



VCA COVID-19 Prevention Program

With some exceptions, all 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\(c\)](#)).

Victory Christian Academy has created the following employee COVID-19 Prevention Program, based upon model guidelines from CalOSHA. This program is designed to comply fully with all California state and Sonoma County local COVID-19 guidance for schools and workplaces. The information contained in this program has been, and will continue to be, communicated to all VCA staff verbally and in writing. All VCA employees are welcome to communicate any questions or concerns, without fear of reprisal, to the principal or the school board in-person, by phone or via email.

This prevention program will be continually reviewed and updated should any of the guidance from CalOSHA or state and county departments of public health change. Our desire is to provide a safe working environment for all employees at Victory Christian Academy, and this program was developed to that end. This program document contains forms in its Appendices, designed to be filled out as needed or required by employees of VCA. Please review these forms and contact the VCA principal and/or school board with any questions or clarifications. Contact information for the principal and board are listed below.

VCA Principal:

Phone- (707) 539-1486

Office- 4585 Badger Road, Santa Rosa, CA 95409

Email- principal@victoryca.org

VCA Board:

Office Box- VCA Office 4585 Badger Road, Santa Rosa, CA 95409

Email- board@victoryca.org

COVID-19 Prevention Program (CPP) for Victory Christian Academy

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

Date: 4/27/2021

Authority and Responsibility

The VCA principal has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all VCA faculty and staff are responsible for implementing and maintaining the CPP in their assigned work areas, and any staff overseeing other staff are 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.

Development of Plan

This reopening plan has been developed in consultation with the VCA school board, staff, parents. VCA seeks to follow all CDC, state, and county guidance in reopening, especially the guidance provided in the "Consolidated Schools Guidance" from the CDPH.

The faculty of VCA is not part of a labor union. The plan was discussed during its development at multiple staff meetings, especially at the staff meeting of November 5, 2020. Staff has also been provided surveys to get input without fear of retaliation.

There have also been multiple parent surveys sent out to gauge the comfort level of reopening under various circumstances. The most recent survey was conducted on January 11, 2021.

The school board is given progress updates at every meeting and several members serve on the reopening task force.

Scope of CPP & School Reopening

This CPP covers the following campus uses:

- Administrative and office staff working from campus. *While much administrative work is done by employees from their homes, there is usually at least one individual present on campus during business hours on school days, and always when students are present on campus.*
- Faculty using their classrooms to teach remotely. *Some secondary faculty prefer to work from their classrooms due to access to materials, technological tools, or superior internet access. As they are on campus, they are required to abide by all the provisions of this CPP.*
- Faculty teaching students in-person.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

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

Employee participation

Employees are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Meeting in-person** with the VCA principal to communicate any hazards (principal will share with the school board), OR **Submitting in writing** via email or letter to office, any hazards or concerns to the principal or any school board member at board@victoryca.org.

Employee, student, and visitor screening

We screen our employees and students by:

- Required daily symptom checks to be completed by employees and parents any time they will be on campus before entering campus. Employees and families should carefully review the list of [symptoms](#) to identify whether they are well enough to be on campus.
- Requiring visitors to check-in at the office and receive a temperature check before entering campus for any reason.

If an employee is unable to pass the screening criteria, they will either be allowed to work/teach from home, or in some cases a substitute teacher may be provided. The administrator will make this determination on a case by case basis. Staff who are symptomatic or have known COVID-19 exposure will be required to take a COVID-19 test before returning to campus.

If a student is unable to pass the screening test, they will be required to stay home. Students who are symptomatic or have known COVID-19 exposure will be required either to take a COVID-19 test before returning to campus, or wait for the standard 14 day quarantine. Teachers will provide opportunities for students to work at home and make up class work, and students will also be able to participate in the “distance learning” portions of class.

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:

Employees who observe any potential hazards as mentioned above are asked to complete a COVID-19 inspection form and submit directly to the principal either in-person in the office or via email. Employees may also submit this form directly to the school board at board@victoryca.org.

If an employee notes a hazard that must be addressed urgently, that employee is asked to notify the office directly during work hours, or the principal outside of work hours via cell phone.

The VCA COVID Task Force will address and correct these hazards within 48 hours (business days). In the event that equipment is needed or the logistics of correcting the issue require this timeline to increase, temporary adjustments will be made as needed to ensure safety and compliance while waiting for needed equipment or facilitation of any repairs or service.

The COVID Task Force is composed of

- Marlin Viss (Board Member)
- Wendy Cunningham (Principal)
- Kevin O'Malley (Board Member)

Control of COVID-19 Hazards

Physical Distancing

We ensure at physical distancing at all times in our workplace by:

- Requiring staff and students to maintain a distance of at least 6 feet from others whenever possible. In some cases student desks may be closer than 6 feet to one another in compliance with CDC and CDPH requirements, but student desks will always be at least 6 feet from staff and at least 3 feet from other students.
- Limiting the number of adult volunteers we allow on campus (*No volunteers allowed in classrooms while in purple tier*)
- No school bus service
- VCA will not encourage or facilitate car pooling.
- Deploying signage, both on doors and on the floor, to remind occupants to socially distance as well as indicate how far apart 6 feet looks. Decals are placed in front of the school office, within the office, and leading into our campus restrooms.
- Staff must eat in their own office/classroom or outside at picnic tables rather than in the staff lounge.
- Limiting the number of employees/visitors in the office at a given time through signage and floor decals. Plexiglass screens have also been deployed at the front counter in the office.
- Encouraging the use of both copiers, which are located in two separate rooms.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved. ***Teachers who must address a student briefly at a closer proximity to help them should wear a face covering.***

Face Coverings

We require clean, undamaged face coverings and ensure they are properly worn by employees and students over the nose and mouth when indoors and outdoors, except while eating or drinking. *VCA will maintain a supply of disposable face coverings in the office, designed for one-time use for employees or students who do not have a face covering that meets CDPH guidelines, which stipulate that these coverings:*

- Fully cover both the nose and mouth without frequent adjustments
- Fit closely against the skin and do not have vents or openings on the bottom or sides
- Otherwise satisfy the [CDPH guidelines](#) for facial coverings, including thickness, material, and no “valves”

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

- When an employee is alone in a room or individual office. For example, when a teacher is instructing remote students via video conferencing.
- While eating and drinking at the workplace, provided employees are more than six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible. However, outdoor eating of meals is strongly encouraged. Covered outdoor eating areas are provided for this purpose.
- Employees or students 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. In these cases a suitable alternative should be provided, such as a face shield with a drape on it, if their condition permits it.
- Children who are under 2 years of age should not wear a mask.
- ***Employees will notify VCA administration if they encounter any activities that are not feasible to complete while wearing a face covering.***

Any employee or student not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, will not be permitted to remain on campus and must participate in distance learning.

Engineering controls

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

- **Plexiglass partitions** will be used in the office to separate office staff from visitors when six feet cannot be maintained during exchange of items or paperwork. *Note that scheduled exchange of books, papers, etc. will take place outside.*
- **Facial coverings** are required on campus except under the exceptions called out by the CDPH Guidelines.

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

- **Air purifiers with HEPA filtration** are used in every classroom and work area, and will be turned up to *medium or higher* in cases where outdoor air should not be pulled in. (*wildfire smoke, other environmental hazards*)
- **The HVAC filtration system** in classrooms and work areas has been upgraded to MERV13, which is the highest level that can be accommodated by the system. The system is inspected and maintained by the facility owner, Santa Rosa Bible Church.
- **In the event of poor air quality or power outage** that prevents drawing in and filtration of outside air, VCA will revert to distance learning for all or part of the day, depending on the circumstances. Outdoor and indoor air quality is measured using a hand-held AQI sensor.

Cleaning and disinfecting

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

- Each classroom, Office, and workspace shall have a bottle of Top Clean and Disinfectant, along with a supply of microfiber cloths for cleaning and disinfecting frequently touched surfaces such as desks, light switches, door handles, etc. Both the Top Clean and our Disinfectant are EPA rated to be safe and the Disinfectant is rated to kill the COVID virus.
- Employees will wipe down regularly touched surfaces in their rooms such as counters, light switches and door knobs, as well as surfaces or items potentially shared with others. (Phones, desks)
- Playground equipment and playground tables will be disinfected daily using an electrostatic sprayer with COVID-rated Disinfectant in-between uses by different groups during the day.
- Restroom cleaning frequency has been increased and cleaning is done using disinfectant rated to kill the COVID virus.

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

- Indoor spaces, when practical, will be left unused for 24 hours OR per local health department guidance. When this isn't possible, upon approval from the health department, a different space will be used temporarily while next steps are taken to clean and disinfect.
- To clean the area, facility staff, wearing face masks and gloves, with HEPA air filtration systems turned on, wipe down surfaces and spray using the electrostatic sprayer with COVID-rated disinfectant.
- In the event of more than one case of COVID exposure in a room or area, VCA administration and board will determine, with input from the local health department, whether an outside service should be used for cleaning and disinfection.

Shared tools, toys, equipment and personal protective equipment (PPE)

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

School supplies (pencils, scissors, markers, chairs, desks, etc.) are individualized per student to the greatest extent possible.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by:

- Wiping down using one of the COVID-rated products available in the school office.
- Using the electrostatic sprayer, when practical, to spray down the shared items

Playground equipment is only used by a single stable group at a time and is sanitized between groups.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Maintain a supply of effective hand sanitizer in dispensers in each classroom by the door on the wall or by the sink, as well as in every restroom. We will not use hand sanitizers that contain methanol.
- Encourage and allow time for employee handwashing using signage and reminders in meetings. This signage and communication includes reminders to wash hands for at least 20 seconds each time.
- As our teachers and staff to model and instruct students in proper handwashing techniques and appropriate use of hand sanitizer.

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.

**VCA employees are all required to wear facial coverings that satisfy CDPH requirements indoors at all times, as well as outdoors when they may be less than 6 feet from others.*

Investigating and Responding to COVID-19 Cases

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

Employees and students who had potential COVID-19 exposure (exposure/close contact per CDC- Someone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period* starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated) **in our workplace OR show potential COVID symptoms will be:**

- **Notified, in writing** of their potential exposure to COVID-19 by the principal or a contact tracer.
- **Required to test for COVID-19:**
 - The optimum time to test for COVID-19 is **8-10 days** after exposure.
 - VCA offers COVID-19 testing to employees and students at no cost during school hours using Curative test kits. After-hours testing may be arranged if a trained staff member is available to conduct it. Confidential results will be texted to the individual and VCA administration will be notified as well by Curative.
 - Employees and students have the option to choose to test with their private care provider, provided the turn-around time for scheduling the appointment, getting tested and getting results takes *no more than 72 hours*.
 - Employees and students who refuse either the VCA-provided test or to provide their own test results will be required to remain off campus for **up to 24 days** after exposure--10 days for incubation, plus 14 days for the Virus to run its course.
- **Symptomatic students and employees** may not return to campus until they are confirmed negative for COVID-19, have been fever-free for at least 24 hours without the use of fever-reducing medications, AND symptoms have improved.
- **Asymptomatic students and employees** *with known exposure* to COVID may not return to campus until they are confirmed negative.
- **Asymptomatic students and employees** *without known exposure* to COVID may continue to come to work until their test results are communicated
- **Employees who must miss work due to illness from COVID** will not lose pay. This will be

accomplished through employer-provided leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

Contact Tracing

In the event that a staff member or a student becomes ill, the process of contact tracing will begin in order to determine what implications, if any, there are to the VCA community.

- **The VCA Contact Tracing Team:** The following trained individuals compose the contact tracing team:
 - Director: Dr. Josh Hammer, certified contact tracer, VCA board member (josh.hammer@victoryca.org)
 - Director assistant: Adria Poole, VCA Office assistant (apoole@victoryca.org)
 - Liaison to SoCo Health Department: Wendy Cunningham, VCA Principal (wcunningham@victoryca.org)
- **Contact Tracing Process:** upon determination of a confirmed positive case of COVID-19, VCA will follow the procedure outlined by Sonoma County Health in their COVID Case Flowchart (see flowchart, appendix E). Part of the process includes:
 - Director will conduct telephone or virtual interviews with the individual (or individual's parent) to make an initial determination of those who may have been in close contact.
 - Director, with the support of the assistant, will contact all possible individuals who came into close contact with the infected individual. If necessary, the principal and office manager will join in this effort should the number of people impacted require it for a swift response.
 - Director's assistant will compile a printed report of the results of any interviews and those determined to be in close contact with the original individual who tested positive, following privacy laws.
 - VCA Liaison (principal) will contact the Sonoma County Health Department and share the information gathered by the contact tracing team. Upon receiving any response or advice from the Health Department, the principal will communicate this guidance to the contact tracing director and they will communicate the plans to the VCA staff and family community, which may include requiring individuals to isolate themselves, class closure or even school closure.

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 COVID-19 symptoms and possible hazards** using the form in Appendix A, *Identification of COVID Hazards*. The form may be emailed or brought to the principal in person, or it may be emailed to the school board at board@victoryca.org.
- VCA employees can report symptoms and hazards **without fear of reprisal**.
- Employees that are at increased risk of severe COVID-19 illness are allowed to work from home.
- Employees may use VCA's contracted on-campus testing through Curative. If the employee prefers, they may use their own healthcare provider.
- In the event we are required to provide testing because of a workplace exposure or outbreak, VCA will provide drive-up COVID testing at no cost to our employees and students, and will notify employees of any exposure to COVID in the workplace. Our process is detailed in the *Additional Considerations* sections of this document. In addition, in the event of exposure or outbreak, our process will be clearly communicated to our employees by email.
- Information 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.

VCA communicates with staff and families primarily via email, but also can send school-wide text messages, such as in the event of an unexpected school/class closure. In the event of exposure or outbreak, VCA will notify the school community using a form similar to that in Appendix F. Care will be

taken to ensure privacy in accordance with FERPA/HIPAA.

Staff Training and Instruction

VCA will provide effective training and instruction for staff. Training is conducted by Principal Wendy Cunningham and 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 six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Additional training sessions will be held if protocols need to be adjusted or are not being consistently followed.

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

Student/Family Training and Instruction

VCA provides training to families about our COVID-19 protective measures. We provide this by:

- **Regularly** communicating our protocol via newsletters.
- Posting our guidelines and protection plan on our website, www.victoryca.org.
- Posting distancing, mask, and screening protocol outside office and classroom doors.
- Reviewing guidelines via virtual events prior to opening.
- Reminding families of guidelines at pickup/dropoff.
- Additional virtual meetings may be held if campus COVID protocol needs to be adjusted or if it is not being consistently followed.

VCA provides training to students by:

- Consistently but gently enforcing rules surrounding distancing, masking, etc.
- Demonstrating and modeling proper hand hygiene.
- Bullying or intimidation relating to COVID-19 illness is not tolerated.

Exclusion of COVID-19 Cases at VCA

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: 10 days from onset of symptoms if symptomatic or if asymptomatic, at least

10 days from positive test date, unless the health department or health practitioner determines otherwise.

- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case or upon receiving a negative result from a PCR test at the recommended point in time by the local health department.
- 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 through employer-provided leave benefits, payments from public sources or other means of maintaining earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.
- Providing employees at the time of exclusion with information on available benefits.

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases at VCA** 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/School Criteria

- **COVID-19 cases with COVID-19 symptoms** will not return to work/school 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 **AND**
 - COVID-19 symptoms have improved **AND**
 - 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 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 individual to return to work/school, provided the isolation/quarantine requirements are satisfied.
 - Employees and students who refuse either the VCA-provided test or to provide their own test results will be required to remain off campus for **up to 24 days** after exposure--10 days for incubation plus 14 days for the Virus to run its course.
 - If an order to isolate or quarantine an individual is issued by a local or state health official, the individual will not return to campus 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.
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Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide 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:
 - All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
 - After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
 - We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

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

COVID-19 investigation, review and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient outdoor air.
 - Insufficient air filtration.
 - Lack of physical distancing.
- Updating the review:
 - Every thirty days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
 - Moving indoor tasks outdoors or having them performed remotely.

- Increasing outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing as much as possible.
- Respiratory protection.
- Other changes recommended by local health officials

Notifications to the local health department

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

Additional Consideration #2

Major COVID-19 Outbreaks

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide twice a week COVID-19 testing, or more frequently if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

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

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

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

- 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. We will work with the building owner, Santa Rosa Bible Church, to promptly address any deficiencies found in the building ventilation systems, in accordance with the terms of our lease. 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**.

Appendix A: Identification of COVID-19 Hazards- Victory Christian Academy

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example: meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Completed forms should be handed in to the Principal or emailed to principal@victoryca.org

Person conducting the evaluation:

Date:

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

[illegible]

Appendix B: COVID-19 Inspections- Victory Christian Academy

Completed forms should be handed in to the Principal or emailed to principal@victoryca.org

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)			
Air purifiers functioning and being utilized			
HVAC system is being maintained properly and functional			
Other concerns?			
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			
Clear and adequate signage			
Thermometers available and functional in office and classrooms.			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves (as needed, not required)			
Face shields/goggles (as needed, not required)			
Staff members completing daily screening			
Other concerns?			

Appendix C: Investigating COVID-19 Cases at VCA

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:

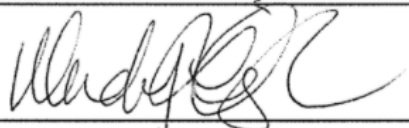

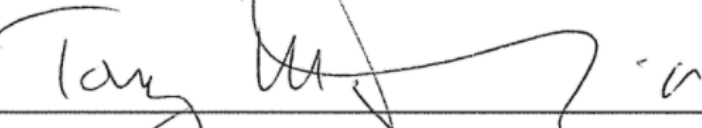


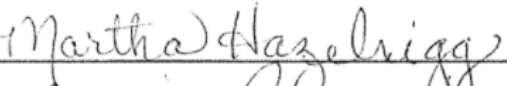

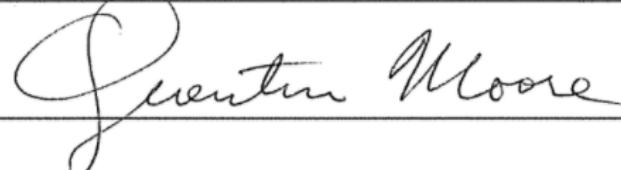
Name of person conducting the investigation:

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):	
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- Victory Christian Academy**Date:** 1/20/21 AND 2/03/2021**Person that conducted the training:** Wendy Cunningham

Employee Name	Signature
Wendy Cunningham	
Emma Beidatsch	Emma Beidatsch
Heather Kreischer	
Tony Marsaglia	
Lise Marseglin	
Sara Viss	
Martha Hazelrigg	
Julie Arendt	
N. Laremore ↔	NIXIE LAREMORE
Quentin Moore	

Appendix E: COVID-19 Notification Process

Sonoma County

COVID-19 Notification Process

in the event of a case at school



Call the Schools Public Health Hotline (shared with district superintendents & COVID-19 liaisons)



CONFIRMED POSITIVE CASE



If school/district learns of a confirmed case/cases involving a student/staff member before being contacted by public health, they should contact public health via the school hotline number. When contacting public health about a student, district should work with their legal counsel to ensure that FERPA* protocols are being followed.

In consultation with Public Health, the appropriate school official may decide whether a class, school, or district closure is warranted, using the guidance provided by California Department of Public Health (CDPH) (p. 2)

- School/district supports contact tracing and follows FERPA protocol for students
- Where necessary, communicates information about quarantine of affected classes/ after school programs/bus cohorts to the affected groups
- Notifies general school community without disclosing personally identifiable information of students or staff
- Ensures proper cleaning of affected classrooms and common areas or the entire school campus before they are reopened



When an individual is confirmed to have COVID-19, Public Health will work with the individual/family to identify "close contacts." ** If the individual had close contacts at a school, the public health nurse contacts the school /district via the COVID-19 liaison.

Public Health works with COVID-19 Liaison to conduct contact tracing and notify exposed children/staff following FERPA protocol for student information.

Public Health determines whether quarantine and testing is necessary based on length of exposure, number of people exposed, and closeness of contact.

Public Health notifies school/district when it is safe to reopen the classroom or school, and school/district makes final determination when to reopen based on CDPH guidance (p. 2)



SUSPECTED/POSSIBLE CASE



If a student/staff member becomes ill at school with a fever or other COVID symptoms, minimize contact and isolate immediately. Anyone interacting with them must wear a mask, gloves, and other PPE as appropriate. The ill person should wear a mask and go to a dedicated room and be safely sent home as soon as possible. If symptoms are severe***, send person to a healthcare provider or call 911. Wait 24 hours before cleaning dedicated room.



If a student/staff member becomes ill at home, they should NOT come to school. Staff should be accommodated or given sick leave. Ill students must continue to have access to instruction.

Affected individual/family contacts doctor for evaluation, COVID-19 testing eligibility, and clearance to return to school. If unable to obtain medical clearance due to lack of health care, advise not to return to school until they have met district criteria or CDC criteria to discontinue home isolation.

The public health department will contact the school if the individual is confirmed to have COVID-19, at which point the school will follow the "confirmed positive case" procedures outlined to the left.

*FERPA (Federal Educational Rights and Privacy Act) Protocol: If a school/district contacts public health regarding a student illness, they should work with their legal counsel to ensure that they follow proper FERPA protocols for student privacy.

**Close Contact: For contact tracing, only "close contacts" will be notified by public health. This is defined as someone who has been exposed to the sick individual at a distance of six feet or less for more than 15 minutes, irrespective of face coverings.

***Severe Symptoms: Symptoms that would require immediate medical attention include: Trouble breathing, persistent pain or pressure in the chest, new confusion, inability to wake or stay awake, bluish lips or face.

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Appendix F: Form Letter for Communication

In the event that VCA learns that an individual with COVID has been on campus during their infectious period, VCA will send a message similar to the following, after the contact tracing has been completed:

Dear VCA Families,

VCA has discovered that an individual was on campus on <dates> during their infectious period with COVID-19. The CDPH defines the infectious period as between two days prior to symptom onset and ten days following symptom onset. VCA has implemented our COVID-19 response protocol which includes the following steps if and as appropriate:

- *Isolation or self-isolation of the individual with COVID-19*
- *Investigation and contact tracing to identify, notify, and self-quarantine any individuals who have had close contact exposure*
- *Cleaning the areas of campus where the individual visited per CDC guidance*
- *Notifying and working with the Sonoma County Health Department*
- *Providing COVID-19 tests to staff and students. VCA works with the Health Department to determine the optimal time to administer the test, based on the exposure date.*
- *Reverting to VCA @Home, our distance learning program, if the situation warrants it.*

Because we keep our classes separate and in stable groups, a case in a single class does not

ordinarily require the entire school to revert to VCA @Home. If your class needs to revert to distance learning, you will be directly contacted by VCA.

Illnesses are personal medical information subject to privacy so we will not release the name of the individual involved. If you have not already been contacted by our contact tracing team, then there is no impact to you and/or your children do not need to isolate.

For more information about our COVID response protocol, you may consult our “COVID-19 Protection Plan” which is posted in the “COVID-19” section of our website, www.victoryca.org.

If you have any questions, please contact me at principal@victoryca.org

Wendy Cunningham