



ADULT EDUCATION

Pathways Academy Adult Education COVID-19 Prevention Plan

Pathways Academy Adult Education (“PAAE” or “School”) adopts this COVID-19 Prevention Plan (“CPP”) in accordance with Cal-OSHA regulations. The following CPP outlines the School’s plan to maximize workplace safety and health, and the steps the School takes to protect workers from being exposed to infectious diseases like the Novel Coronavirus (COVID-19).

COMMUNICATION

The School will do all of the following in a form readily understandable by employees:

- Ask employees to report to human resources, without fear of reprisal, COVID-19 symptoms, possible COVID-19 exposures and possible COVID-19 hazards at the workplace
- Describe procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Provide information about access to COVID-19 testing. If testing is required, the School will inform affected employees of the reason for the COVID-19 testing and the possible consequences of a positive test.
- Communicate information about COVID-19 hazards and the employer’s COVID-19 policies and procedures to employees and to other employers, persons, and entities within or in contact with the School’s workplace.

IDENTIFICATION AND EVALUATION OF HAZARDS

Employees shall participate in the identification and evaluation of COVID-19 hazards.

Identification

- Employees must evaluate their own symptoms and complete the School’s wellness check before reporting to in-person assignments.
- Employees with COVID-19 symptoms must contact human resources immediately by phone or text and are not permitted to report to work or be within six feet of other employees, students and their families, or vendors and community providers until permission is received from human resources.
- For staff with job responsibilities that must be completed in-person and cannot be performed remotely, the School will screen employees for COVID-19 symptoms and document the following:
 - Name

- Responses to questions regarding the nature of the in-person meeting and when they completed the self-checker and their results
- In the event that there is an outbreak of three or more cases in an exposed workplace the following will apply:
 - The School will provide COVID-19 testing to all employees at the exposed workplace except for employees who were not present during the period of the outbreak identified by a local health department or the relevant 14-day period(s) under subsection (a) as applicable. COVID-19 testing will be provided at no cost to the employees during employees' working hours.
 - After the first two COVID-19 tests, the School will provide continuous COVID-19 testing for employees who remain at the workplace at least once per week, or more frequently, if recommended by the local health department.
 - The School will provide additional testing when deemed necessary by OSHA.

Evaluation

To prevent or reduce the risk of transmission of COVID-19 in the workplace, the following procedures will be implemented:

- The School will conduct periodic inspections as needed (every 30 days if during an active outbreak) to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with its COVID-19 policies and procedures. And, will evaluate existing COVID-19 prevention controls at the workplace and the need for different or additional controls.
- The School will conduct a workplace-specific identification of all interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards:
 - Where required by State and local health departments, specific workplace plans will be posted alerting employees and visitors of the measures that are needed to prevent the spread of COVID-19 within the establishment.
 - When practicable, increased air circulation will be implemented by opening doors/windows.
- Signage will be posted at the workplace entrance requiring all who enter to wear a face covering and restricting those who have COVID-19 symptoms from entering.
- Signage will be placed in the restroom(s) and in the kitchen/lunchroom if applicable reminding employees to wash their hands with soap and water.
- All persons at the workplace will be required to wear a face covering if they are or would likely be within six feet of another person.
- Communal items that cannot be sanitized between uses will no longer be available for use.
- Sanitizer will be readily available to employees throughout the workplace and provided to clean high touch areas like the copier touch screen, between uses.
- Soap and water will be available to employees to wash their hands.
- Meeting attendees will be required to maintain social distancing at all times.
- Breaks and lunch times may be staggered to accommodate fewer employees in designated areas at one time in order to maintain social distancing.
- The maximum capacity in order to maintain social distancing for communal spaces will

- be posted in conspicuous places.
- If an employee cannot maintain social distancing during a work-related task, they will be required to wear a face covering and limit the length of the interaction.
- The School will treat all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.
- Human Resources will monitor employee exposure and symptoms through a self-assessment system:
 - Upon learning an employee may have been exposed to COVID-19 or is experiencing symptoms, human resources will determine a course of action based upon the guidance of the CDC and local health officials.
 - If it is determined by human resources that the employee should be tested for COVID-19, the employee will be directed to a specific testing location. Employees will be encouraged to access testing through their regular health care provider if insured. EACS will reimburse the employee for the cost of the examination should the employee have been exposed in the course of work.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

The School has established a procedure to investigate COVID-19 cases in the workplace. This includes procedures for verifying COVID-19 case status, receiving information regarding COVID-19 test results and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases.

- Where there has been a COVID-19 case at the place of employment, the following steps will be taken:
 - a. Determine the day and time the COVID-19 case was last present and, to the extent possible, the date of the positive COVID-19 test(s) and/or diagnosis, and the date the COVID-19 case first had one or more COVID-19 symptoms, if any were experienced.
 - b. Determine who may have had a COVID-19 exposure. This requires an evaluation of the activities of the COVID-19 case and all locations at the workplace which may have been visited by the COVID-19 case during the high-risk exposure period.
 - c. Provide notice of the potential COVID-19 exposure, within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
 - All employees who may have had COVID-19 exposure
 - Community providers, vendors and other individuals present at the workplace during the high-risk exposure period.
 - d. Offer COVID-19 testing at no cost to employees during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with information on available resources and benefits.
 - e. Investigate whether any workplace condition could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.
- Personal identifying information or medical services provided to COVID-19 cases or

persons with COVID-19 symptoms shall be kept confidential.

- The School shall ensure that all employee medical records are kept confidential and are not disclosed or reported without the employee's express written consent to any person within or outside the workplace, except when legally required.

CORRECTION OF COVID-19 HAZARDS

The School has implemented policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

These include, but are not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted, and implementing the controls outlined in the Evaluation section of this policy.

The School will implement procedures to reduce the transmission of COVID-19 based on the investigation. The School will consider moving indoor tasks outdoors or have the tasks performed remotely, increasing outdoor air supply when work is done indoors when possible, increasing physical distancing as much as possible, requiring face masks, and other applicable controls.

TRAINING AND INSTRUCTION

Notification shall be provided to parents advising them of health and safety requirements for students to return to in-person activities. Staff shall receive training and information on COVID-19 and preventative practices.

The School will provide effective training and instruction to employees that includes the following:

- A digital or printed copy of the policies and procedures designed to protect employees from COVID-19 hazards outlined in this document.
- A digital or printed copy of COVID-19 related benefits to which the employee may be entitled under applicable federal, state and local laws.
 - Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5
 - Labor Code sections 3212.86 through 3212.88
 - Local governmental requirements
 - The School's leave policies
- Online COVID-19 training that includes the following information:
 - COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although less common.
 - An infectious person may have no symptoms.
 - The importance of physical distancing of at least six feet combined with the wearing of facial 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 in order to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds.
- The importance of using hand sanitizer as a disinfectant when employees do not have immediate access to a sink or hand washing facility.
- The proper use of face coverings.
- A list of COVID-19 symptoms, and the importance of not coming to work and obtaining a COVID-19 test if the employee has such symptoms.

PHYSICAL DISTANCING

For schools to safely reopen and allow students, teachers, and staff to reconvene in-person services, protective measures must be taken and all staff and offices shall be required to follow recommended sanitation protocols in accordance with published guidelines and practice physical distancing. Schools shall take measures to limit in-person access and detect sources of COVID-19 or other infectious diseases.

- All employees shall be separated from other persons by at least six feet when practicable and except for momentary exposure while persons are in movement. Methods of physical distancing include:
 - Telework or other remote work assignments;
 - 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 others should be located or their direction and path of travel;
 - Staggered arrival, departure, work, and break times;
 - Adjusted work processes or procedures to allow greater distance between employees.
- When it is not possible to maintain a distance of at least six feet, individuals shall distance themselves as far apart as possible.

FACE COVERINGS

As per the guidance for schools and school-based programs per California Department of Public Health (CDPH), the use of face coverings is strongly encouraged for students in grades kindergarten through 2, and required for students in grades 3 through 12. Continuing use of face coverings shall be consistent with the CDPH, and other local and state school reopening guidelines. Students who do not have personal face coverings shall be provided with face coverings by the school at no cost. Guidelines shall be developed for the use of face coverings by all students including those with special needs and have identified medical concerns. Measures shall be taken to avoid and mitigate any unintended consequences of implementing any safety precautions.

Staff shall be required to wear face coverings when engaging with students, staff, or community members for their own protection, and to protect the health and safety of students and other staff

members. Personal protective equipment (PPE) shall be required for specific job functions and distributed to staff in accordance with board policies, and laws.

Students and staff who exhibit signs or symptoms of COVID-19 shall self-quarantine for 14 days and are further prevented from participating in any in-person activity or meeting until it is medically safe for them to return. Students who are unable to meet with staff as a result of COVID-19 shall continue to receive instruction and support.

The School shall provide face coverings and ensure they are worn by employees over the nose and mouth when indoors, when outdoors and less than six feet away from another person, and where required by orders from the State Department of Public Health or local health department.

- The School will ensure face coverings are clean and undamaged. Face shields are not a replacement for face masks, although they may be worn together for additional protection.
- The following exceptions are allowed in the removal of the face mask:
 - When the employee is alone in a room.
 - While eating and drinking at the workplace, provided the employees are at least six feet apart and outside air supply to the area when possible, 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.
 - Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.
- Employees exempted from wearing face coverings due to a medical condition, mental health condition, or disability shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.
- Any employee not wearing a face covering, face shield with a drape or other effective alternative, for any reasons, shall be at least six feet from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.
- The School will not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required.
- The School will not prevent any employee from wearing a face covering when not required by this section, unless it would create a safety hazard, such as interfering with the safe operation of equipment, if applicable.
- The School will enforce measures to communicate to non-employees the face coverings requirement on their premises or when engaging with its employees as outlined in the Evaluation section of this policy.
- The School shall enforce COVID-19 policies and procedures to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public outlined in the Evaluation section of this policy.

SITE-SPECIFIC ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT

Site-Specific Engineering Controls

- At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the School will install or utilize cleanable solid partitions that effectively reduce aerosol transmission between the employee and other persons.
- For the School offices with mechanical or natural ventilation, or both, the School will maximize the air quality to the extent feasible.

Administrative Controls

The School has implemented cleaning and disinfecting procedures, which would require:

- Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, and bathroom surfaces. The School will inform and regularly remind employees of cleaning and disinfecting protocols, including the planned frequency and scope of regular cleaning and disinfection. The following cleaning and disinfecting schedule is as follows:
 - Prior to the employee beginning their work day
 - At the end of the employee's work day
- Sharing of personal protective equipment is prohibited, and to the extent feasible, items that employees come in regular contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing will be minimized and such items and equipment shall be disinfected between uses by different people. Sharing of vehicles for work related purposes shall be prohibited.
- Areas, materials and equipment used by a COVID-19 case during the high-risk exposure period will be cleaned and disinfected in a manner that does not create a hazard to employees.
- To protect employees from COVID-19 hazards, the School will evaluate its handwashing facilities, determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer. The School shall encourage employees to wash their hands for at least 20 seconds each time. Provision or use of hand sanitizers with methyl alcohol is prohibited.

Personal Protective Equipment

- The School will continuously evaluate the need for personal protective equipment to prevent exposure to COVID-19 hazards, such as gloves, goggles, and face shields, and provide personal protective equipment that relate to the job the employee performs as needed.

REPORTING, RECORDKEEPING, AND ACCESS

- The School will report information about COVID-19 cases at the workplace to the local health department immediately, but no longer than 48 hours after the employer knows, or

with diligent inquiry would have known, of three or more COVID-19 cases for guidance on preventing the further spread of COVID-19 within the workplace.

- The School 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. The School shall continue to give notice to the local health department of any subsequent COVID-19 cases at the workplace.
- The School will report immediately to their State's OSGA Division (OSHA) any COVID-19 related serious illness or death, as defined under section 330(h), or an employee occurring in a place of employment or in connection with any employment.
- The School will maintain records of the steps taken to implement the written COVID-19 Safe Reopening and Operation of Schools policy.
- The written COVID-19 Safe Reopening and Operation of Schools policy will be made available at the workplace to employees and to representatives of OSHA immediately upon request.
- The School will keep a record of and track all COVID-19 cases with:
 - Employee's name
 - Contact information
 - Occupation
 - Location where the employee worked
 - Date of the last day at the workplace
 - Date of a positive COVID-19 test
- Medical information will be kept confidential.
- The information will be made available to employees or otherwise required by law, with personal identifying information removed.

EXCLUSION OF COVID-19 CASES

The following describes how the School is to limit transmission of COVID-19 in the workplace.

- The School will ensure that COVID-19 cases are excluded from the workplace until the employee is safe to return, according to federal, state and local guidelines
- The School will exclude employees with COVID-19 exposure from the workplace for the necessary number of days based on current guidelines after the last known COVID-19 exposure to a COVID-19 case.
- For employees excluded from in-person work and otherwise able and available to work, the School will continue an employee's earnings and all other employee rights and benefits, including the employee's right to their job status. The School may use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation. These procedures will not apply:
 - To any period of time during which the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19

- transmission.
 - Where the employer demonstrated that the COVID-19 exposure is not work related.
- This section does not limit any other applicable law or school policy that provides greater protections.
- At the time of exclusion from in-person work, the School will provide the employee the information on available benefits.

RETURN TO WORK CRITERIA

Note that the following criteria is subject to change based on the current federal, state and local guidance.

- COVID-19 cases or employees with COVID-19 symptoms shall not return to work until all of the following have been met:
 - At least 24 hours have passed since 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 test positive but never developed COVID-19 symptoms shall 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 shall not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee shall not return to in-person work until the period of isolation or quarantine is complete and the order is lifted. If no period was specified, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
- If there are no violations of local or state health officer orders for isolation or quarantine, OSHA may, upon request, allow employees to return to in-person work on the basis that the removal of an employee would create undue risk to the community's health and safety. In such cases the School shall develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employee at the workplace.

Decisions concerning school closure, whether full or partial, shall be made in consultation with local health officials and in accordance with state guidelines.

It is the policy of the Board of Directors of the School that all teachers and staff shall be responsible for ensuring adherence to the policies of the School for the safe reopening and operation consistent with all laws, regulations, and policies.