID-19 testing provider, weekly on-site COVID-19 testing, during work hours, at no cost to employees.

## **System for Communicating**

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

- Employees with COVID-19 symptoms are to notify an MCCS COVID-19 Liaison and [hrbenefits@mills.edu](mailto:hrbenefits@mills.edu) immediately upon experience of symptoms for release from work and to ascertain a medical assessment, and/or quarantine period.
- Employees can report symptoms and hazards without fear of reprisal.
- MCCS COVID-19 Liaison forwards employees with COVID-19 symptoms to the Employee Benefits representation for consultation regarding the appropriate next steps.

- Employees are advised to quarantine, seek medical advice, test for COVID-19.
- Employees - please see the following for voluntary COVID-19 testing
  - <https://curative.com/search>
  - <https://curative.com/search> <https://covid-19.acgov.org/testing>.

If an employee has been isolated because of symptom(s), they receive a **negative test result for COVID-19** and want to return to school before 10 days have passed:

*Negative COVID-19 test result- The staff member or child can return before the end of the 10-day quarantine if all three of the following criteria are met:*

- *They are feeling better. (The symptoms do not have to be completely resolved.)*
- *There have been at least 24 hours with no fever, diarrhea or vomiting, without taking medicines to lower a fever, like acetaminophen (Tylenol) or ibuprofen (Advil or Motrin).*
- *A medical evaluator (generally a doctor, a nurse practitioner, or a certified physician assistant) provides a letter indicating that 1) the symptoms are NOT due to COVID-19. Due to varying sensitivities of available tests, the letter is needed to verify the reliability of the COVID-19 test and to ensure that the symptoms have an explanation other than COVID-19. For privacy reasons, MCCA is not allowed to require disclosure of the alternative diagnosis.*

## **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. Employees who are ill due to COVID-19 symptoms are to quarantine, with full pay for the duration of the period of time the employee is ill. The employee is to record the hours on their Exempt Log or Timesheet as a work day.
- Facts related to COVID-19, as 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 (asymptomatic).
- 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:

- Notify all employees and employees' authorized representatives who may have had COVID-19 exposure within one business day in a manner that does not reveal the COVID-19 case's personal identifying information
- Offer testing at no cost to any employee potentially exposed to COVID-19 in the workplace, and provide applicable benefit information. Employees are paid **regular hours for the period of quarantine** for non-work time (quarantine period) due to COVID-19 exposure.
- The time an employee spends being tested is considered compensable hours worked.
- Exclude from the workplace employees who test positive for COVID-19 and employees with COVID-19 exposure, and follow the requirements for preserving their pay and benefits. Employees receive full compensation for non-work time due to COVID-19 exposure.
- Follow the return to work criteria for returning excluded employees to work
- Investigate the exposure and address hazards
- Follow all recordkeeping and reporting requirements for employee COVID-19 cases.
- Exclude employees with direct exposure to the COVID-19 positive case, from the workplace for 10 days after the last known COVID-19 exposure.

## Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases, related serious illnesses or death at our workplace to Mills College Officers, Alameda County Public Health Department, and DSS CCCL, and provide any related information requested by the local health department and governing bodies, , as defined under CCR Title 8 section 330(h).
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

## Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
  - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
  - COVID-19 symptoms have improved.
  - At least 10 days have passed since COVID-19 symptoms first appeared.
- COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate

was effective, or 14 days from the time the order to quarantine was effective.

---

*Debra L. Brown*, MCCS Head