

COVID-19 Prevention Program (CPP) for ISANA ACADEMIES

Pursuant to the California Occupational Safety and Health Standards Board (Cal/OSHA) emergency temporary standard, ISANA's COVID-19 Protection Program has been updated, effective immediately. This program applies to all employees (herein collectively referred to as "employees") working at any of the ISANA school sites (ISANA Achnar Academy, ISANA Cardinal Academy, ISANA Himalia Academy, ISANA Nascent Academy, ISANA Octavia Academy, ISANA Palmati Academy). This program does not apply to employees working from home.

Key Definitions

"COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

"COVID-19 case" means a person who:

- (1) Has a positive "COVID-19 test" as defined in this section;
- (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or
- (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county.

A person is no longer a "COVID-19 case" in this section when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

"COVID-19 exposure" means being within six feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the "high-risk exposure period" defined by this section. This definition applies regardless of the use of face coverings.

"COVID-19 hazard" means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

"COVID-19 symptoms" means fever of 100.4 degrees Fahrenheit or higher, chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, or diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.

"COVID-19 test" means a viral test for SARS-CoV-2 that is:

- (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and
- (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

"High-risk exposure period" means the following time period:

- (1) For persons who develop COVID-19 symptoms: from two days before they first develop symptoms

until 10 days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or

(2) For persons who test positive who never develop COVID-19 symptoms: from two days before until ten days after the specimen for their first positive test for COVID-19 was collected.

Authority and Responsibility

The Chief Executive Officer 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

In accordance with ISANA's COVID-19 Containment, Response, and Control Plan ("Containment Plan"), all employees who report to work must first be screened before entering any ISANA site. This may be conducted remotely. If on-site, this screening will be conducted by undergoing a non-contact temperature check at the workplace and by employees conducting a self-screening for COVID-19 symptoms.

Per the Containment Plan, employees who have a fever (temperature of over 100.4 degrees Fahrenheit) or who have any symptoms of COVID-19 after screening are advised to return home and work remotely. To acquaint all employees with the proper precautions when sick, employees are encouraged to visit the CDC's website at:

<https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

Investigating and Responding to COVID-19 Cases

All employees are encouraged to consult with a licensed health care provider and take recommended COVID-19 tests if they suspect they have been exposed to COVID-19. Employees who receive a positive COVID-19 test shall as soon as practicable notify ISANA if they have been at the workplace during the high-risk exposure period. Those assigned to a school site should contact the Principal and member of the COVID-19 Compliance Task Force (e.g., Chief Executive Officer and Chief Operations Officer).

Reports of COVID-19 cases or exposure to COVID-19 in any of our campuses will be investigated in a timely manner. ISANA will take the following steps when there has been any such report in any of our campuses in accordance with the Containment Plan:

- (1) 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.
- (2) 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.
- (3) Give notice of the potential COVID-19 exposure, within one business day or soon as practicable, in a way that does not reveal any personal identifying information of the COVID-19 case, to the following:
 - a. All employees who may have had COVID-19 exposure and their authorized representatives.
 - b. Independent contractors and others present at or who travelled through the workplace during the high-risk exposure period.

c. Local, state, or federal authorities as required by law (e.g., Los Angeles County Department of Public Health)

(4) Offer COVID-19 testing at no cost during their working hours to all employees who had potential COVID-19 exposure in the workplace and provide them with the information on benefits, including COVID-19 specific benefits, as required by law.

(5) Investigate whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

In the investigation of possible COVID-19 cases or exposure at the workplace, we will treat all relevant employees (e.g., close contacts as defined in ISANA's Containment Plan), regardless of symptoms or negative COVID-19 test results, as potentially infectious. Personal identifying information of COVID-19 cases or persons with COVID-19 symptoms shall be kept confidential. All COVID-19 testing or related medical services provided by ISANA under this section shall be provided in a manner that ensures the confidentiality of employees' personal information. However, as required by law, ISANA shall provide unredacted information on COVID-19 cases, or other related information requested, to the local health department (Los Angeles Department of Public Health), CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or other local, state, or federal authorities.

In the event that an investigation results in the identification of a COVID-19 hazard, ISANA will correct the hazard in a timely manner. All employees, including their authorized representatives, are encouraged to work with ISANA in any investigations so that ISANA can adequately and promptly identify, evaluate, and respond to any COVID-19 hazards.

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 measures including:

1. **Classroom Furniture:** Classroom furniture is set up to ensure 6 feet between students at their desks/tables and between students and teachers (placement of desks/tables, use of floor markings to indicate required distance, etc.) to the extent feasible. Where 6 feet of distance is not possible, physical barriers are used to minimize close contacts. Under no circumstances should distance between student seating be less than 4 feet.
2. **Modifying Teaching Methods to Increase Physical Distancing:** Teaching methods have been modified to avoid close contact between students for any classes that may usually involve group activities.
3. **Work Areas:** All individual employee workstations or areas used by employees working as part of a team allow for separation of at least 6 feet. Signage alerts visitors to the need to maintain a 6-foot distance from school office personnel.
4. **Physical Distancing Requirements for Staff Meals:** To ensure that masks are worn consistently and correctly, staff are discouraged from eating or drinking except during their breaks when they are able to safely remove their masks and physically distance from others. At all times when eating or drinking, staff must maintain at least a 6-foot distance from others, including fellow employees and visitors. Eating or drinking outdoors is preferred but eating or drinking at a cubicle or workstation is preferred to eating in a breakroom if eating in a cubicle or workstation permits greater distance from and barriers between staff.
5. **Reduced Occupancy in Staff Spaces for Meals/Breaks:** ISANA shall employ measures to reduce

occupancy and maximize space between employees in spaces used by staff for meals and/or breaks such as:

- Posting a maximum occupancy that is consistent with enabling a distance of at least 6 feet between individuals in rooms or areas used for breaks.
- In compliance with wage and hour regulations, breaks are staggered to ensure that physical distancing can be maintained in break rooms.
- Placing tables 6 feet apart and assuring 6 feet between seats, removing or taping seats to reduce occupancy, placing markings on floors to assure distancing, and arranging seating in a way that minimizes face-to-face contact.
- Use of partitions is encouraged, but should not be considered a substitute for reducing occupancy and maintaining physical distancing.

6. **Promoting Safe Movement and Practices with Tape and Other Markings:** ISANA will implement measures to promote safe movement such as marking pathways for students and staff to walk to promote physical distancing and using tape or other markings to assure a six-foot distance between individuals when they have to line up (e.g., for lines to collect meals, speak with receptionist, etc.).

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.

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.

1. **General Face Covering Requirements:** All staff, students, parents, and visitors entering an ISANA campus are required to wear a cloth face covering as specified herein. Face coverings must be worn appropriately, covering both the nose and mouth.
2. **Staff Requirements:** Employees who have contact with others are offered, at no cost, an appropriate face covering that covers the nose and mouth. The covering must be worn by the employee at all times during the workday when in contact or likely to come into contact with others.
 - a. *Exceptions for Private Offices with Closed Doors:* All staff must wear face coverings at all times, except when working alone in private offices with closed doors.
 - b. *Accommodations:* Employees who have been instructed by their medical provider that they should not wear a face covering must wear a face shield with a drape on the bottom edge, to be in compliance with State directives, as long as their condition permits it. A drape that is form fitting under the chin is preferred. Masks with one-way valves must not be used.

Ventilation

Ventilation is maximized during cleaning and disinfecting to the extent feasible. If using air conditioning, ISANA uses the setting that brings in fresh air. ISANA will implement measures to promote optimal ventilation in the school such as:

- At least 50% of classroom learning, meals, and activities have been moved to outdoor space whenever feasible and weather permitting.
- The school HVAC system(s) is in good, working order.
- HVAC systems are set to maximize indoor/outdoor air exchange unless outdoor conditions (recent fire, very high outside temperature, high pollen count, etc.) make this inappropriate.

- Portable, high-efficiency air cleaners have been installed if feasible.
- Doors and windows are kept open during the school day if feasible and if outdoor conditions make this appropriate.
- Air filters have been upgraded to the highest efficiency possible, target rating of MERV-13.

Cleaning and disinfecting

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

1. **Use of Cleaning Products Effective Against COVID-19:** ISANA will use a cleaning product effective against COVID-19 according to EPA's approved list "N" (Peroxide RTU). Wipes and sanitizer shall be available for individuals to wipe down surfaces and objects in their individual areas such as phones, door handles, etc.
2. **Cleaning Common Areas:** ISANA custodial staff and other staff/contractors ("Custodial Staff") tasked with cleaning campuses will clean and disinfect common areas (tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, elevator switches and buttons, touch screens, printers/copiers, grab bars, and handrails). These areas are disinfected at least daily and more frequently as resources allow.
3. **Enhanced Cleaning when School is Closed:** Enhanced cleaning of school premises is done when students are not at school with adequate time to let spaces air out before the start of the school day.
4. **Enhanced Cleaning if COVID-19 Case:** Should we have a COVID-19 case in our workplace, we will implement the following procedures: we will thoroughly clean and disinfect in and around the areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.
5. **Schedule of Cleaning/Disinfection:** At each ISANA campus, ISANA will clean the following areas at least one daily: restrooms, lobbies/entry areas, teacher/staff break rooms, class rooms, cafeteria dining area, cafeteria food preparation area, and front office. High touch areas in staff breakrooms are frequently disinfected, and commonly shared items, such as coffee pots, pots, and dishes, are replaced with single use items or thoroughly cleaned after each use by a different person.

Shared tools, equipment and personal protective equipment (PPE)

Sharing of personal protective equipment is prohibited. To the extent feasible, items that employees come in regular physical contact such as phones, headsets, desks, keyboards, writing materials, instruments, and tools will not be shared. When it is not feasible to prevent sharing, sharing shall be minimized and such items and equipment shall be disinfected between uses by different people.

Healthy Hygiene Practices

In order to implement effective hand sanitizing procedures, ISANA implements the following procedures:

1. **Wash Hands for at Least 20 Seconds:** Students and staff are given frequent opportunities to wash their hands for 20 seconds with soap, rubbing thoroughly after application, and use paper towels (or single-use cloth towels) to dry hands thoroughly. Signage will be placed in restrooms to remind students and staff of the 20 second handwashing recommendations. Soap and water are available to all students and staff at the following locations: restrooms.
2. **Hand Sanitizers:** Ethyl alcohol-based (contains at least 60% ethanol), hand sanitizer is made available to students and staff at strategic locations throughout the school where there is no sink or portable handwashing station such as: building entrances/exits, main office, classrooms, faculty breakroom, and offices.

System for Communicating

Our goal is to be clear and transparent. We strive to ensure that our employees remain safe and healthy. In return, it is your obligation to communicate with ISANA honestly and without fear of reprisal. As such, all employees must report possible COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 hazards in the workplace. Reports of such symptoms, exposures or hazards must be made at the earliest opportunity. All reports made under this section will be confidentially received, and investigated as outlined in the “Investigating and Responding to COVID-19 Cases” section above. For those assigned to a school site, communicate with the Principal or administrative designee (e.g., Chief Executive Officer or Chief Operations Officer).

Employees who have any medical or other conditions that may put them at increased risk of severe COVID-19 illness are encouraged to report such conditions, without fear of reprisal. If not already doing so, such employees may request to work from home or other accommodations to lessen the risk of exposure to COVID-19 hazards. Upon notice, ISANA shall communicate any accommodations available to such employees.

In order to keep our employees apprised of any updates pertaining to COVID-19, ISANA will disseminate information as follows:

- Updates on our website.
- Emails sent out to the ISANA staff. Such communications may come from the COVID-19 Compliance Task Force (includes Chief Executive Officer and Chief Operations Officer).
- Key policies and procedures will be posted as they are developed.
- Various other communication channels such as social media, newsletters, etc.

Employees are encouraged to approach their immediate supervisor or Principal with any questions they may have. ISANA will also continue to inform employees and the public of key details through various external communications channels.

Training and Instruction

We will provide effective training and instruction that includes:

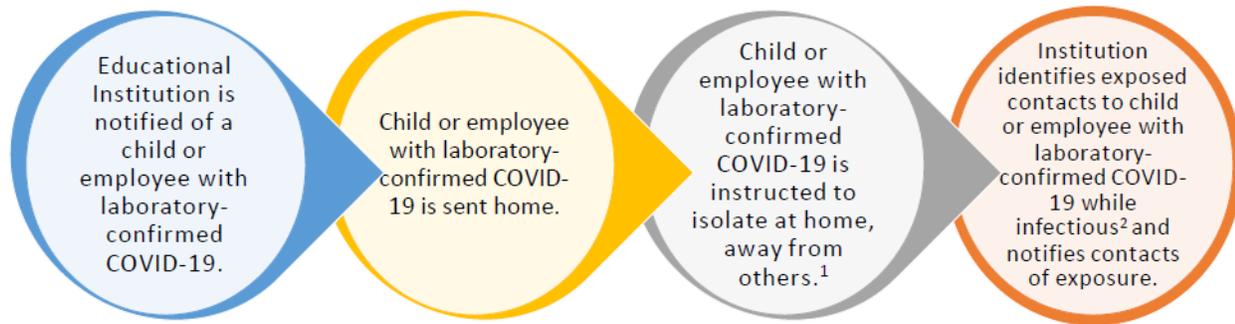
- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards, including on the health and safety protocols in the Containment Plan.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - 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.

Exclusion of COVID-19 Cases

If we have a COVID-19 case in our workplace, we will limit transmission by following applicable LA DPH and CDPH Protocols and ISANA's Containment Plan:

Guidance for Child or Employee with Laboratory-confirmed COVID-19 at an Educational Institution

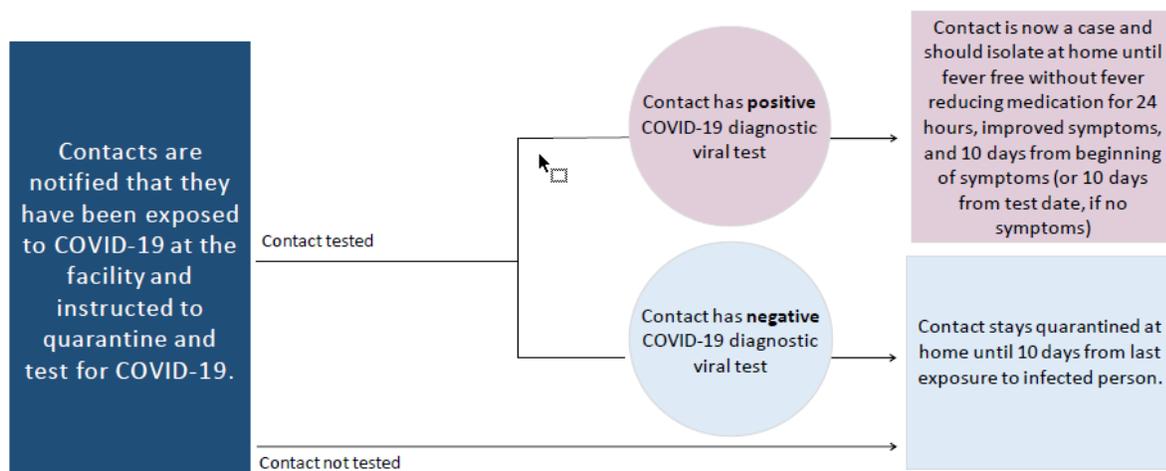


¹ Persons with laboratory-confirmed COVID-19 should isolate until fever free for 24 hours without fever reducing medication, improved symptoms, and 10 days from beginning of symptoms (or 10 days from test date, if no symptoms).

²The infectious period for an infected person is 48 hours before symptom onset (or test date for persons with no symptoms) until the infected person is no longer required to be isolated

Decision Pathways for Contacts¹ of a Child or Employee with Laboratory-confirmed COVID-19 at an Educational Institution.

¹A contact of a child or employee with laboratory-confirmed COVID-19 is defined as a child or employee at the facility that was within 6 feet of an individual with laboratory-confirmed COVID-19 for a total of 15 or more minutes over a 24-hour period; had unprotected direct contact with bodily fluids/secretions from a person with laboratory-confirmed COVID-19; or is a member of a classroom or cohort with exposure to a person with laboratory-confirmed infection.



Reporting, Recordkeeping, and Access

We shall report information about COVID-19 cases at the workplace to the local health department

whenever required by law, and shall provide any related information requested by the local health department.

In addition, we shall 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 a place of employment or in connection with any employment.

We maintain records of the steps taken to implement the written COVID-19 Prevention Program in accordance with section CCR Title 3203(b).

The written COVID-19 Prevention Program is available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.

We keep a record of and track all COVID-19 cases with the employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. Medical information shall be kept confidential as required by law. The information shall where permissible, be made available to employees, their authorized employee representatives, or as required by law, with personal identifying information removed.

Note: the above provisions do not alter the right of employees or their representatives to request and obtain ISANA's Log of Work-Related Injuries and Illnesses, without redaction, or to request and obtain other information as otherwise allowed by law.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

 - **Last Revised:** March 1, 2021
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