



COVID-19 Safety Plan (CSP) for Pivot Charter School San Diego II

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

Date: June 4, 2022

Authority and Responsibility

The Executive Director has overall authority and responsibility for implementing the provisions of this CSP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CSP 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.
- Conduct weekly staff meetings and create opportunity for employees to share Covid-19 protocol concerns
- Send staff email notifications (as needed) of Covid-19 symptomatic/exposed/positive cases and reminders on safety protocols when there are positive or potential cases.
- Distribute online survey where parents and staff can anonymously share concerns about violations or COVID -19 hazards

Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by:

- **Participating in weekly staff meetings about COVID-19 hazards**
- **Email, text or call the COVID Coordinator or Executive Director or the employee's direct supervisor**
- **Participate in Governing Board meetings where COVID-19 hazards will be discussed**
- **Complete anonymous online surveys about COVID-19 hazards**

Employee screening

We screen our employees by:

- **Requiring staff to take their own temperature when they come to work each day and enter their temperature and complete a confidential questionnaire about their exposure and symptoms in our newly created online portal.**
- **Provide asymptomatic testing when it is locally accessible.**
- **Require testing and quarantine according to local Department of Public Health guidelines when an employee reports they may be exposed or may be exhibiting symptoms.**
- **If an employee develops a symptom consistent with Covid-19 during their work day they are to immediately isolate and are sent home from work.**
- **Pivot will ensure that face coverings are used during screening by both screeners and employees and, if temperatures are measured, that non-contact thermometers are used.**

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:

- **Conduct workplace-specific evaluations**
- **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 the 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 COVID-19 policies and procedures.**
- **Operate pursuant to existing COVID-19 Protocols and Policies**

The Executive Director or COVID Coordinator or the Site Administrator will assess the severity of the hazard and assign correction time frames. If supplies or engineering is needed the ordering process will happen on the same day of hazard being identified. Shipping will be as fast as possible, regardless of cost, in order to correct the hazard.

Control of COVID-19 Hazards

Physical Distancing

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

Physical Distancing

We ensure at least three feet of physical distancing where possible in our workplace by:

- **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 students should be located or their direction and path of travel where necessary.**
- **Staggered student arrival, departure, work, and break times.**
- **Staff meetings are still conducted online.**

Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth as required by the California Department of Public Health (CDPH) or local health department.

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

- When an employee is alone in a room with the door closed.
- While eating and drinking at the workplace, provided employees are at least three feet or more apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis. In all these cases, staff will be separated from others with a plexiglass shield.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart such as providing speech and language support services to students. In all these cases, staff will be separated from others with a plexiglass shield.

Engineering controls

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

- **Plexiglass desk or wall dividers**
- **Working outdoors**

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

- **Opening windows and doors regardless of outside weather conditions.**
- **Cancelling school on inclement and smoky days**
- **Having Merv 12 air filters for our ventilation systems where feasible**
- **Installing Portable Hepa Air cleaners in all spaces**
- **Surveilling CO2 monitors in classrooms at least on a weekly basis**

Cleaning and disinfecting

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

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

- **Ensuring adequate cleaning supplies for each employee in their classroom including Bioprotect, gloves, and paper towels**
- **Facilitate daily cleaning**
- **Hire cleaning company to clean at least twice per week or more, if necessary**
- **Informing employees how often their work space is cleaned (everyday students are on campus) and when to use additional cleaning supplies as provided.**
- **Surfaces will be cleaned and disinfected before and after eating times for staff and students**

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

- **Ventilate area by keeping windows open for an entire day**
- **Inform our cleaning company of the positive case and have them deep clean the room**

while students and staff are off campus.

- **The room will not be used by others for a minimum of 24 hours to 3 days.**

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 cleaned between uses. Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- **Evaluated handwashing facilities and added where necessary.**
- **Encourage and allow time for employee handwashing.**
- **Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).**
- **Encourage employees to wash their hands for at least 20 seconds each time.**

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.

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**
- **Required to work from home for the required amount of days of quarantine per local DPH guidelines or until proof of a negative test. If not well enough to work from home, additional sick leave will be provided if authorized by federal and/or state governments.**
- **Staff will be allowed to utilize all available COVID sick leave if they must be off from work due to COVID exposure. If needing to be off work due to COVID exposure AT PIVOT, staff will be allowed to use their COVID sick leave, and then if there is any need for more days paid sick leave will be used. Employees will not be forced to use their regular vacation/personal days for time off due to COVID exposure if that exposure was AT PIVOT.**
- **Any changes in exposure protocols will be shared with employees in a timely fashion.**
- **Reports from the County Department of Health, pertaining to exposure, will be shared with employees as needed.**

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:

- All concerns of hazards and exposure should be reported to the COVID Coordinator or their designee, AND their Site Administrator.
- Employees can report symptoms and hazards without fear of reprisal.
- Employees with pre-existing conditions are encouraged to let the Director of Human Resources or the Executive Director know to discuss possible accommodations.

- Employees have been provided a list of multiple locations where Covid-19 testing can be accessed. Additionally, faculty may access the local hospital testing site.
- In the event we are required to provide testing to students 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. This exposure information will be shared through our ParentSquare application with families and staff as well as staff emails. Additionally, the COVID Coordinator or a member of the Covid-19 Team will personally speak with any exposed employees and walk them through the testing recommendations and quarantine procedures per the County Department of Public Health.
- Information will be distributed 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.
- Daily (as necessary) emails, on work days, will be sent by the Covid Coordinator or their designee with current symptomatic, exposed and positive case counts.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least three feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- The protocols for entering the building and use of the online portal.
- The requirement for cleaning work areas.

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace, when applicable, per guidance from federal, state, and local health departments and agencies.
- 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 allowing employees to be out of work on exposure without using designated vacation/personal days while federal or state COVID leave is available. If well, employees will be

asked to tele-communicate to work.

- 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 Safety Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Safety 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.
- Use the daily email or mass phone communication system through ParentSquare to communicate student and employee symptomatic, exposed or positive cases with appropriate testing date, date of notification, date of end of symptomatic return (if applicable), date of exposure return (if applicable), when there is a positive case or potential case, while maintaining confidentiality of staff, parents, contractors, visitors and students.
- Check in with employees who are exposed and quarantined.

Return-to-Work Criteria

- COVID-19 cases with a positive test result or COVID-19 symptoms will not return to work until all return-to-work criteria have been met.
 - Return-to-work criteria will be updated regularly based on official guidance from the CDC, CalOSHA, CDPH, and local DPH. If return-to-work criteria differ among the agencies, Roads/Pivot will enforce the strictest of the recommended protocols.
 - 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.
 - Close contacts who remain symptom free do not need to quarantine, but will be required to obtain a COVID-19 test and follow all masking requirements as outlined by the California Department of Public Health (CDPH) or local health department.
-

This Plan has been approved by the Governing Board of Roads Education Organization

Appendix B: COVID-19 Inspections

[This form is only intended to get you started. Review the information available at www.dir.ca.gov/dosh/coronavirus/ for additional guidance on what to regularly inspect for, including issues that may be more pertinent to your particular type of workplace. You will need to modify form accordingly.]

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
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			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

Appendix C: Investigating COVID-19 Cases

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

All employees' medical records will 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: [enter date]

Name of person conducting the investigation: [enter name(s)]

COVID-19 Case Investigation Information

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):	

Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:			
All employees who may have had COVID-19 exposure and their authorized representatives.	Date:		
	Names of employees that were notified:		
Independent contractors and other employers present at the workplace during the high-risk exposure period.	Date:		
	Names of individuals that were notified:		
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		What could be done to reduce exposure to COVID-19?	
Was local health department notified?		Date:	

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

Appendix D: COVID-19 Training Roster

Date: [enter date]

Person that conducted the training: [enter name(s)]

Employee Name	Signature

Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CSP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]

This section of CSP 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 facilitate COVID-19 testing to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
 - Any symptomatic employees in our exposed workplace will be tested. Since all employees working on site are required to be vaccinated, asymptomatic employees will not be required to be tested.
 -
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure positive COVID-19 cases are excluded from the workplace in accordance with our CSP **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 CSP **Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review and hazard correction

In addition to our CSP **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 ventilation.
 - Insufficient air filtration.
 - Inadequate enforcement of masking requirements.
 - 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.
- Improving enforcement of masking requirements.
- Increasing physical distancing as much as possible.
- Respiratory protection.
-

Notifications to the local health department

- Immediately, but no longer than 24 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 will need to be added to your CSP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]

This section of CSP 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 facilitate COVID-19 testing for 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 positive cases and employees with COVID-19 symptoms are excluded from the workplace in accordance with our CSP **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 CSP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CSP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department**.