

# COVID-19 Prevention Program (CPP)

## UCLA Lab School

Last Updated: 2/17/2021



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

### Authority and Responsibility

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

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

### Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- 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 A: 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.
- **Work closely with UCLA Campus Administration to identify and rectify any additional COVID-19 hazards as needed**

### Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by taking the UCLA COVID-19 Health and Safety Training.

### Employee screening

Per the Los Angeles Department of Public Health (LADPH), employee screenings are conducted each day before employees may enter the workspace, through our daily symptom monitoring survey which is completed online. Symptom monitoring surveys include a screening for cough, shortness of breath, difficulty breathing, diarrhea, and fever or chills and if the employee has had contact with a person known to be infected. [Employee Symptom Monitoring Protocol](#)

UCLA Lab School employees will self-monitor for symptoms of COVID-19 using the UCLA Employee Symptom Monitoring Survey in adherence to the UCLA Requirements for COVID-19 Symptom Monitoring for Covered Employees. UCLA Lab School will follow the UCLA COVID-19 Community Screening Protocol at all times.

### **Correction of COVID-19 Hazards**

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

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

Individuals are identified as being responsible for timely correction.

Follow-up measures are taken to ensure timely correction.

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

#### **Physical Distancing**

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

- UCLA Lab School will observe CDC physical distancing guidelines. In addition, the school has outlined specific protocols for common use/high traffic areas, the Student Life Suite (noted below) and Dining Area.
- Employees will be expected to use the sanitizing stations located throughout campus multiple times a day as needed
- Virtual meetings will continue to the extent feasible.
- Individuals need to maintain a 6-foot distance from others whenever possible, including instances where people are waiting in lines, lobbies, and other waiting areas, where physical distancing aids should be used
- Managers will consider implementing work shifts and/or staggering days of onsite presence to reduce occupancy
- Approved physical distancing signage and aids are deployed to designated, high traffic/customer areas and will be used as needed
- We will work as a community to ensure compliance with safety measures and implement course correction protocols when needed

#### **Face Coverings**

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department.

- All will be required to wear a face covering unless granted official exemption. Emergency face coverings will be available at the reception desk. Educators and students must plan on coming to campus daily with two clean face coverings.
- Face coverings are to be worn by students, essential visitors and UCLA employees at all times except when eating or alone in a room. If an individual does not wear face covering or other acceptable face shield without an adequate reason, they may be sent home if counseling does not resolve the issue
- During on-campus isolation, the use of face coverings for persons with respiratory symptoms and fever over 100.4 is recommended if available and tolerated by the person and developmentally appropriate
- Face coverings to be worn by educators, staff, and visitors at all times while on campus inside and outside where they are likely to come into contact with others, in accordance with UCLA guidance for use of cloth face coverings.
- All will be required to wear a face covering unless granted official exemption. Emergency face coverings will be available upon request from the Operations team. Educators and students must plan on coming to campus daily with two clean face coverings.

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

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area; if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis. Please connect with Human Resources if you have a medical issue that requires exemption.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart.

Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

### **Engineering controls**

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

- Use of clear, Fire Department and UCLA Facilities approved plexiglass shields/barriers between student/guest and team member in high use service counter areas
- Team Members that work adjacent to each other and must work onsite during the same shift will be reassigned to other work stations to allow for physical distancing to the extent possible or work on site on alternate work days. In cases where offices/conference spaces are shared, windows will remain open throughout the space usage and HEPA air purifiers may be used

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

- Where indicated by UCLA Environmental Health and Safety, a HEPA air purifier will be used in addition to other ventilation measures (open windows and updated MERV filters where applicable).
- Team Members that work adjacent to each other and must work onsite during the same shift will be reassigned to other work stations to allow for physical distancing to the extent possible

or work on site on alternate work days. In cases where offices/conference spaces are shared, windows will remain open throughout the space usage and HEPA air purifiers may be used

- UCLA Lab School will ensure buildings are cleaned prior to re-opening
- Building ventilation has been tested and will be checked by UCLA Facilities every 12 months or as needed. Moreover, we will maximize natural ventilation with doors and open windows where mechanical ventilation is not installed
- Measures are in place to promote optimal ventilation in the school. These may include:
  - At least 50% of meals and physical activities have been moved to outdoor space whenever feasible and weather permitting.
  - The school HVAC system is in good, working order with a MERV Rating of 10, the highest rating the system will take
  - Doors and windows are kept open during the school day if feasible and if outdoor conditions make this appropriate

### **Cleaning and disinfecting**

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

UCLA Lab School will implement sanitation, cleaning, and disinfection measures as outlined in the UCLA Back to School PreK-12 COVID Mitigation Measures. In addition, the following procedures will take place locally;

- Procurement of sanitizer wipes, spray, liquid and other disinfecting materials have been procured for the school in anticipation of reopening within the school year. A detailed log of the stock is currently maintained by the Operations Manager. The log includes expiration dates of each item, storage location and a plan of deployment and restock in each space where they have pre-identified to be located upon re-opening. Moreover, all materials sourced were verified to be in compliance with List N: Disinfectants for Coronavirus (COVID-19) as outlined by the Environmental Protection Agency
- High touch areas will be cleaned at least twice daily by custodial services
- Breaks are available for all employees during the day to wash their hands as needed
- A team of custodial staff will be available during the day/night shift to ensure additional sanitation and disinfection measures are adhered to
- Each classroom, copy room, lobby, kitchen and other areas as needed will be supplied with disinfecting wipes/cleaning materials, disinfecting spray or other sanitizing materials
- Sanitization stations are located throughout campus for employees, students and required visitor usage. All stations will be refilled as needed throughout the day as feasible and contain sanitizer meeting the minimum recommended 60% concentration of alcohol base
- Students and educators may be provided with non-reusable storage bags for their face covering during meals
- All employees will be expected to clean after themselves
- The square footage of all classrooms and copy room have been observed to establish a new maximum capacity for each location. A directional passageway of one-way foot traffic pattern has been implemented in all student/educator areas where applicable (see Egress/Ingress guide).
- Copy Room and Copy Machines: Disinfecting materials will be available in the copy room. Educators will be expected to wipe down equipment used after each use
- Offices: Employees in offices will be expected to wipe down their desk areas at least once

daily, in addition to their office phone

- Employees and students are provided their own equipment and supplies in order to avoid sharing where feasible. If items are borrowed, educators will be expected to clean borrowed items prior to returning them
- Art, iSTEAM, Physical Education:
  - Where individualized alternatives are not feasible, for example, art rooms where some equipment may have to be used by multiple students, objects and surfaces are cleaned and disinfected between users
  - All PE/Athletic equipment will be cleaned and disinfected regularly (before and after each use)

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

Follow [Standard Operating Procedure for Responding to COVID-19 cases at UCLA](#), which includes sanitization of the space with an electrostatic sprayer, Clorox Total 360 disinfectant cleaner.

UCLA Lab School will follow Public Health cleaning and disinfection guidance, which includes providing a thorough cleaning and disinfection of equipment, the educational/work environment, and frequently touched surfaces and objects following a possible COVID-19 exposure and increasing routine cleaning and disinfection with an approved cleaning agent, listed on the Environmental Protection Agency (EPA)-approved list “N”, per product instructions. When EPA-approved disinfectants are not available, alternative disinfectants can be used (for example, 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions). We will not mix bleach or other cleaning and disinfection products together – this causes toxic fumes that may be very dangerous to breathe.

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

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

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by employees, who will wipe down their shared workspaces and equipment/tools used after each use (disinfectant wipes, spray, or other materials can be found in the copy room, in all classrooms, and throughout the building).

- All employees will be expected to clean after themselves and observe shared space norms as agreed upon
- Employees should use hand sanitizer or wash their hands before using high touch items such as shared copy/printing machines
- Individuals may be expected to wipe down shared equipment and tools used

### **Hand sanitizing**

In order to implement effective hand sanitizing procedures:

- All are expected to wash hands frequently with soap and water for 20 seconds, or when handwashing is not available, use alcohol-based hand sanitizer of 60% or more
- Sanitizer for high-touch surfaces and alcohol-based hand sanitizer sufficient for each phase of operational ramp up is available in multiple stations throughout the building
- All visitors entering the lobby will immediately use the hand sanitizer and the entry upon entry and exit

### **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.

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

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

Communication of test results and next steps will be provided by the UCLA Exposure Management Team as outlined in the LADPH K-12 Re-Opening Protocol. UCLA Lab School will follow all requirements listed in the most current version of the LACDPH Protocol for Exposure Management Plan in K-12 Schools. All UCLA Lab School students and staff who are on campus are enrolled in UCLA's Contact Tracing and Exposure Management system to ensure swift response to any positive case or close contact.

## **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:

- Who employees should report COVID-19 symptoms and possible hazards to, and how:
  - Symptoms and possible hazards will be reported to the UCLA Exposure Management Team via the daily Employee COVID-19 Symptom Monitoring Survey
- That employees can report symptoms and hazards without fear of reprisal via the daily symptom monitoring survey or to their direct supervisor
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness:
- UCLA Lab School employees and students will be tested weekly (every 5-9 days). Free testing will increase to twice weekly should the positivity rate of any one group reach 2% or per the latest COVID19 Community Screening Protocol. In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Communication of test results, close contacts, exposures, and related next steps will be provided by the UCLA Exposure Management Team as outlined in the LADPH K-12 Re-Opening Protocol.
- In addition, a taskforce composed of leaders from Early Care and Education centers, the UCLA Lab School, Geffen Academy, PreK-12 Superintendent, Nava Yeganeh, MD, MPH for UCLA Pediatrics, Infectious Disease and Carlos F. Lerner, MD, Ronald Reagan UCLA Medical Center, Pediatrics has been formed in order to ensure communication, guidance and, procedures and protocols are in compliance with Los Angeles County Department of Public Health and UCLA requirements
- The school has developed and circulated a communication plan in case full or partial closure is required due to a possible cluster of COVID-19 cases

## **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 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.
- UCLA Lab School administration and health services will provide training and COVID-19 education prior to welcoming students to on site learning. All employees were provided a September 30, 2020 deadline to complete the COVID-19 Pandemic: Returning to Work on Campus course via the UCLA LMS site. In addition, students, parents/guardians and educators will receive informational videos on proper placement of face covering, and general COVID-19 health and safety information as released by Centers for Disease Control and Prevention (CDC). Education will be continuous throughout the pandemic as conditions and requirements change.

## **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 campus until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
- Continuing and maintaining an employee's earnings and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by UC current leave policies.

- 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 on our campus 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 on campus to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- UCLA Lab School will collaborate with UCLA’s Exposure Management and Contact Tracing Teams to ensure all state, county, and local reporting and exposure management expectations are fulfilled. UCLA Lab School will implement all policies and procedures outlines by the UC Regents.

**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 may be required for an employee to return to work per current CDC, state, and county recommendations.
- 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.

---

**Georgia Ann Lazo, Principal**

Signature:  \_\_\_\_\_

Date:  \_\_\_\_\_





## Appendix A: COVID-19 Inspections

Date: Weekly beginning 3/19/21

Name of person conducting the inspection: Juan Gómez (or Campus Operations team member)

Work location evaluated: UCLA Lab School main campus

Exposure Controls	Status	Person Assigned to Correct	Date Corrected
<b>Engineering</b>			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
<b>Administrative</b>			
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			
<b>PPE (not shared, available and being worn)</b>			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

## Additional Consideration #1

### Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP 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 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.
  - [describe other applicable controls].

#### **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 will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section [3205.2](#) for details.]

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. 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**.